



The Planning
Inspectorate

Report to St Helens Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO
ST HELENS LOCAL PLAN CORE STRATEGY**

Document submitted for Examination on 27 May 2011

Examination Hearings held between 19 March and 4 April 2012 and on 9 July 2012

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Abbreviations Used in this Report

CS	Core Strategy
DMS	Delivery and Monitoring Strategy
DPD	Development Plan Document
HA	Highways Agency
LDS	Local Development Scheme
LP	Local Plan
LPA	Local Planning Authority
MM	Main Modification
MSA	Mineral Safeguarding Area
NPPF	National Planning Policy Framework
PSA	Primary Shopping Area
RS	Regional Spatial Strategy
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SRFI	Strategic Rail Freight Interchange

Non-Technical Summary

This report concludes that the St Helens Local Plan Core Strategy provides an appropriate basis for the planning of the Borough over the next 15 years providing a number of modifications are made to the plan. The Council has specifically requested that I recommend any modifications necessary to enable it to adopt the plan. Most of the modifications to address this were proposed by the Local Planning Authority, and I have recommended their inclusion after full consideration of the representations from other parties on these issues. The modifications can be summarised as follows:

- Making clear in the Spatial Vision that the challenge of positively meeting development needs whilst protecting the Green Belt lies at the plan's heart;
- Clarifying elements of the Overall Spatial Strategy (policy CSS 1);
- Amendments throughout the document to reflect the current status of the Regional Spatial Strategy;
- Introducing a new policy (CSD 1) reflecting the presumption in favour of sustainable development;
- The deletion of references to Major Developed Sites in the Green Belt;
- Alterations to policy CAS 2 to provide greater flexibility in the location of new St Helens town centre shopping floorspace and making clear that the need for measures to facilitate linked trips in the town centre includes the former Tesco site at Chalon Way;
- The inclusion in policy CSS 1 of the requirement for impact assessments for out of centre town centre uses and making clear in the supporting text that the boundaries of local and district centres and Earlestown town centre will be defined in the Allocations DPD;
- Alterations to policy CAS 3.2 to reflect the fact that it is unlikely to be the Council from whom consent would be sought for a possible Strategic Rail Freight Interchange (SRFI) at Parkside;
- Alterations to policy CAS 3.2 to ensure internal consistency and to refer to heritage impacts, strategic road network mitigation and the need for a travel plan;
- Amendment to para 9.32J so as not to predetermine Green Belt tests in respect of a possible SRFI at Parkside;
- Revisions to policy CSS 1 and para 6.10 to ensure consistency of wording and to provide clarity as to when and how a review of Green Belt boundaries would be undertaken;
- Amendments to policy CH 1 to clarify the circumstances in which green field housing development would be permitted and to more precisely define when and where higher density housing would be required;
- Alteration to policy CE 1 and its supporting text to reflect the latest situation with regard to the forecast demand for and supply of employment land and to remove the requirement for compensatory measures in cases of loss of B1, B2 or B8 land;
- Amendment to policy CR 1 to remove the reference to Mineral Safeguarding Areas for peat; and
- An additional paragraph in the Introduction Chapter to explain the role of the Delivery and Monitoring Strategy and the Annual Monitoring Report.

Introduction

1. This report contains my assessment of the St Helens Local Plan (LP) Core Strategy (CS) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers whether the development plan document (DPD) is sound and whether it is compliant with the legal requirements. Paragraph 182 of the National Planning Policy Framework (NPPF) makes clear that to be sound a Local Plan should be positively prepared; justified; effective and consistent with national policy. References in [square brackets] throughout the report are to the documents of the Council's LDF Evidence Base.
2. The starting point for the Examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted draft Core Strategy (May 2011) which was published for consultation, as the *St Helens Council, Local Development Framework Re-Publication Core Strategy Tracked Changes version* in January 2011 [LDF43A]. Following submission of the document the Council proposed a number of changes addressing points raised in representations and by me and reflecting changing circumstances. These were set out in the *St Helens Core Strategy Changes (November 2011)* document [LDF43B] (and the *December 2011 Errata* [LDF65]) and, for ease of reading, were presented in the composite *St Helens Core Strategy Accepted Changes Version (November 2011)* document [LDF43C]. These changes were the subject of full consultation and Sustainability Appraisal (SA) in late 2011/early 2012.
3. Further changes were suggested at the March/April 2012 Hearings and these, together with a number of others proposed by the Council in the light of the NPPF (published in March 2012), were the subject of full consultation and SA, as appropriate, in April – June 2012 (*Proposed Modifications to St Helens Core Strategy, April 2012 and Errata Document*) [LDF67].
4. My report deals with the main modifications that are needed to make the submitted DPD (ie the *St Helens Council, Local Development Framework Re-Publication Core Strategy Tracked Changes version, January 2011*) sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any modifications needed to rectify matters that make the plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.
5. The main modifications that go to soundness have been subject to public consultation and, where necessary, Sustainability Appraisal and I have taken the consultation responses into account in writing this report.

Assessment of Soundness

Overview

6. The St Helens Core Strategy is an ambitious but realistic plan setting out the Council's housing-led growth strategy to address the Borough's problems and challenges and to realise a strategic vision of the town in 2027. Following scene-setting introductory chapters the Overall Spatial Strategy for the

Borough is explained, supported by a Key Diagram and individual strategies for five geographical sub-areas. Six thematic chapters then detail how the Vision will be achieved in terms of ensuring quality development, creating an accessible St Helens, providing quality housing, ensuring a strong and sustainable economy, safeguarding and enhancing quality of life and meeting the Borough's resource and infrastructure needs. The strategy is clear as to where development will be promoted and where it would be inappropriate. Appendix 1 of the CS is the Delivery and Monitoring Strategy which explains how, and by whom, the strategy will be delivered and provides a framework for monitoring the achievement of its objectives. The CS is supported by an extensive economic, social and environmental evidence base summarised in a set of thematic background papers.

7. The National Planning Policy Framework (NPPF), replacing virtually all previously-existing national planning policy and guidance, was published whilst the Examination Hearings were in progress. It advises (para 153) that planning authorities should produce a Local Plan and that additional development plan documents should only be used where clearly justified. The Council's Core Strategy which (in line with its Local Development Scheme [LDF01]) is intended to be supplemented by a number of other DPDs, including an Allocations DPD, reflects in terms of its role as one of a suite of DPDs the now revoked Planning Policy Statement 12: Local Spatial Planning, and is somewhat at odds with the approach advocated in the NPPF. However, since it would be likely to take longer for the Council to get a new-style Local Plan in place than it would to adopt this Core Strategy and the related DPDs, it would not be in the interests of achieving plan-led sustainable development in St Helens for the Council to abandon the Core Strategy in order to prepare a new-style Local Plan.
8. The Council has formally self-assessed compliance of the Core Strategy with the NPPF [EX123] and in the light of this has proposed a number of consequent changes discussed below. There is nothing in the NPPF which suggests that a fundamental review of a far-advanced, but yet to be adopted, plan is, as a matter of course, necessary to ensure compliance with new national policy.

Main Issues

9. Taking account of all the representations, written evidence and the discussions that took place at the Examination Hearings I have identified nine main issues upon which the soundness of the plan depends.

Issue 1 – Is the Spatial Vision soundly and positively based reflecting the Borough's context, issues, problems and challenges and community views?

10. Chapter 4 of the CS sets out the Spatial Vision for the Borough in 2027, the end of the plan period. The vision is clear, succinct, positive and locally distinctive. Whilst the aims of having a vibrant economy, a healthy, safe and attractive environment and inclusive, sustainable communities are common to most districts in the United Kingdom, these are challenging aspirations for St Helens, bearing in mind the problems facing the area detailed in Chapter 3 of the CS – in particular high levels of multiple deprivation, poor health, derelict land and a lack of knowledge-based businesses. The Borough's built-up areas

are surrounded by Green Belt which representations indicate is highly valued locally. The challenge of positively meeting development needs whilst protecting the Green Belt lies at the heart of the CS and the Council's proposed changes **MM007** and **MM008** would appropriately make this clear in the Issues, Problems and Challenges introductory chapter of the plan. These changes are thus necessary to the soundness of the CS.

11. The Spatial Vision recognises that St Helens can take advantage of its location between Liverpool and Manchester and identifies as its main elements a regenerated town centre, new housing (including affordable accommodation) in the main settlements and growth of existing employment areas, together with a possible Strategic Rail Freight Interchange at Parkside. In addition to explaining the relevance of national and regional planning policy to the plan and identifying the main cross-boundary issues and joint working arrangements with neighbouring authorities, Chapter 2 sets out the wider local context of the CS including the *St Helens Plan 2011-2014* [LPS39] and the *St Helens City Growth Strategy* [LPS02A]. The CS's Spatial Vision reflects the vision of the *Sustainable Community Plan*, which is to make St Helens "a modern, distinctive, economically prosperous and vibrant Borough", and the overarching themes of the *City Growth Strategy* which are to transform the town's business base, the ambition of its residents and the physical condition and perceptions of the Borough.
12. Chapter 4 also explains how the Spatial Vision will be delivered through seven Strategic Aims, each of which has one or more specific Strategic Objectives. Table 4.1 effectively and concisely indicates the issues each Strategic Aim and Objective will address and identifies the policies which will deliver them. Each policy of the CS is accompanied by an inset box which indicates the Strategic Aims and Objectives it will support and the relevant delivery items which are key to its implementation.
13. The CS has been developed over a number of years and has included seven formal stages of public consultation (involving local organisations and residents, voluntary groups, businesses and neighbouring authorities) from that on the Issues and Options in August 2005 through to the seeking of views on the plan's accordance with the NPPF in April-June 2012. The somewhat drawn-out process and the number of stages of consultation and document revisions has, no doubt, confused and exasperated some members of the public. However, it is evident that, partly thanks to the hard work of both Council officers and community organisations, public engagement has been maintained and a large number of representations from the general public were submitted at each of the main stages of consultation. These mostly concern the identification of a strategic location for a possible Strategic Rail Freight Interchange. As explained under Issue 5 below, although there is fundamental opposition to this proposal from a significant proportion of the local community, in preparing the CS the Council has sought to balance this local concern with the Borough's need to positively plan for the development needs of the local area, the region and the country. The number of changes to the plan proposed by the Council in response to representations is demonstration of its commitment to take account of the views of the local community.
14. That there have been few representations from the public on other aspects of

the plan is, in my view, demonstration of the general level of, albeit passive, public support for the strategy. Given the range of other ways in which the Council sought to engage the public, in accordance with its *Statement of Community Involvement* (SCI) [LDF55 and LDF55B], I am not persuaded that the lack of references to the CS in the Council's magazine has significantly undermined community involvement in the development of the plan or prejudiced anybody's interests.

15. Subject to the changes indicated above the Spatial Vision is soundly and positively based and appropriately reflects the Borough's context, problems, issues and challenges and the views of the community.

Issue 2 – Are the Overall Spatial Strategy and the strategies for each of the five sub-areas soundly and positively based, effective and deliverable and consistent with regional and national policy?

Overall Spatial Strategy

16. Policy CSS 1 sets out the overall spatial strategy of the CS. It is the overarching policy of the plan and is supported by the Key Diagram (Figure 5.1). It accords with and adds detail to the Spatial Vision and indicates that:
 - the majority of all new development will be directed to the regional town of St Helens;
 - some new residential development will take place in other settlements in the Borough and that the main focus for economic development will be the M62 Link Road Corridor in St Helens and Haydock Industrial Estate;
 - the re-use of previously-developed land in sustainable locations will be prioritised;
 - in the short-medium term the existing general extent of the Green Belt will be maintained;
 - St Helens town centre will enhance its market share in the region and will be complemented by a hierarchy of other town, district and local centres; and
 - an area of land in the Green Belt, based on the former Parkside Colliery, is identified as a strategic location for a Strategic Rail Freight Interchange (SRFI).
17. The soundness of the hierarchy of centres, the amount and location of new residential and employment development and the SRFI strategic location (and the robustness and credibility of the evidence supporting these matters) are considered below under Issues 4, 6, 7 and 5 respectively. However, the overall spatial strategy of building sustainable communities, by concentrating the majority of new development in existing settlements on previously-developed land is a positive one; it logically flows from the plan's Spatial Vision and the analysis of the Borough's problems, opportunities and challenges and accords with national guidance and regional policies. In particular the strategy reflects the core planning principles set out in the NPPF of proactively supporting sustainable economic development to deliver the homes and business that St

Helens, the region and the country needs, protecting the Green Belt, promoting the reuse of previously-developed land and actively managing patterns of growth to make the fullest possible use of sustainable modes of transport.

