

# St Helens Local Plan SA

## SA Report Addendum: Appraisal of Modifications

November 2021

## Quality information

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## Appendix A: Screening the Proposed Modifications

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# Non-Technical Summary

## Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the St Helens Local Plan. SA is a mechanism for considering and communicating the likely effects of the plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the Local Plan is a legal requirement.

This is a Non-Technical Summary (NTS) of this third SA Report Addendum, which is an Addendum to the full SA Report published in 2019 [Exam ref: SD005].

The aim of the SA Report Addendum is essentially to present information on the proposed modifications, and alternatives where appropriate, with a view to informing the forthcoming consultation and subsequent plan finalisation.

## Scope

The scope of the SA work, with respect to the St Helens Local Plan, is introduced within the SA Report published in 2019 [Exam ref: SD005]. Essentially, the scope is reflected in a list of sustainability topics and objectives, which collectively provide a methodological 'framework' for appraisal. The SA objectives are grouped into topics as detailed in Table 1 below.

**Table 1: Sustainability Topics**

<b>Sustainability Topic</b>	<b>SA objectives covered</b>
<b>Biodiversity and geodiversity</b>	SA1 Biodiversity
<b>Land quality</b>	SA2 Land quality
<b>Traffic congestion and air quality</b>	SA3 Air Quality      SA19 Transport
<b>Natural resources</b>	SA4 Water resources      SA11 Waste
<b>Climate change and energy</b>	SA5 Climate change      SA10 Energy
<b>Flooding</