18. Nonetheless, as it sets the strategy for the future allocation of sites and the determination of planning applications, it is necessary to the clarity and soundness of the CS that (1) the Council's intention that the main focus for economic development will be on previously-developed land in sustainable locations within the M62 Link Road Corridor and Haydock Industrial Estate; (2) how the re-use of previously-developed land in sustainable locations will be prioritised and (3) that part (ix) of the policy applies to the Green Belt other than the Parkside site are made clear in policy CSS 1. Amendments **MM 6-05**, **MM 6-06** and **MM 6-07** are therefore necessary to the soundness of the plan.
19. The overall spatial strategy conforms with the relevant overarching policies (RDF 1 and LCR 3) of the *North West of England Plan, Regional Spatial Strategy to 2021* (RS) [RP09] which identify St Helens as a priority town for development in the outer part of the Liverpool City Region where development should be focussed in and around the centre of the town. The submission CS was prepared at a time at which it had been announced that the RS had been revoked and it includes a number of amendments to earlier versions of the plan to reflect this. However, it has subsequently been determined that the RS remains extant and that DPDs should be in general conformity with it. Changes **MM1-14**, **MM1-15**, **MM1-16**, **MM1-19**, **MM2-02**, **MM2-04**, **MM2-05**, **MM2-06**, **MM6-22**, **MM8-02**, **MM8-04**, **MM9-17**, **MM14-10** and **MM14-11** proposed by the Council to reflect this are thus necessary to the clear demonstration of the legal compliance of the CS.

Presumption in favour of Sustainable Development

20. The NPPF indicates that Local Plans should be consistent with its presumption in favour of sustainable development. The Council's proposed modifications **MM106 – MM108** would introduce a new policy CSD 1 (supported by a statement of the relevant key delivery items and related targets and indicators) stating that the Council will take a positive and proactive approach to development proposals and will grant permission for schemes where there are no up to date relevant local/national policies, unless material considerations indicate otherwise. This change is necessary to the CS's accordance with national policy. The slight change to the wording of the model policy published by the Planning Inspectorate is appropriate given that whilst the Council can seek solutions to enable development proposals to be approved it cannot guarantee that it will find them.

Strategies for each of the five sub areas

21. Policies CAS 1, CAS 2, CAS 3.1, CAS 4 and CAS 5 provide more detailed spatial strategies for the St Helens Core Area, the St Helens Central Spatial Area, Newton-le-Willows and Earlestown, Haydock and Blackbrook and Rural St Helens. The sub areas are soundly based reflecting geographically identifiable and distinct parts of the Borough and the policies provide a clear and deliverable strategy for each area reflecting its particular needs and aspirations.

Major Developed Sites in the Green Belt

22. Policy CAS 5 indicates that development will be restricted to within existing rural settlement boundaries and within existing identified major developed sites and that, outside of these areas, development will comply with Green Belt policy. The policy also states that Bold Industrial Estate will continue to be identified as a Major Developed Site in the Green Belt and that the case for identifying other such sites will be considered in preparing the Allocations DPD. Subsequently (in November 2011) the Council proposed additional text setting out the criteria by which additional Major Developed Sites in the Green Belt would be assessed.
23. The NPPF removes previous references in national policy to the need to identify major developed sites in the Green Belt in development plans and instead indicates that the limited infilling or the partial or complete redevelopment of previously-developed sites, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development, is not inappropriate development in the Green Belt. In the light of this the Council has proposed amendments removing references from the CS to Major Developed Sites in the Green Belt and which would result in the plan indicating that development should be in accordance with Green Belt policy. Changes **MM013, MM027, MM037, MM038, MM039, MM040 and MM104** ensure that the CS accords with national policy in this respect and are thus necessary to the soundness of the plan.
24. The case for infilling or redevelopment of already developed sites in the Borough's Green Belt is appropriately considered on a case by case basis through development management decisions and none of the sites referred to in representations are of such strategic significance as to warrant specific reference to them being made in the CS.

Issue 2 - Conclusions

25. Subject to the changes indicated above, and to the consideration of other issues below, the Overall Spatial Strategy and the strategies for each of the five sub areas are soundly and positively based, effective and deliverable and consistent with national and regional policy.

Issue 3 – Does the Core Strategy provide a soundly based framework for ensuring access to jobs and services which is effective and deliverable, supported by robust and credible evidence and consistent with national policy?

26. The overall spatial strategy (Policy CSS 1) seeks to concentrate development in the main urban settlements of the Borough in order to provide good access to jobs and services, minimise journey lengths and maximise the potential for use of sustainable modes of transport. This approach accords with the core planning principle set out in the NPPF that patterns of growth should be actively managed to make the fullest possible use of public transport, walking and cycling. Policy CP 2 sets out the detailed criteria by which development proposals will be assessed in order to ensure that there is a realistic choice of

travel, including for people with mobility difficulties, to new jobs and services.

27. It is evident that parts of the M62 Link Road Corridor and Haydock Industrial Estate, which policy CSS 1 identifies as the main foci for economic development, are not currently well-served by public transport [EX327]. However, there are no obviously more sustainable locations for this development and additional employment activity at these locations will assist in creating the critical mass necessary to the provision of improved/viable public transport services. Improvements to sustainable modes of transport may be necessary to the acceptability of certain developments, as required by policies CIN 1 and CP 2. The text accompanying policy CP 2 notes that improvements to sustainable modes of transport are also likely to come forward through other funding streams.
28. The CS is predicated on the transport modelling undertaken for the Third Local Transport Plan for Merseyside (LTP3) [SRP21]. This forecasts that, by the end of the LTP3 period, there will be reductions in highway traffic growth and significant increases in public transport trips. Whilst this is a challenging objective, there is nothing to indicate that it is not realistic or that the evidence on which it is based is not robust or credible. On this basis the Council considers that, with the exception of a Strategic Rail Freight Interchange at the former Parkside Colliery (see Issue 5 below), the CS can be delivered without any new infrastructure of strategic significance. The Statement of Common Ground [EX024] agreed between the Council, the Highways Agency (HA) and Warrington Borough Council indicates that the HA is supportive of the overall amount and location of development proposed by the CS, subject to assessment of its individual and cumulative impacts on the transport network at the stage of the Allocations DPD and the determination of planning applications. These are the appropriate times at which to consider these detailed matters and it would be inappropriately onerous, and contrary to NPPF para 32, for the CS to require, in blanket form, that development does not have a material impact on the strategic road network.
29. Consequently, **no changes to the CS are necessary** to ensure that it provides a soundly based, deliverable framework for ensuring access to jobs and services which is based on robust and credible evidence and is in accordance with national policy.

Issue 4 – Does the Core Strategy provide a sound framework for the development of town, district and local centres in the Borough which is effective and deliverable, supported by robust and credible evidence and consistent with national policy?

Hierarchy of Centres

30. Policy CSS 1 defines a hierarchy of two town centres, two district centres and 12 local centres in the Borough and explains that St Helens town centre will protect and enhance its market share in the region by securing further retail and leisure development. This hierarchy is based on the evidence of the *2006 Local Centre Study* [TP13] (reviewed by the Council in 2011) and the *St Helens and Earlestown Retail and Town Centre Uses Study 2012* [TP10B]. The CS does not propose the continued designation of Clock Face as a local centre which is appropriate in the light of the very limited facilities it currently provides and

the presence of the Marshall's Cross local centre a few hundred metres away. Despite the facilities/services the current Asda proposal at this location could provide, it would, if approved and constructed, be a free-standing supermarket, not a collection of shops which is to my mind the essence of a local centre. Moreover, the land which would be taken by the Asda scheme would realistically prevent any other shopping facilities being provided at Clock Face. For the same reasons 'de-designation' of the Boundary Road local centre is also appropriate.

31. The local centre lying to the north of Clipsley Lane is separated by both distance and the busy highway itself from the Tesco supermarket on the south side of the road and there is little evidence to indicate that the facilities to the north and south of the road operate as a single shopping centre. Furthermore, there are no non-retail public facilities/services in this location which would warrant its designation as a district centre and the Council reported at the Hearings that there is nothing to suggest that such facilities are needed in this part of the Borough or are likely to be provided in the future. Nonetheless, policy CAS 4 appropriately indicates that the situation at Clipsley Lane will be monitored and changes made to its status if warranted in a future revision of the CS.

Additional Comparison Shopping Floorspace

32. To provide for the anticipated growth in expenditure in comparison goods policy CAS 2 provides for at least 17,000 sq m (net) of additional comparison retail floorspace in St Helens Central Spatial Area (which, in the light of the *St Helens and Earlestown Retail and Town Centre Uses Study, January 2012* [TP10B], the Council intends to revise by additional modification to "around 20,000" sq m). The policy states that this will be provided through redevelopment of the now vacant Tesco superstore site at Chalon Way and the enhancement of the Church Square shopping centre. However, this lacks appropriate flexibility, particularly in the light of the lack of development to date of the Chalon Way site and the existence of other town centre sites identified by the Council as possible locations for the additional shopping floorspace. **MM018**, which provides for more flexibility in the location of the new floorspace, is therefore necessary to the soundness of the plan. This change does not formally preclude the additional floorspace being provided within the St Helens Central Spatial Area but outside the town centre boundary. However, given the potential for it to be located on sequentially preferable town centre sites, and the guidance in the NPPF (para 24) that it should be so if possible, specific reference in the policy to its provision within the Central Spatial Area (ie, potentially outside the town centre) would be inappropriate.

The St Helens Town Centre Primary Shopping Area

33. Policy CAS 2 and Figure 8.1 define the Primary Shopping Area (PSA) of St Helens town centre which is a 'tighter' area than previously defined (as the 'Central Shopping Area') in the *St Helens Unitary Development Plan* [LPS32]. In the light of the definition of the PSA in the NPPF (the area of retail development generally comprising the primary and those secondary frontages which are adjoining and closely relate to the primary shopping frontage) it is appropriate to exclude from the PSA the areas to the north of King Street and

the education quarter around Water Street. Given its proximity to the primary frontage at Bridge Street and its envisaged role in accommodating additional comparison shopping floorspace, the Chalon Way site has potential to be part of the PSA. However, bearing in mind that the site currently provides no shopping facilities and that its building is some 250m or so from the primary frontage and separated from it by Chalon Way and a surface level car park, it is sound to exclude this site from the PSA at this stage. Redevelopment of the site in a format and including measures which would facilitate linked trips between it and the rest of the town centre would be a prerequisite of its successful development and thus amendment **MM019** is necessary to provide clarity to potential developers in this respect.

Town Centre Uses Impact Assessments

34. The Council's proposed changes to policy CSS 1, **MM6-03** and **MM6-04**, would require impact assessments for applications for main town centre uses (including offices) of 200, 300 and 500 sq m in edge/out of local, district and town centre locations respectively. This approach accords with the guidance in the NPPF and, in being a key means by which the viability and vitality of the Borough's shopping centres would be supported, the principle of these changes is necessary to the soundness of the CS. Although in actual terms the floorspace thresholds are not indicative of large scale developments, bearing in mind that they amount to around 10% of the total floorspace in a number of the centres, they are, in relative terms, appropriate. To ensure that the impact assessment requirements are proportionate to the scale of the development and to make clear that the, currently undefined, boundaries of the local and district centres and Earlestown Town Centre will be designated in the Allocations DPD, amendment **MM015** to paragraph 6.9A of the plan is necessary. National policy no longer indicates that plans should specify the geographical areas to which such thresholds apply. Moreover, bearing in mind the number and potentially overlapping catchments of the Borough's centres it would not be feasible for the CS to specify these areas which will need to be agreed on a case by case basis.

Issue 4 - Conclusions

35. Subject to the changes indicated above the CS provides a sound framework for the development of town, district and local centres in the Borough which is effective and deliverable, supported by robust and credible evidence and consistent with national policy.

Issue 5 – Is the identification within the Core Strategy of land at/around the former Parkside Colliery as a strategic location with the potential to facilitate the transfer of freight between road and rail soundly based, supported by robust and credible evidence and consistent with regional and national policy?

36. Policy CAS 3.2 states that the Council supports in principle the delivery of a Strategic Rail Freight Interchange (SRFI) at, and adjacent to, the site of the former Parkside Colliery which is situated in the Green Belt. The policy indicates that, subject to it meeting a number of criteria, planning permission will be granted for such a development on the site, identified in broad terms in figure 9.2, to the west side of the M6. Amendments **MM9-08** and **MM9-14**

reflect the fact that a development of the scale envisaged would be considered by the Major Infrastructure Unit of the Planning Inspectorate and would be the subject of a ministerial decision. Thus, as factual corrections of significance (which alter the policy to one setting out the criteria an SRFI scheme would need to meet to secure the support of the Council), these modifications are necessary to the soundness of the CS.

37. For many years national policy has encouraged the reservation of sites for, and the development of, large scale rail freight interchange facilities in order to achieve a modal shift in the movement of freight from road to rail. Para 31 of the NPPF states that "Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges....". In support of reducing carbon emissions and easing road congestion policy RT 8 of RS indicates that consideration in plans and strategies should be given to the allocation of land for inter-modal freight terminals in four broad locations, including Newton-le-Willows, with which CS policy CAS 3.2 accords. The Parkside site, located midway between Merseyside and Greater Manchester (two of the UK's largest centres of population) with potential for direct access to the West Coast Main and Liverpool – Manchester rail lines and the M6 and with the M62 a short distance away is, in principle, an ideal location for a rail freight facility of regional/national significance. Assuming it was to have the primary purpose of facilitating the movement of freight by rail the national/regional benefits of the scheme, in terms of carbon emission and traffic congestion reduction arising from reduced lorry movements, could be significant.
38. Doubts are expressed about the need for and viability of an SRFI at Parkside in the light of current economic conditions and the existing and approved rail freight interchange capacity elsewhere in the North West and it is notable that economic viability concerns have been cited as leading to the withdrawal in 2010 of a planning application for an SRFI at the site. However, over the 15 year life of the CS there is the potential for the UK's economy to expand significantly and it is a key objective of the NPPF that development plans should cater for this. Moreover, in the event of a step-change in the amount of freight moved by rail (which is an objective of national policy and could arise relatively quickly as a result of factors beyond planning control) the evidence set out in the *Parkside Strategic Rail Freight Interchange (Update, May 2011) Background Paper* [TP42C] suggests that the existing/approved SRFI capacity in the North West would be insufficient to cater for demand. The expansion of container facilities at the Port of Liverpool and possible worldwide changes in container movements could reduce the potential for movement of freight by rail from southern/eastern ports to the north west, although at this stage this (and its precise effects were it to happen) is little more than speculation and is not a sound basis for development planning.
39. I have sympathy with the view that, notwithstanding the national/regional support for the provision of additional SRFI capacity, it is appropriate to build only as many such developments as are needed rather than to build as many as possible, particularly where use of Green Belt land is concerned. However, whilst need can only be thoroughly examined in relation to a specific proposal (and Green Belt tests are likely to require detailed evidence that the need

could not be met on other, non-Green Belt, sites) it would be inappropriate for the CS not to plan for a potentially necessary SRFI simply because the need for it has yet to be convincingly proven.

40. At the Hearings it was indicated that the majority owner of the Parkside site is confident that an SRFI scheme would be developed during the plan period although there is of course no certainty about this. Nonetheless, bearing in mind its locational attributes as a site for an SRFI, this lack of certainty is not good reason not to plan for such a facility. Indeed, notwithstanding the level of local public opposition to an SRFI scheme, to do otherwise would not be the positive planning of seeking opportunities to meet the development needs of the area and taking account of the need for strategic infrastructure, including nationally significant infrastructure, required by the NPPF.
41. It is of course very likely that an SRFI scheme at Parkside would be inappropriate development in the Green Belt (as defined by Section 9 of the NPPF), it is inevitable that it would transform the appearance of the mostly 'open' countryside site and that its presence would alter the character of the surrounding area and impact on the lives of local people to a significant degree. Health, air quality (bearing in mind that there is already an Air Quality Management Area in the vicinity), light and noise impacts, together with effects on biodiversity (including the nearby SSSI), farming, archaeology/heritage (including battlefields), landscape, agricultural land and a range of other issues would need to be carefully assessed in detail and the potential for, and likely impact of, mitigation measures considered. Even so, it is likely that not all local harm could be avoided, mitigated or compensated for.
42. In the light of this I appreciate the local residents' concern at the lack of up to date detailed analysis of the impacts of an SRFI scheme at this stage. Nonetheless, the detailed effects of a specific proposal would be appropriately assessed through an Environmental Assessment. Bearing in mind that it is an assessment of a strategic level policy document, the Sustainability Appraisal/Strategic Environmental Assessment of the CS adequately assesses the likely impacts of a possible SRFI at this stage. Moreover, since the assessment is an integral and iterative part of the preparation of a DPD, there is no conflict of interest arising from its production by the same consultants who advised the Council on various matters relating to the Parkside SRFI proposal. The now abolished Strategic Rail Authority's 2004 *Strategic Rail Freight Interchange Policy* document [NP96] states that SRFIs "may not be considered suitable adjacent to uses such as residential", although based on my visits to the Parkside area I envisage that there is potential for an SRFI scheme to achieve adequate separation from residential properties.
43. The traffic implications of such a scheme would also be significant on both the M6 and local roads. However, whilst it has been pointed out that no evidence has been presented to demonstrate that a scheme would "work" in highway terms, there is also none which convincingly indicates that it could not do so. It is evident from the discussion at the Hearings that the Highways Agency's support in principle for an SRFI at Parkside is predicated on the majority of the employees arriving for/departing from shift work outside normal peak hours and mitigation measures in the form of infrastructure provision and/or demand management measures. Whilst I appreciate concerns about the lack of

certainty about these matters at this stage, they are issues most appropriately considered in determining a specific proposal. Moreover, there are a number of ways in which the likely traffic impacts of an SRFI could be restricted: conditions of a consent and/or a s106 agreement could control lorry routing, limit employee car parking spaces at the development, provide for non-car modes of travel and effectively restrict to acceptable levels the volume of traffic entering/leaving the site at certain times of day through, for example, the payment of 'premiums' for traffic movements in excess of a defined level. Whilst a Parkside SRFI would be likely to have substantial effects on the neighbouring Warrington and Wigan Boroughs neither have expressed any outstanding concerns of significance.

44. Weighing the precise balance of mostly national/regional benefits and predominantly local harm of an SRFI at Parkside can only be undertaken in the light of a specific proposal. However, it is to my mind a reasonable planning assumption that, notwithstanding the level of local opposition to an SRFI, the benefits of such a scheme **could potentially** clearly outweigh the harm it would cause to the Green Belt and any other harm and **could potentially** represent the sustainable development advocated by national policy. Thus, it is sound for the CS to identify the Parkside site as a strategic location with the potential for development as an SRFI, subject to the demonstration of the 'very special circumstances' necessary to permit inappropriate development in the Green Belt, whilst otherwise protecting the land as Green Belt. However, para 9.32J of the text accompanying policy CAS 3.2 states "It is considered that the benefits of the development outweigh the impacts on the Green Belt...". I am not persuaded that it is reasonable to reach this conclusion (which in any case appears to pre-determine criterion 1 of the policy concerning national Green Belt Policy tests) in the absence of an assessment of the benefits and disbenefits of a specific scheme. Consequently, in the light of my findings above, the Council's proposed change **MM9-21** ("It is considered that the benefits of the development could potentially outweigh the impacts on the Green Belt...") is also necessary to ensure that the plan is sound.
45. Points 1-12 of policy CAS 3.2 set out the criteria an SRFI scheme would need to meet to secure the support of the Council. Heritage impacts and the requirement for adverse impact on the Strategic Road Network to be mitigated and for a travel plan to be prepared/implemented are notable omissions and amendments **MM9-10, MM031 and MM032** to include these considerations, and to remove inconsistency between the requirements of points 5 and 8, are necessary to the soundness of the CS. Whilst the, in principle, opposition of many local residents to the policy remains strong, no other changes of significance to it, necessary to the soundness of the plan, have been suggested. The appearance of any development would be covered by the 'visual intrusion' criterion and the specific prohibition of the treatment of imported waste at the site is not necessary given that, even if brought in by rail, this would not accord with criterion 6. Specific reference to national policy documents is not necessary to the soundness of the CS.
46. In addition to supporting the principle of the use of land to the west of the M6 for an SRFI policy CAS 3.2 sets out criteria by which it would be determined if development of land to the east of the M6 (also indicated in Figure 9.2) for the same use would be supported – essentially that an SRFI is not deliverable

without use of this land and that the land to the west of the M6 is developed first. It would not be sound to completely rule out the possibility of development east of the M6 on the basis that a Railtrack SRFI proposal of more than 10 years ago would have only utilised the land to the west. However, given the eastern land's greater separation from the built-up area and its more isolated position in the Green Belt, policy CAS 3.2's approach to its development is appropriate. It would not be sensible to require only that development is "commenced" first on the land to the west of the M6 as this could result in some 'token' works on this land with the major part of the SRFI being developed only to the east of the motorway. Notwithstanding this point of principle, the phasing of the development to ensure its commercial viability is appropriately considered in relation to a specific proposal.

47. Bearing in mind that the area's Green Belt designation presumes against most forms of development in any case it is appropriate for policy CAS 3.2 to state that planning permission will not be granted for any use of the land shown in Figure 9.2 which would prejudice its use as a rail freight interchange. However, determining the extent to which a development on the site would prejudice an SRFI scheme and/or assessing whether, despite such prejudice, the benefits of this development would in any case warrant its approval, are most appropriately considered through the development management process. It would not be feasible for policy CAS 3.2 to set out the circumstances in which such development would be likely to be approved. Furthermore, whilst it is possible that an SRFI scheme would come forward which would require only part of the land indicated in Figure 9.2, the extent of land identified is appropriate given the potential for a SRFI of this scale to be developed on the site within the plan period. I can understand why many local residents would prefer the site to be used as a country park, although, bearing in mind the Council's contention that there is no evidence of a need for such a facility in the area and the minimal likelihood of its delivery, its omission from the CS does not make it unsound.
48. A number of very detailed arguments are put forward that, in relation to policy CAS 3.2, the CS is not legally compliant [HS020, HS044, EX124-EX166 and EX306-EX321]. However, having regard to the detailed responses of the Council [including M5-SHC-Supp] and the requirements of the relevant legislation I am satisfied that the CS is legally compliant in this respect.
49. Subject to the changes indicated above the identification of land at/around the former Parkside Colliery as a strategic location with the potential to facilitate the transfer of freight between road and rail is soundly based, supported by robust and credible evidence and is consistent with regional and national policy.

Issue 6 – Does the Core Strategy make appropriate provision for new housing, in terms of its amount, location, phasing and affordability, and is it supported by robust and credible evidence and consistent with regional and national policy?

The Amount, Location and Phasing of New Housing

50. RS Policy L4 requires St Helens to provide at least 10,260 new dwellings in the period 2003 to 2021 with an average completion rate of 570 dwellings per

year, net of clearance replacement. In the light of an analysis of population and household trends, migration patterns and labour market growth forecast projections [TP39D] the Council believes it is appropriate to maintain this completion rate (which is in support of the Borough's ambitious growth aspirations) to the end of the CS period and there is nothing to suggest that this is not a sound approach. Thus, policy CH 1 indicates that the net housing requirement for the period 2003 – 2027 is 13,680 new dwellings. For the plan period (2011/12 – 2026/27) the requirement is 10,320 dwellings. Fig 14.1 indicates that whilst more than 570 dwellings per year were completed in the years 2003/04 – 2006/07, less than this number were completed in the years 2007/08 – 2010/11, there being an overall deficit in the period 2003/04 – 2010/11. The Council's contention that this is primarily accounted for by the difficult economic conditions of recent years is a convincing one and there is nothing to suggest that it resulted from there being a lack of available and suitable sites for new housing.

51. The *2010 Strategic Housing Land Availability Assessment (SHLAA)* [TP35B], prepared alongside that for neighbouring Halton and Warrington Councils and the robustness of which is not challenged, identifies more than sufficient land to accommodate the requirement for housing in the first ten years of the plan period (including addressing the undersupply from the 2007/08 – 2010/11 period) and policy CSS 1 indicates the broad location of this, the majority (around 69%) of which will be, appropriately, in the main town of St Helens in support of the overall spatial strategy. The *Housing Land Position Statement 2003-2012* [TP01E] demonstrates that there are specific deliverable sites to accommodate in excess of 150% of the new dwelling requirement in the first five years of the plan period. However, whilst the CS expresses it in different terms, there is, in effect, a shortfall of land for some 1920 or so new dwellings in the period 2022-2027, accounting for around 19% of the total 2011/12 – 2026/27 plan period requirement.
52. Policy CH 1 identifies four possible ways of addressing the shortfall: releasing sites from other uses; increasing housing densities throughout the plan period and thus reducing the total land requirement for new dwellings; reconsidering the potential for housing of sites identified by the SHLAA as being possibly suitable for new dwellings subject to further investigation; and, if necessary, releasing land from the Green Belt. Para 14.16 of the CS explains that the Council is reluctant to consider releasing Green Belt land at this stage. This is a sound approach given that the shortfall in land for housing is at least ten years away, that the measures identified in policy CH 1 have the potential to eliminate or reduce the shortfall and that it is national policy that Green Belt land (which is shown to be much valued locally) should only be released in exceptional circumstances. However, to ensure clarity, the Council's proposed change **MM14-02**, indicating that the increased housing densities would be higher than those set out in part 6 of the policy, is necessary to the soundness of the plan.
53. Paras 6.2 and 6.10 of the text accompanying policy CSS 1 explain in detail the intended timescale and procedure for considering the case for releasing land from the Green Belt: relatively early in the plan period as part of the preparation of the Allocations DPD (which, in accordance with the definition set out in the NPPF, will be part of the Local Plan) and involving the sensible approach (in line with that advocated by RS policy RDF4) of it being

investigated on a sub-regional basis, including assessment of the potential for housing needs to be met in neighbouring districts. Para 6.10 has been through several iterations and, as evidenced by at least one representation in response to the *St Helens Core Strategy Accepted Changes Version (November 2011)* document, is ambiguous with the potential to be misunderstood. Given the importance of this paragraph, amendment **MM016** is necessary to the soundness of the CS and provides clarity as to when and how a review of Green Belt boundaries would be undertaken. The proposed amendment adequately details joint working with neighbouring authorities, explanation of the precise arrangements for which is not necessary to the soundness of the plan. The Council's proposed change **MM010**, which ensures consistency in wording between policy CSS 1 and its accompanying text, is also necessary to the clarity and soundness of the plan. Specific sites within the Green Belt which have been suggested as suitable for housing would be appropriately considered, alongside others, if and when release of Green Belt land is identified as necessary. The Council advised at the Hearings that there is no part of the Borough where there is a particular need for the new housing and, thus, it would neither be necessary nor sound to, at this stage, identify an 'area of search' in the Green Belt for new housing.

54. Policy CH 1 sets out the Council's objective of delivering at least 80% of new dwellings on previously-developed land over the plan period as a whole. Given the amount of derelict land in the Borough, the Green Belt designation of most land outside its existing built-up areas and the evidence of the SHLAA, this approach is a sound one and accords with the NPPF's core planning principle of encouraging the reuse of previously-developed land. However, there is the potential for confusion between points 3 and 8 of policy CH 1 and amendment **MM043** is required in order that the circumstances in which greenfield housing development would be permitted are clear and that the CS is thus sound. The Council's proposed changes **MM14-05** and **MM14-06**, which specify the appropriate densities for housing in locations well served by public transport and in/adjacent to town centres and explain the circumstances in which lower density development would be permitted, provide clarity important for developers, and are fundamental to achieving the Council's objectives for the re-use of previously-developed land. These changes are thus also necessary to the soundness of the plan.

Affordable Housing

55. The *Mid-Mersey Strategic Housing Market Assessment, October 2011* (involving St Helens, Halton and Warrington districts) [TP55D] identifies the Borough's need for affordable homes between 2011 and 2016. This broadly reflects the findings of the *2006 Housing Market and Needs Assessment* [TP20A] which recommended that, Borough-wide, at least 30% of the total capacity of all new residential development on suitable sites should be affordable. The *February 2009 Housing Viability Study* [TP36] assessed the viability of the 30% target under a range of market conditions: house prices being between 90% and 120% of their April 2008 value. Whilst the 30% affordable housing requirement would be unlikely to be economically viable at lower prices on many sites it would, in most cases, be viable under better housing market conditions. The *Housing Viability Study* also recommended that a threshold of five units for requiring affordable housing should be applied. Thus, in addition to supporting affordable housing provision by Registered Providers of Social

Housing, policy CH 2 sets out this requirement with the proviso that a relaxation will be considered if fully justified by an independent site-specific economic viability study. To avoid the need for separate, comparison, studies by both the developer and Council an independent study is appropriate. Thus, over the lifetime of the CS, and bearing in mind the relaxation proviso, the requirements of policy CH 2 are a sound basis for seeking to secure the maximum possible contribution towards meeting the overall identified need for affordable housing within the Borough.

Accommodation for Gypsies, Travellers and Travelling Showpeople

56. Policy CH 3 states that the Council will take account of identified needs for permanent pitches for Gypsies and Travellers and plots for Travelling Showpeople when determining planning applications for new, or the loss of existing, sites. It also indicates that the need for allocated sites will be reviewed and, if necessary, sites will be identified in the Allocations DPD. With reference to policies CP 1 and CP 2 the policy also sets out criteria that such sites should meet. The text accompanying the policy indicates that, despite a steadily growing population of Gypsies and Travellers, vacancies exist on several authorised sites and there is not a pressing need for new sites. Although the evidence produced as part of a, never adopted, partial review of RS [RP14] presents a somewhat different picture, there are no representations which suggest that the approach proposed by policy CH 3 is unsound. Moreover, the approach proposed accords with the March 2012 DCLG document *Planning Policy For Traveller Sites* which makes clear that it is for local planning authorities to make their own assessment of need for sites for Gypsies and Travellers and to identify a supply of deliverable and developable sites in their Local Plan.

Issue 6 - Conclusions

57. Subject to the changes indicated above the CS makes positive and appropriate provision for new housing, in terms of its amount, location, phasing and affordability, which is supported by credible evidence and is consistent with regional and national policy. In this respect the CS is thus sound.

Issue 7 – Does the Core Strategy provide a soundly based framework for economic growth and appropriate provision for new employment development which is supported by robust and credible evidence and is consistent with national policy?

The Amount and Location of Employment Land

58. As set out in the submission Core Strategy Policy CE 1 indicates that, to strengthen and diversify the Borough's economic base, at least 46 ha of land for new B1, B2 and B8 uses (primarily the latter) will be provided through identification of sites within the Allocations DPD, a review of 'surplus' B2 sites which could be reused for B1 or B8 and Parkside SRFI meeting an element of the demand for B8. Table 15.2 shows that an additional 41ha of land for B8 is forecast to be required by 2027 by the 'Labour Supply Local Housing Demand Variant' Scenario. A total supply of 9ha for such land is identified, none of which is deemed to be 'unconstrained'. Policy CE 1 also states that should the Parkside SRFI not proceed or be further delayed allocation to meet demand

will need to be identified, likely to mean an assessment of sites in the Green Belt.

59. At the Exploratory Meeting in August 2011 I explained my concerns about this approach given that no 'unconstrained' land suitable to meet the 41ha requirement for B8 could be identified and that there could be no certainty that the Parkside SRFI, which in any case would cater only for primarily rail-based B8 uses, would proceed. In light of this I was not persuaded that it would be sound for the CS to postpone identifying Green Belt sites to some undetermined point in the future. The Council argued that, having undertaken further analysis, policy CE 1 and its accompanying text misrepresented the latest situation with regard to the analysis of both the demand for and supply of additional land for B8 uses. It has thus proposed changes MM15-01, MM15-02, MM15-05 and MM15-06 which reduce the stated total B1, B2 and B8 land requirement to 37ha and remove references to this need being met by either the Parkside SRFI or Green Belt release. Changes MM15-08 – MM15-24 accordingly amend the accompanying text and tables. Proposed Table 15.4 identifies a plan period demand for 32ha of additional land for B8.
60. Although many authorities use different approaches to forecasting the demand for employment land there is no, in principle, challenge to the appropriateness, in St Helens' case, of the 'Labour Supply Local Housing Demand Variant' Scenario, developed over a number of years by Regeneris Consulting. However, it has been argued that a number of assumptions used in the scenario are inappropriate: in essence the proportion of 'large scale' (in excess of 100,000 sq ft) B8 developments likely to come forward, the floorspace per employee requirements for such development and the 'dampening effect' adjustments. Based on different assumptions using the same scenario, Peel Investments Ltd contends [HS027] that the requirement for additional employment land is 59ha.
61. It is common ground that forecasting requirements for employment land is not an exact science and that a figure within a realistic range is likely to be the most appropriate outcome of such modelling. The proponents of both the 32ha and 59ha figures argue these to be 'mid-point' requirements and I find the assumptions on which both figures are based to be, in their own rights, credible. If the 59ha requirement were to be catered for, including in the form of large sites close to motorway junctions, it is likely that 'land hungry', low employee density, very large scale B8 development would locate within the Borough. However, that is not to say that basing the CS on a 32ha additional B8 land requirement means that smaller scale B8 development (some of which, nevertheless, could be in excess of 100,000 sq ft), providing the employment required in the Borough, would not be attracted to, or could not be accommodated within, St Helens.
62. Moreover, it is apparent that larger scale B8 development is primarily 'footloose' and of regional, or at least sub-regional, significance. Whilst I find the evidence on the extent to which there is, in the long term, sufficient land identified in the region for large scale B8 development somewhat inconclusive, it is clear that there is, in the short-medium term at least, a significant amount of land suitable for such uses, including sites close to motorway junctions. The May 2011 GVA Study (*Housing and Economic Development Evidence Base Overview Study*) [SRP24], jointly commissioned by the Liverpool City Region

Partners, concludes that in the longer term there is the potential need to identify additional employment land supply in the City Region. Clearly there will be a need to carefully monitor the demand for and supply of employment land in the Borough. However, in the light of the above, there is not a persuasive case at this time that additional employment land provision in St Helens, over and above that proposed in the plan, is essential to the region's needs.

63. It is the case that the Council's proposed employment land requirement (when projected to 2031) is the lowest, in actual terms, of all the Merseyside authorities plus Halton and West Lancashire [HS027A]. However, when compared with population it is higher than that of Sefton. Furthermore, based on the discussion at the Hearings, it seems that the identified land requirements in these districts as much reflect the availability of suitable land as they do any consistent approach to forecasting the need for employment land, either of local or regional significance. It is also the case that the 37ha figure (32ha for B8 plus 5ha for B1) would be a lower level of provision than has been taken up for employment purposes in St Helens in recent years, although the Council argues that this is explained by significant 'spikes' in B8 developments and it is notable that the Borough already has one of the highest proportions of employees working in B8 uses in the region. However, the soundness of the plan is not dependent on the explicit statement of these facts in the document.
64. In the light of the concerns I raised at the Exploratory Meeting the Council commissioned additional work [TP57D], re-appraising the *St Helens Employment Land and Premises Study (May 2011)* [TP57], in order to more closely assess the suitability, availability and deliverability of the supply of employment land in the Borough. Whilst the Allocations DPD is the appropriate place in which to identify specific sites for employment use ¹, the results of the re-appraisal work (shown in proposed table 15.3 (MM15-17) indicate there to be a total of 86ha of land suitable for B1/B2/B8 purposes, 59 ha of which is suitable for small-medium scale B2/B8 uses and 15ha for large scale B2/B8 (on three sites), 10 ha (two of the three sites) being deliverable in the short-term. Doubts are expressed as to the suitability of these sites for modern B8 development. It is true that none have immediate access to motorway junctions, that one is close to residential properties and that at least two of them have layout constraints which could prevent the provision of 'cross-docked' facilities. On this basis some B8 developers are likely to find none of these sites suitable for their needs. However, bearing in mind that two of the sites are adjacent to existing, modern, large Sainsbury's and Co-operative warehouses, on apparently similar land, I envisage that they would be suitable for/attractive to many developers seeking land for large scale B8 development.
65. The constraints in St Helens are such that to provide additional employment land over and above the identified 86ha supply would require use of sites in the Green Belt. The preparation of a development plan is the appropriate time at which to review Green Belt boundaries and the NPPF identifies a key role of

¹ The CS does specifically refer to a small number of locations for employment development (eg land at Lea Green Farm East) which is appropriate given their size and potential strategic importance. There is also not persuasive evidence that these sites are unlikely to be developed for employment use during the plan period.

the planning system as being to contribute to building a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right place and at the right time to support growth and innovation. However, the NPPF is also clear that Green Belt boundaries should only be altered in exceptional circumstances and it is also relevant that para 14 of the document indicates that local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change, unless specific policies in the Framework (for example land designated as Green Belt) indicates that development should be restricted.

66. The 37ha of additional land required for B1/B2/B8 uses identified by the Council's proposed changes is based on robust and credible evidence concerning the potential for growth and employment needs. There is also evidence to indicate that sufficient/appropriate land exists in the Borough to meet this requirement and to accommodate most types of employment development which are likely to come forward. That an also credible case can be put forward for a significantly higher employment land requirement does not make the Council's proposed approach inappropriate, unjustified or unsound, particularly as the higher employment land requirement figure is, in effect, predicated on St Helens competing with neighbouring authorities to attract 'footloose', large scale B8 development of regional significance.
67. Equally, while some other authorities in the region have altered/are seeking alterations to the Green Belt to provide additional employment land, this does not, in itself, make St Helens' decision not to do so unsound, particularly in the light of the context of St Helens already having one of the highest proportions of employees working in B8 uses in the region. And, in any case, such an approach is proposed by the Council in respect of Green Belt land at Parkside, in view of its potential unique locational advantages for rail-based warehousing/distribution development of regional/national significance, demonstrating St Helens' positive approach to meeting regional/national development needs. Furthermore, given the lack of convincing evidence at this stage that the North West's regionally significant B8 employment needs cannot be appropriately met outside the Green Belt, it is unlikely that the exceptional circumstances necessary to alter St Helens' Green Belt boundaries to provide additional employment land could be demonstrated. An existing business located next to the Green Belt boundary is looking to expand. It is appropriate for this, and any other similar, proposal to be considered through normal development management procedures which can identify whether or not the very special circumstances exist which would, exceptionally, justify such development in the Green Belt.
68. In view of my conclusion that there is unlikely to be a case for releasing Green Belt land for employment use during the life of the Core Strategy it would be inappropriate for the document to set out 'triggers' which would indicate the need for such an action. However, notwithstanding this, the Delivery and Monitoring strategy provides a mechanism for identifying the need for any unanticipated or exceptional change to the plan's policies.

Re-use for other purposes of employment land

69. The Council's proposed changes MM15-03, MM15-24 and MM15-26 would result in a more positively-prepared and less excessively onerous policy (CE 1)

concerning the reuse of employment sites and they appropriately reflect the fact that some sites may not be suitable for future employment use. Exceptionally there may be instances when another use is deemed suitable for a site which, in principle, remains viable for employment use although it is appropriate for these to be considered on a case by case basis instead of through criteria set out in the CS.

Issue 7 - Conclusions

70. As originally set out policy CE 1 and its accompanying text is not supported by the most up to date evidence and is thus not a sound approach to developing the Borough's economy. However, with the Council's proposed changes identified above in place, the CS provides an appropriate economic growth framework for St Helens which, supported by robust and credible evidence and consistent with national policy, positively plans for meeting the Borough's economic development requirements. Changes **MM15-01 - MM15-03, MM15-05, MM15-06, MM15-08 - MM15-24 and MM15-26** are therefore necessary to the soundness of the CS. Notwithstanding the number of changes necessary in this regard I am satisfied that the overall thrust of the plan in relation to both employment land and the strategy as a whole is not significantly altered.

Issue 8 – Does the Core Strategy provide a soundly based framework, consistent with national policy, for ensuring quality development, safeguarding and enhancing quality of life and meeting the Borough's resource needs?

71. Policy CP 1 sets out criteria against which development proposals will be assessed to ensure that they are of an appropriately high quality with particular respect to the built environment, protection of the natural and historic environment, pollution control and resource management. The policy is positively prepared and supports many aspects of national policy set out in the NPPF, in particular requiring good design, promoting healthy communities, meeting the challenge of climate change and flooding and conserving and enhancing the natural and historic environment.
72. Policies CQL 1, CQL 2, CQL 3, CQL 4 and CQL 5 provide for safeguarding and enhancing quality of life in St Helens addressing, respectively, green infrastructure, trees and woodlands, biodiversity and geological conservation, heritage and landscape and social infrastructure. Although in terms of their requirements for new developments these policies to some extent repeat the contents of policy CP 1, this does not undermine the soundness of the plan. The policies also set out a positive framework for work by the Council and others to enhance quality of life in the Borough, including restoration of specific industrial sites, delivery of the Mersey Forest, completion of Conservation Area Appraisals and the preparation and adoption of a number of other DPDs, Area Action Plans and Supplementary Planning Documents.
73. Policy CR 1 indicates that the Council will seek to achieve a steady and adequate supply of minerals to ensure that the Borough contributes towards meeting the region's identified needs. It also states that Mineral Safeguarding Areas (MSAs) will be identified around deposits of coal, brick clay, sandstone and peat considered to be of current or future economic importance. The

Council's proposed modification **MM17-02** removes the reference to peat, and this change is necessary to the plan's accordance with the NPPF's guidance that Local Plans should not identify new or extended sites for peat extraction. Whilst national policy no longer specifically refers to safeguarding minerals of 'economic' importance (referred to in policy CR 1) it does state (NPPF para 143) that they should be of local or national importance which implies they should be of economic value. Ideally the MSAs would be identified in the Core Strategy although, despite the existence of British Geological Survey maps and the Coal Authority's surface coal resource maps, the Council indicates that further work is needed to identify the extent of MSAs and the text accompanying policy CR1 advises that this will take place in the Allocations DPD. The Council indicates [EX003] that the ultimately identified MSAs would be unlikely to 'sterilise', in the long term, significant areas of land identified within the CS's evidence base as necessary for development. It would therefore be counterproductive to delay adoption of the CS until MSAs have been identified. Policy CR 2 states that the Council will work with other Merseyside authorities and Halton Council in the preparation of a Joint Waste DPD and sets out measures to minimise waste and to promote its sustainable management.

74. Thus, subject to the modification indicated above, the CS provides a soundly based framework, consistent with national policy, for ensuring quality development, safeguarding and enhancing quality of life and meeting the Borough's resource needs.

Issue 9 – Does the Delivery and Monitoring Strategy provide an appropriate basis for monitoring the delivery and effectiveness of the Core Strategy's policies?

75. Appendix 1 sets out the CS's Delivery and Monitoring Strategy (DMS). It indicates the key delivery items by which each policy will be implemented and identifies the broad cost of, and the organisation responsible for, its delivery and the time frame in which it is anticipated this will be achieved. For most of the CS's policies there are also one or more indicators and targets, by which the extent to which the policy is achieving its aims will be measured. The DMS strikes an appropriate balance between providing for comprehensively monitoring the implementation of the CS and ensuring that this does not become an excessively time consuming, complicated or resource intensive activity.
76. The results of the monitoring will be reported each year in the Annual Monitoring Report and this will identify if and when any revision to the CS's policies is needed. The Council has proposed change **MM003** to explain the role of the Annual Monitoring Report in the Introduction Chapter and, as this is fundamental to an understanding of how any future review or revision of the CS will take place, the change is necessary to the soundness of the plan. Subject to this change the Delivery and Monitoring Strategy provides an appropriate basis for monitoring the delivery and effectiveness of the Core Strategy's policies.

Other Matters

77. A wide and extensive range of other matters were raised in written representations and at the Hearing sessions which do not go to the heart of

the soundness of the Core Strategy. Moreover, a number of these are matters which the Council is proposing to address through 'additional' modifications to the plan or, appropriately, in future DPDs. Having considered all the other points raised I find that there are no further changes needed to ensure that the plan is sound in terms of the requirements in the NPPF.

78. In addition to the main modifications I consider to be necessary the Council has proposed a number of other changes which it has described as significant or main modifications. Whilst I do not consider these to be necessary to the soundness of the plan (and have thus not recommended them) this does not mean that I consider them to be inappropriate. The Council would be free to make them as 'additional' modifications to the plan if it is satisfied that they do not alone, or together, materially alter its policies.

Assessment of Legal Compliance

79. My examination of the compliance of the plan with the legal requirements is summarised in the table below. Having careful regard to the detailed representations submitted in relation to legal requirements I conclude that the plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Core Strategy is identified within the approved LDS of April 2007 which sets out an expected submission date of June 2008. However, there has been significant slippage in the preparation of the plan since the adoption of the LDS resulting from a number of factors including the withdrawal of the Parkside SRFI planning application and the period of uncertainty regarding the status of the RS. An amended LDS is anticipated to be adopted shortly and in the meantime the revised progress in the preparation of the CS has been set out in the Annual Monitoring Report, that of December 2010 correctly forecasting submission of the document to the Secretary of State in May 2011. The Core Strategy's content is compliant with the adopted LDS and delays in submitting the CS are not a fundamental failing in the process.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in January 2007 and, notwithstanding some detailed variations, consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM).
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	Reports on Appropriate Assessment under the Habitat Regulations have been undertaken satisfactorily.
National Policy	The Core Strategy complies with national policy except where indicated and modifications are

	recommended.
Regional Strategy (RS)	The Core Strategy is in general conformity with the RS.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act and Regulations (as amended)	The Core Strategy complies with the Act and the Regulations.

Overall Conclusion and Recommendation

80. The plan has a number of deficiencies in relation to soundness and legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.

81. The Council has requested that I recommend main modifications to make the plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the St Helens Local Plan Core Strategy DPD satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the NPPF.

Malcolm Rivett

INSPECTOR

This report is accompanied by the Appendix containing the Main Modifications

Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission DPD (ie the *St Helens Local Development Framework Core Strategy Re-Publication Core Strategy Tracked Changes version, January 2011*), and do not take account of the deletion or addition of text. The text of the modifications below does not include previously deleted text shown in 'struckthrough' format in the January 2011 document. Text that was underlined in the January 2011 document (showing changes from previous versions) is shown here without underlining. In a small number of instances (eg MM027) these are main modifications to a previous 'additional' modification proposed by the Council. In these cases the text shown as to be altered incorporates the previously-proposed additional modification.

Ref	Page	Policy/ Paragraph	Main Modification
MM003	6	New para 1.19A	<i>[insert new paragraph 1.19A]</i> <u>Policies within the Core Strategy provide a balance between providing certainty and the need to build in flexibility to take account of changing circumstances over the plan period. The DMS is an essential tool in ensuring the effectiveness of the Core Strategy, acting as both an action plan and monitoring tool. The DMS will be monitored at least every year through the Annual Monitoring Report (AMR), which is the main mechanism for assessing the Core Strategy's performance and effectiveness. The AMR looks at performance for the period April to March every year and is issued by the end of December each year. It will identify where a policy is being effective or where a revision is needed. The successful monitoring of the Core Strategy will ultimately depend on drawing trends from data spanning a number of years.</u>
MM1-14	6	Para 1.21 bullet points 8 and 10	<u>List of Saved UDP St. Helens Unitary Development Plan (1998) Policies to be Replaced by the Core Strategy Background Paper The Core Strategy and the Regional Spatial Strategy Background Paper Impact of planned abolition of RSS</u>
MM1-15	7	Para 1.26	The adopted RSS (to be abolished) indicates that consideration should be given to the development of an inter-modal freight terminal in this broad location. Given the planned abolition of RSS, Policy CAS 3.2 now addresses this issue.
MM1-16	7	1.27, second bullet point	<input type="checkbox"/> Compliance with RSS (now revoked)
MM1-19	8	1.29C	Following publication of the Amendments Core Strategy in March 2010, <u>further revisions were required</u>

Ref	Page	Policy/ Paragraph	Main Modification
			to address issues that had arisen. the Council received notification from the Coalition Government that the North West Regional Spatial Strategy was to be abolished. As RSS forms part of the Local Development Framework, further changes were necessary to address its planned abolition. As a result of these planned changes, we have been advised to publish a revised version of the Core Strategy for representation. We have taken this opportunity to make changes to incorporate suggested revisions and update the Core Strategy where necessary.
MM2-02	16	Para 2.7	There are several key influences on the Core Strategy. These are described in full in the Strategic Fit Background Paper. The most important include: <ul style="list-style-type: none"> i. National Guidance ii. Regional Spatial Strategy (to be abolished) iii. Sub-regional Strategy iv. St.Helens Policy Context
MM2-04	16	Para 2.9	<i>[Reinstate text in paragraph deleted in January 2011:]</i> <u>RSS confirms St.Helens' position in the regional hierarchy, which influences the distribution of housing, retail policy and public transport framework. St.Helens' position in the outer part of the Liverpool City Region places emphasis on meeting local needs. Support is given to regeneration and improvement providing a complementary function to Liverpool City Centre.</u>
MM2-05	16	Para 2.10	2.10 The key RSS requirements for St.Helens were <u>are</u> : <ul style="list-style-type: none"> <input type="checkbox"/> Delivery of 570 dwellings per annum <input type="checkbox"/> Delivery of at least 65% of the housing requirement on previously developed land <input type="checkbox"/> Land at Newton-le-Willows is identified as an area of search for an inter-modal freight terminal <input type="checkbox"/> Continued investment in comparison retailing facilities in St.Helens Town Centre, to ensure a sustainable distribution of high quality retail facilities.
MM2-06	16	Para 2.10a	Where the evidence is justified, and not superseded my <u>by</u> more recent studies, the overall policy direction of RSS has been maintained in the Core Strategy despite the Government's plans to abolish Regional Spatial Strategies.
MM007	24	New para 3.10A	<i>[Insert new paragraph 3.10A]</i> <u>3.10A The Borough of St.Helens has almost equal proportions of urban and rural areas. The countryside surrounding the built-up area is designated as Green Belt, which protects it from inappropriate development. The overall spatial strategy seeks to direct future development to the urban areas and maintain the existing extent of the Green Belt. Sufficient land for development needs has been identified within the urban area for the short to medium term, however, beyond the first ten years of the plan</u>

Ref	Page	Policy/ Paragraph	Main Modification
			<u>period, removal of land from the Green Belt may be required to meet development needs.</u>
MM008	24	New para 3.10B	<i>[Insert new paragraph 3.10B]</i> <u>3.10B Any removal of land from the Green Belt will be informed by a study having regard to what is happening in the sub region. This review will take into account, amongst other factors, land supply and needs, and policy approaches across the sub-region. Where possible joint working will be undertaken to provide a coordinated approach.</u>
MM010	40	CSS1 part 1 (ii)	<u>In the first ten years of the plan Up to 2023/4, the majority (approximately 69%) of new residential development will be directed towards the regional town of St.Helens. The remainder will be directed towards Newton-le-Willows and Earlestown (approximately 23%), Haydock and Blackbrook (approximately 5%) and Rural St.Helens (approximately 3%);</u>
MM6-03	40	CSS1 Part 1 (iii)	<u>St.Helens Town Centre will maintain enhance and protect its market share within the region by securing further retail and leisure development opportunities. Applications for town centre uses providing greater than 500 square metres gross floorspace in an edge-of-town centre or out-of-town centre location will require an Impact Assessment.</u>
MM6-04	40	CSS1 Part 1 (iv)	<u>Earlestown will remain the second Town Centre within the Borough, whilst Rainhill and Thatto Heath will be classed as District Centres. Applications for town centre uses providing greater than 300 square metres gross floorspace in an edge-of-district centre or out-of-district centre location will require an Impact Assessment. The following will serve as Local Centres: Billinge; Chain Lane; Chancery Lane; Clipsley Lane; Eccleston; Fingerpost; Marshall's Cross; Newton-le-Willows; Newtown; Rainford; Sutton and Denton's Green. Applications for town centre uses providing greater than 200 square metres gross floorspace in an edge-of-local centre or out-of-local centre location will require an Impact Assessment;</u>
MM6-05	40	CSS1 Part 1 (v)	<u>The main focus for economic development will continue to be previously developed land in sustainable locations within the M62 Link Road Corridor in St.Helens and Haydock Industrial Estate.</u>
MM6-06	40	CSS1 Part 1 (vi)	<u>The reuse of previously developed land in sustainable locations will be prioritised through policy CH1 parts 3, 4 and 5 and the Allocations DPD;</u>
MM6-07	40	CSS1 Part 1 (ix)	<u>Elsewhere within the Green Belt area, development will be restricted to within existing settlement boundaries or major developed sites in the Green Belt;</u>
MM013	40	CSS1 part 1 (ix)	<u>Elsewhere within the Green Belt area, development will be restricted to within existing settlement boundaries or major developed sites in the Green Belt and outside of these areas development will comply with Green Belt policy;</u>
MM6-22	43	6.9	<u>St.Helens Town Centre is the major retail and service centre serving the Borough. It is was identified in the RSS as a second tier centre in the region, after Manchester and Liverpool, based on the (North West) Town Centre</u>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>Assessment Study. The policy seeks to maintain the role of St.Helens Town Centre as the key service centre for the Borough and a significant centre in the region. Earlestown maintains its Town Centre designation. All centres within the Borough have been assessed, in line with PPS4/PPG6 methodology, and given appropriate designations. The policy reflects these designations.</p>
MM015	43	6.9A	<p>The St.Helens & Earlestown Retail & Town Centre Uses Study 2011 recommends a range of locally set thresholds for the requirement of an Impact Assessment commensurate to the hierarchy of centres set out in CSS1. Where an Impact Assessment is required the applicant should agree the scope of the Impact Assessment with the Council at an early stage to ensure the Impact Assessment is proportionate to the scale of the proposed development and provides the required information to address the concerns of the Council. Applicants will still be required to demonstrate compliance with the sequential approach to development for all proposals for town centre uses located at the edge of or outside a defined centre. <u>The Allocations DPD will define the Earlestown Town Centre, district centre and local centre boundaries.</u></p>
MM016	43	Para 6.10	<p><i>[Delete existing paragraph 6.10 and replace with the following paragraphs:]</i></p> <p><u>6.10 The precise boundary of the Green Belt is currently defined by saved UDP policy S1 and is shown on the Proposals Map. It is envisaged that the general extent [see footnote 1] of the Green Belt will be maintained in the short to medium term (the first 10 years of the plan). Minor amendments to make the detailed Green Belt boundary more robust, and a review to address longer term land requirements, will be considered in the preparation of the Allocations DPD. However, the RSS approach of considering the land supply and needs of the sub-region as a whole is considered appropriate in order to see if needs can be met sustainably, including in neighbouring authority areas, before the release of Green Belt land is considered. Consideration needs to be given to the Liverpool City Region Cabinet Area (Halton, Knowsley, Liverpool, Sefton, St Helens, Wirral), the Eastern Housing Market Area (Halton, St Helens, Warrington) and other neighbours (West Lancashire and Wigan). The cumulative impact of individual authorities Green Belt releases in combination needs to be taken into account to ensure that impacts on the remaining Green Belt are minimised and that the release is the most sustainable approach.</u></p> <p><u>6.10A The assessment of land supply and need in the Liverpool City Region (the Liverpool City Region Housing and Economic Development Evidence Base Overview Study (May 2011)) will inform the Green Belt review. This found that housing and employment land supply is limited in several immediate neighbouring authorities that share employment and housing markets with St Helens. The</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>nature and extent of further work is yet to be agreed by the authorities. However, it is expected to involve discussions to determine whether or not any needs can be met in neighbouring authority areas (taking into account the findings of the Overview Study) and, if necessary, how to identify and phase Green Belt release in a sustainable manner that would not jeopardise urban regeneration. This work is likely to be undertaken in 2013 subject to approvals across the City Region.</u></p> <p><u>6.10B In relation to housing the Overview Study found that St Helens will be unlikely to meet the needs of neighbouring authorities and that, to only a limited extent, is its own undersupply likely to be able to be met by housing capacity in Liverpool and/or Wirral. The study concluded that, where demand cannot be redistributed, further supply will need to be identified to meet St Helens' own unmet needs beyond 2022/23 (as identified in the 2010 SHLAA) through appropriate planning actions. Policy CH1 sets out possible such actions, beyond which release of land from the Green Belt may be necessary and would be identified in the Allocations DPD.</u></p> <p><u>6.10C Evidence from the original 2009 Employment Land and Skills Review identified a potential shortage of land for B8 (warehousing) employment uses in St Helens, however further more recent research on both supply and demand has identified more supply and the potential for surplus existing employment land to be re-used to meet this shortfall. Overall, the evidence indicates that St Helens should be able to meet its needs for all employment land uses until at least 2027. RSS highlights Newton-le-Willows as an area of search for a regional rail freight facility as discussed in more detail in Policy CAS 3.2, Development of a Strategic Rail Freight Interchange at the Former Parkside Colliery.</u></p> <p><u>Footnote 1: The broad coverage of Green Belt in the area as defined in national policy</u></p>
MM106	45	Insert new policy CSD1 after para 6.14	<p><u>[Insert new policy CSD1 and supporting paragraphs 6.15, 6.16 and 6.17 after paragraph 6.14:]</u></p> <p><u>Policy CSD1</u> <u>National Planning Policy Framework - Presumption in Favour of Sustainable Development</u></p> <p><u>1. When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to seek solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</u></p> <p><u>2. Planning applications that accord with the policies in this</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>Local Plan (and, where relevant, with policies in other DPDs, AAPs and Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise.</u></p> <p><u>3. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</u></p> <ul style="list-style-type: none"> <li data-bbox="724 568 1477 725">i. <u>Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</u> <li data-bbox="724 730 1442 792">ii. <u>Specific policies in that Framework indicate that development should be restricted.</u> <p><i>[Create new table 6.4:]</i></p> <p><u>Strategic Aims met:</u> All</p> <p><u>Strategic Objectives met:</u> All</p> <p><u>Key Delivery Items:</u> <u>Determination of planning applications in line with planning policies</u> <u>Adoption of Sustainable Development and Allocations DPDs</u> <u>Adoption of a suite of SPDs and Development Briefs</u></p> <p><i>[Insert new paragraphs 6.15, 6.16 and 6.17:]</i></p> <p><u>Purpose</u> <u>6.15 Policy CSD1 ensures that the Core Strategy is based upon the presumption in favour of sustainable development, as required by the National Planning Policy Framework (NPPF).</u></p> <p><u>Justification</u> <u>6.16 The NPPF was published on 27 March 2012 and came into effect immediately. It contains a presumption in favour of sustainable development (“the Presumption”), which the NPPF states should be seen as a golden thread running through both plan making and decision taking. The Core Strategy is the principal planning policy document for St.Helens and the NPPF states that Local Plans should follow the approach of the Presumption so it is clear that development which is sustainable is approved without delay.</u></p> <p><u>6.17 Policy CSD1 ensures that the Core Strategy is based upon the Presumption, as required by the NPPF. The policies in the Core Strategy provide clear guidance on how the Presumption will be applied locally. The Core Strategy policies will be supplemented by the saved UDP policies (in accordance with their consistency with the NPPF) until</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<u>they are replaced by policies in other DPDs and AAPs, such as the Sustainable Development and the Allocations DPDs. Should Neighbourhood Plans be produced, their policies will also be relevant.</u>
MM8-02	56	CAS 2 second sentence	The Council will work to enhance the St.Helens Central Spatial Area as an accessible and welcoming destination for shopping, leisure, culture, tourism, employment and housing with a high quality built environment and maintain <u>its position in the regional hierarchy and where possible enhance its market share by:</u>
MM018	56	CAS 2, part 1	Providing around 20,000m ² (net) of additional comparison retail floorspace. <u>The Council's preference is for this to be through the redevelopment of the existing former Tesco superstore site on Chalon Way, and the enhancement of the existing Church Square shopping centre, and / or the development of other sequentially preferable sites in line with national policy and policy CSS1.</u>
MM019	56	CAS 2, part 3	Facilitating linked trips between the Primary Shopping Area and other existing and proposed developments within the St.Helens Central Spatial Area, including, <u>amongst others: Asda, the former Tesco superstore site on Chalon Way, St.Helens and Ravenhead Retail Parks, and the stadium site;</u>
MM8-04	57	Para 8.3	<i>[Reinsert para 8.3]</i> <u>Policy W5 of the RSS confirms St.Helens as one of the retail centres where comparison retailing facilities should be enhanced and encouraged to ensure a sustainable distribution of high quality retail facilities.</u>
MM027		CAS 3.1 part 4	4. Hope Academy will be considered for classification as a major developed site within the Green Belt through the Allocations DPD. The redevelopment of the former St.Aelred's Catholic Technology College will also be supported;
MM9-08	69	CAS 3.2 Third Paragraph	The Council will support Planning permission will be granted for the development of the site identified to the west of the M6 as a SRFI, provided that each of the following criteria are met:
MM9-10	69	CAS 3.2 criterion 2	Direct access to the site from the M6 for HGVs can be obtained avoiding use of Traffic Sensitive Routes identified in the Network Management Plan. <u>Adverse impacts on the Strategic Road Network will be mitigated;</u>
MM031	69	CAS 3.2 new criterion 3A	<i>[Insert new criterion 3A:]</i> <u>3A. Measures are incorporated which encourage travel to/from the site using sustainable transport modes, including access by public transport, cycle and foot, in accordance with Policy CP2. A travel plan will be essential;</u>

Ref	Page	Policy/ Paragraph	Main Modification
MM032	69-70	CAS 3.2 criterion 5 and 8 deleted and replaced	<p><i>[Old criteria 5 and 8 to be deleted and replaced by one new paragraph]</i></p> <p><u>5A. Significant adverse impacts from the development itself or associated road and rail access routes should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be adopted. Where adequate mitigation measures are not possible, compensatory measures should be considered and adopted (if appropriate). The aim should be to minimise any adverse impact. In applying this policy, a developer should address the following land use impacts as a minimum: environment; biodiversity/ecology; heritage; archaeology; agricultural land; community; quality of life; health; air quality; light; noise; visual intrusion; buffer zones; contributions to sustainable development; waste management; energy generation by renewable means; energy efficiency; water conservation and sustainable drainage; reuse of materials; traffic and sustainable transport; and remediation of land affected by contamination or surface hazards caused by past mining activity.</u></p>
MM9-14	70	CAS 3.2, text after criterion 12	<p>It is understood, however, that for operational, viability and commercial reasons a larger area of land extending to the east of the M6 motorway may also be required to accommodate an enlarged SRFI. It is considered that any expansion to the east would cover approximately 70 hectares of additional operational land, as shown indicatively in Figure 9.2. Planning permission <u>The Council will also be granted for support the development of land to the east of the M6 provided the above criteria are met plus the following additional criteria:</u></p>
MM9-17	75	9.24C	<p>The Government, however, intends to revoke Regional Spatial Strategies but the Council considers that all The evidence in support of a SRFI in this location which was heard at the Examination for the RSS <u>and</u> is still relevant and therefore provides support into the future. Their <u>aspiration to develop rail freight in the North West</u> is continued through into the Future North West: Our Shared Priorities document produced in draft form by 4NW and NWDA in August 2010.</p>
MM9-21	78	9.32J	<p>It is clear that the development of a SRFI at Parkside would represent inappropriate development in the Green Belt, there would be significant harm to the openness of the Green Belt (substantial impact on the functions of the Green Belt) and other harm as a result of built development. It is considered the benefits of such a development <u>could potentially</u> outweigh the impacts on the Green Belt as the five main purposes would to some extent be fulfilled and not be completely undermined in that location. Any development would, however, need to meet all of the criteria in policy CAS 3.2 to be considered acceptable <u>by the Council.</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
MM037	88	Fig 11.1	<i>[Delete "Existing Major Developed Site in Green Belt" symbol in figure 11.1, "Strategy for St.Helens Rural Area"]</i>
MM038	89	CAS 5 part 1	Development will be restricted to within existing rural settlement boundaries and within existing identified major developed sites. Outside of these areas development will comply with Green Belt policy;
MM039	89	CAS 5 part 2	<p>Bold Industrial Estate will continue to be identified as a Major Developed Site in the Green Belt. Other major sites within the Green Belt within the built curtilage of: Haydock Park Racecourse; Rainford High School; Carmel College; Hope Academy and Selwyn Jones Leisure Centre, together with other possible candidate sites, will be considered for designation as Major Developed Sites in the Green Belt, subject to an assessment using the following criteria:</p> <ul style="list-style-type: none"> i. The site is of significant size and characterised by a substantial identifiable core of buildings taking into account their footprint, height and volume ii. The site offers opportunities for limited infilling for continuing use without any greater impact on Green Belt openness and purposes. iii. The site has scope for partial or complete redevelopment, which offers opportunity for environmental improvements without any greater impact on Green Belt openness and purposes. Detailed boundaries and development criteria will be included in the Allocations DPD and Forest Park AAP and shown on the Proposals Map;
MM040	92	Para 11.13, first bullet point	<p><i>[Delete first bullet point of paragraph 11.13:]</i></p> <p>Development in the rural areas while limited will nevertheless be important in meeting broader objectives and includes:</p> <p>National Planning Guidance does not give a precise definition of Major Developed Sites in the Green Belt, although examples given provide some guidance. From this it can be expected that they would be large sites, normally accommodating a substantial built form and be in a well established use. Where such a site is identified, it may merit designation under part 2 criterion (ii) if it can be demonstrated that infill development will help to secure jobs, encourage tourism or support educational uses. In these cases, limited infilling may be possible without causing further harm to Green Belt openness and the purposes of including land within it. Infilling means the filling of small gaps between built development. The boundary of such sites will be defined by the present extent of the core built development. Substantial sites identified with potential for partial or completed development under criterion (iii), will need to demonstrate particular planning problems or opportunities for environmental improvements, which are most appropriately addressed through redevelopment. The precise number and boundaries of the Major Developed Sites in the Green Belt and any necessary</p>

Ref	Page	Policy/ Paragraph	Main Modification
			additional site specific development criteria will be defined in the Allocations DPD and Bold Forest Park AAP. Pending the production of these DPDs, the extent of the Bold Major Developed Site in the Green Belt will be the same as that identified by the St.Helens UDP saved policy GB3 and shown on the Proposals Map.
MM14-02	110	CH1 part 2A (ii)	ii. Increasing densities higher than those required in part 6, where appropriate and when considered necessary;
MM043	110	Policy CH1 parts 3 and 8	<p>3. Delivering at least 80% of new dwellings on previously developed land over the plan period as a whole <u>by only permitting new dwellings on a greenfield site where:</u></p> <p><u>i. It forms a minor part of a larger development site and is essential to the successful delivery of the development as a whole; or</u></p> <p><u>ii. It delivers an overriding significant social, economic and environmental benefit, and it complies with policies for the protection of open space; or</u></p> <p><u>iii. The application is for a barn conversion and it can be demonstrated that the site has been marketed for economic use for 2 years, to the satisfaction of the Council, and is not viable for these purposes; or</u></p> <p><u>iv. It meets an identified shortfall of land for housing....</u></p> <p>8. Prioritising the development of previously developed land. However, where the development relates to a greenfield site, it will be permitted where:</p> <p>i. It forms a minor part of a larger development site and is essential to the successful delivery of the development as a whole; or</p> <p>ii. It delivers an overriding significant social, economic and environmental benefit, and it complies with policies for the protection of open space; or</p> <p>iii. The application is for a barn conversion and it can be demonstrated that the site has been marketed for economic use for 2 years, to the satisfaction of the Council, and is not viable for these purposes; or</p> <p>iv. It meets an identified shortfall of land for housing.</p>
MM14-05	110	CH1 part 6	6. Requiring developments to achieve a minimum density of 30 dwellings per hectare (dph), and encouraging requiring higher density developments of 40 dph in sustainable locations, such as where well served by public transport and 50 dph within and adjacent to St.Helens and Earlestown Town Centres and where well served by public transport;
MM14-06	110	CH1 part 7	7. Only allowing developments to achieve density lower than those required by part 6 in exceptional circumstances or to Safeguarding the character of established residential areas from over-intensive and inappropriate new development;
MM14-10	111	14.3A	Given the Government's intention to abolish Regional Strategies, Local Planning Authorities will be responsible for establishing the appropriate level of housing provision in their area and for identifying a long term supply of housing land.

Ref	Page	Policy/ Paragraph	Main Modification
MM14-11	112	14.5A	<p>Despite the Government's intention to abolish RSS, tThe housing figures within <u>the RSS</u> it are still relevant to St.Helens due to the following main reasons:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The housing provision set out by the RSS was encouraged and supported by the Council; <input type="checkbox"/> The RSS was justified through research and its evidence base was tested through an Examination in Public, where it was considered sound; <input type="checkbox"/> The RSS target, which has been presented in earlier drafts of the Core Strategy, has not been challenged by any representations made through consultation; <input type="checkbox"/> The 2008-based ONS Household Projections project an annual average household change of 400 (2003-2028) for St.Helens; <input type="checkbox"/> RS2010's (which was intended to replace the RSS) research forecasts for St.Helens range from 529 dwellings p.a. to 776 dwellings p.a. (2006-2030); and <input type="checkbox"/> The RSS target is an annual average over a fifteen year plan period (rather than a minimum or maximum), so any periods of undersupply or oversupply delivery could be addressed over this long-term period.
MM15-01	126	CE1 Part 1	<p>Providing at least 37 <u>46</u> hectares of additional land to meet local needs for economic B1, B2 or B8 purposes to 2027. This will primarily be for B8 uses and will be met through:</p> <ul style="list-style-type: none"> i. The identification of a range of sites within the Allocations DPD. ii. Supporting the re-use, reconfiguration or redevelopment of vacant, derelict, or older employment land and premises for commercial purposes.
MM15-02	126	CE1 Part 2	<p>2. Should the SRFI at Parkside not proceed, or is delayed further, allocations to meet demand will need to be identified. This is likely to mean an assessment of sites within the Green Belt, which will be considered within a sub regional context.</p> <p><u>Supporting the development of a SRFI at Parkside, in line with policy CAS3.2, to meet a regional or sub regional need.</u></p>
MM15-03	126	CE1 Part 3	<p>Resisting the loss of land and premises currently or last used for B1, B2 & B8 purposes where they are suitable for continued use, re-use or redevelopment for B1, B2 & B8 uses.</p> <p>Sites suitable for B1, B2 or B8 uses are defined as:</p> <ul style="list-style-type: none"> – Having suitable road access; and – Having an acceptable impact on neighbouring land uses; and – Being economically viable in the medium to long term; and – (For re-use and redevelopment only) being in demand for B1, B2 or B8 in the medium to long term. <p><u>A. The reuse, reconfiguration or redevelopment of sites and premises last used for B1, B2 or B8 purposes for B1,</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>B2 or B8 uses will be supported where they have:</u> <u>(i) Suitable road access</u> <u>(ii) An acceptable impact on neighbouring land uses</u></p> <p><u>B. Where it is demonstrated that land or premises for B1, B2 or B8 purposes is no longer suitable or economically viable for B1, B2 or B8 use then the site's suitability for other employment generating uses must be considered before non-employment generating uses.</u></p> <p><u>Where there is a loss of B1, B2 or B8 land or premises to non-employment generating uses and where the site's area is greater than 1ha, then compensatory measures will be required by the Council, subject to economic viability</u></p>
MM15-05	127	CE1 Key Delivery Items	Provide <u>37 46</u> Ha of land for employment generating purposes by 2027
MM15-06	127	CE1 Key Delivery Items	Provide 37 Ha of land for <u>employment generating B1, B2 or B8</u> purposes by 2027
MM15-08	128	Para 15.3	<u>RSS policy W3, Supply of Employment Land, table 6.1, sets out the provision of employment land from 2005 to 2021 for the region. In the case of the Merseyside subregion it shows a need for 1728 Ha of land, an increase of 494 Ha from the 2005 base. This increase takes into account an 18.5% projected increase in up take and a 20% flexibility factor. The Government's overarching objective is sustainable economic growth in order to build prosperous communities, improve economic growth and tackle deprivation. PPS4 also aims to deliver more sustainable patterns of development, reduce the need to travel (especially by car) and respond to climate change.</u>
MM15-09	128	Para 15.4	<u>Liverpool City Region Overview Study The Liverpool City Region (LCR) Authorities and neighbouring Authorities appointed consultants to prepare the LCR Overview Study to assess the future housing and employment requirements across the Liverpool City Region. The Overview Study examines each authority's housing and employment land evidence base to identify potential surpluses and deficits that might exist. These are then assessed to identify if the demands of the sub-region can be met without the need to release land from the Green Belt. The study concluded that whilst St.Helens appeared to have a small surplus of employment land it was unlikely to be suitable for meeting the needs of neighbouring authorities. The Liverpool City Region Partners have appointed consultants to carry out the Liverpool City Region Overview Study to assess the future housing and employment land requirements over the Liverpool City Sub-Region. This study is due to report in December 2010.</u>
MM15-10	128	Para 15.5A	<p><u>[Insert new paragraph 15.5A after 15:]</u></p> <p><u>The approach set out by the Council was to draw on recent data on the supply of land and premises provided by the</u></p>

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			<u>St.Helens Employment Land & Premises Study May 2011 to inform the Labour Supply "Local Housing Demand Variant" scenario. To achieve this URS Scott Wilson and CBRE produced the Review of Employment Land in St.Helens to 2027 (September 2011) which re-appraised the Borough's employment land supply and provided commentary on the supply and demand for large-scale warehousing and distribution across the North West.</u>
MM15-11	129	Insert new paragraph 15.6A	<i>[Insert new paragraph 15.6A]</i> <u>Labour Supply "Local Housing Demand Variant" Scenario looks at forecast housing delivery over the plan period and considers how the Borough's population and workforce might change over the forecast period. The forecast is adjusted to account for development that has already taken place and to include a flexibility factor in order to make provision for unforeseen events and also to account for vacant units which may be present in the Borough.</u>
MM15-12	129	Insert new paragraph 15.6B	<i>[Insert new paragraph 15.6B]</i> <u>The forecast has shown a small level of growth for offices, a decline in demand for industrial premises and high-level growth in demand for warehousing and distribution premises.</u>
MM15-13	129	Update paragraph 15.7	<i>[Update paragraph 15.7]</i> <u>Due to a delay in the projected adoption of the Core Strategy the employment land projections were Labour Supply "Local Housing Demand Variant" scenario was recalculated in August 2010 so they in order to extend it to 2027. Further amendments then followed in 2011 taking into account the findings of the Review of Employment Land in St.Helens to 2027. The demand forecast for B8 has been split to reflect the mix of small, medium and large-scale industrial/logistics units identified by the Review of Employment Land in St.Helens to 2027. An appropriate employment floorspace density per employee was then applied. The result has been to make the scenario more reflective of the current supply of employment land within the Borough particularly in relation to meeting the need for warehousing and distribution over the life of the Core Strategy. The results of the revised forecast are summarised in the table below.</u>
MM15-14	129	Delete Table 15.2	<i>[Delete Table 15.2]</i>
MM15-15	129	Insert new paragraph 15.7A	<i>[Insert new paragraph 15.7A]</i> <u>Supply of Employment Land</u> <u>Review of Employment Land in St.Helens to 2027</u> <u>Additional work was carried out in August 2011 to reappraise</u>

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			<p><u>the supply identified in the St.Helens Employment Land & Premises Study May 2011 in order to assess more closely the suitability, deliverability and availability of the supply. This considered the impact of recent development, a market overview for both industrial (B2) and warehousing and distribution (B8) and a re-assessment of the assumptions in relation to the likelihood of development. The buildings in the Borough's current overall supply were split into three types:</u></p> <ul style="list-style-type: none"> <input type="checkbox"/> <u>Small sized industrial/ warehousing and distribution units (1000 sq ft to 15,000 sq ft)</u> <input type="checkbox"/> <u>Medium sized industrial/ warehousing and distribution units (15,000 sq ft to 100,000 sq ft)</u> <input type="checkbox"/> <u>Large sized industrial/ warehousing and distribution units (100,000 sq ft and above)</u>
MM15-16	129	Insert new paragraph 15.7B	<p><i>[Insert new paragraph 15.7B]</i></p> <p><u>Based on the study published in May 2011, 15% of the current overall supply is large-scale B8 warehousing and distribution premises. From the reappraisal a supply of 86.12 Ha was identified. Much of this is considered as being suitable for mixed B2 and B8, which reflects the reality that much of the overall supply is made up of mixed B2/B8 use sites, which are difficult to separate from each other. The supply of land is detailed in table 15.3 below.</u></p>
MM15-17	129	Insert new table 15.3	<p><i>[Insert new table 15.3 - see end of list of main modification]</i></p>
MM15-18	129	Insert new paragraph 15.7C	<p><i>[Insert new paragraph 15.7C]</i></p> <p><u>A total of 15.45 hectares of land in St.Helens has been identified as suitable for large scale B2/B8. Of this, 10.45 hectares is considered as immediately deliverable. In addition, 32ha of land was identified as potentially being suitable for some form of redevelopment for B8. However, these sites are considered to be "Windfall" with little certainty on when they may come forward. Because of this, they have not been included within the supply identified in the table above but their potential for redevelopment is apparent. Indeed, the Council is aware from pre-application discussions that some of these sites may become available in the future. The forecast negative need for B2 industrial supports this further.</u></p>
MM15-19	129	Insert new paragraph 15.7D	<p><i>[Insert new paragraph 15.7D]</i></p> <p><u>The Review of Employment Land in St.Helens to 2027 has also examined the supply of large-scale (100,000 square feet and over) industrial and warehousing sites and premises across the North West. It identified that there is a total of 590 hectares in the North West, of which 273 hectares are immediately deliverable. Based on past take-up this represents an adequate supply in the short to medium term (0-10 years). In the longer term (11-15</u></p>

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			<u>years), there is expected to be a short fall of around 74 hectares.</u>
MM15-20	129	Insert new paragraph 15.7E	<i>[Insert new paragraph 15.7E]</i> <u>A supply of 142 hectares of immediately deliverable land has been identified within neighbouring boroughs. This is considered sufficient for the short to medium term (0-10 years). There is potential for the proposed development at Parkside to meet some element of demand for regional scale rail linked warehousing. The proposed development at Parkside is not expected to come forward until the latter part of the plan period.</u>
MM15-21	129	Insert new paragraph 15.7F	<i>[Insert new paragraph 15.7F]</i> <u>In order to identify how the Borough can meet the forecast demand the supply is then considered. Information held by the Valuation Office Agency has been used to apportion the mixed B2/B8 supply against individual use classes so they can then be compared against the demand figures produced by the forecast and the balances between the two are then calculated. The balance between supply and demand is shown in table 15.4 below.</u>
MM15-22	129	Insert new Table 15.4	<i>[Insert new table 15.4 – see end of list of main modifications]</i>
MM15-23	129	Insert new paragraph 15.7G	<i>[Insert new paragraph 15.7G]</i> <u>The table above shows a total demand of 37 hectares (for B1, B2 & B8) and a total supply of 75 hectares (for B1, B2 & B8) which consists of a short term supply of 40 hectares and a medium to longer term supply of 35 hectares (for B1, B2 & B8). The table above shows that there is sufficient supply to meet the Borough's local employment land needs over the plan period. This could be supplemented further by around 32 hectares of "windfall sites" which have been assessed in terms of their suitability, although no assumptions have been made regarding the proportion which may come forward over the plan period. The Council will continue to monitor the take-up and supply of land to ensure sufficient land is provided to meet the Borough's needs.</u>
MM15-24	129-131	Delete Paragraphs 15.8 to 15.16 and Insert new Paragraph 15.17	<i>[Delete paragraphs 15.8 to 15.16]</i> <i>[Insert new paragraph 15.17]</i> <u>The Council will encourage and support the re-use and redevelopment of employment land and premises to meet the needs of modern business and provide employment for the Borough's residents particularly where there is suitable road access, no negative impacts on neighbouring land uses and they are well linked to the most deprived areas.</u>
MM15-26	131	Insert new paragraph 15.19	<i>[Insert new paragraph 15.19]</i> <u>It is acknowledged that in some instances employment land and premises may no longer be considered suitable or</u>

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			<u>viable for employment purposes and should be considered for other uses. Where the Council considers the site suitable for continued use, reconfiguration or redevelopment but an applicant considers this to be economically unviable, an assessment of economic viability and/or a marketing exercise over a period agreed with the Council would be required. The site's suitability for other employment generating uses should be considered before non-employment generating uses.</u>
MM17-02	146	CR1(2)	Mineral Safeguarding Areas will be identified around deposits of coal, brick clay, <u>and</u> sandstone and peat , considered to be of current or future economic importance.
MM107	155	Insert new CSD1 Key Delivery Items after paragraph 1.3 of Appendix 1	<p><u>CSD1 Key Delivery Items</u></p> <p><u>Item: Determination of planning applications in line with planning policies</u> <u>Cost and Funding: STHMBC</u> <u>Who: STHMBC</u> <u>Delivery: Ongoing</u> <u>Time Frame: Ongoing</u></p> <p><u>Item: Adoption of Sustainable Development and Allocations DPDs</u> <u>Cost and Funding: LDF Budget</u> <u>Who: STHMBC</u> <u>Delivery: As per latest LDS</u> <u>Time Frame: Adoption mid 2015</u></p> <p><u>Item: Adoption of a suite of SPDs and Development Briefs</u> <u>Cost and Funding: LDF Budget</u> <u>Who: STHMBC</u> <u>Delivery: As per latest LDS</u> <u>Time Frame: Adopted by various dates</u></p>
MM108	155	Insert new CSD1 Targets and Indicators	<p><u>CSD1 Targets & Indicators</u></p> <p><u>Item: Percentage of major planning applications determined within 13 weeks.</u></p> <p><u>Baseline: 2011/12: 77.42%</u> <u>Target: As per latest St.Helens Performance Indicator Target, was 71% for 2011/12</u> <u>How: AMR</u></p> <p><u>Item: Percentage of minor planning applications determined within 8 weeks.</u></p> <p><u>Baseline: 2011/12: 94.58%</u> <u>Target: As per latest St.Helens Performance Indicator Target, was 88% for 2011/12</u> <u>How: AMR</u></p> <p><u>Item: Percentage of other planning applications determined</u></p>

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			<p><u>within 8 weeks</u></p> <p><u>Baseline: 2011/12: 96.85%</u> <u>Target: As per latest St.Helens Performance Indicator Target, was 95% for 2011/12</u> <u>How: AMR</u></p> <p><u>Item: Percentage of appeals allowed against the authority's decision to refuse planning applications.</u></p> <p><u>Baseline: 2011/12: 18%</u> <u>Target: As per latest St.Helens Performance Indicator Target, was 30% for 2011/12</u> <u>How: AMR</u></p>
MM104	209	Appendix 4.3	Policy: GB3 Major existing development sites in the Green Belt- Policy retained Policy deleted

TABLE 15.3

	B1(a) Office (Ha)	Small/Medium Scale B2/B8 (Ha)	Large Scale B2/B8 (Ha)	Total (Ha)
Immediately deliverable in Short Term*	11.15	24.62	10.45	46.22
Potentially Deliverable in Medium/Long Term*	0.00	34.90	5.00	39.90
Total (Ha)	11.15	59.52	15.45	86.12
* Study commissioned in 2010 with a Core Strategy end date of 2026 but later changed to 2027				

TABLE 15.4

Balance of Supply and Demand to 2027					
	Demand (Ha)	Short Term Supply (Ha)	Medium/Long Term Supply (Ha)	Total Supply (Ha)	Balance (Ha)
B1 Office (2- storey)	+5	10	0	10	+5
B2 Manufacturing	-18	13	15	28	+46
B8 Warehousing	+32	17	20	37	+5
Includes the following correction factors: 20% safety margin (increases demand); 20% to account for growth in 2006 to 2011 (reduces demand); and 14% vacancy rate (reduces supply).					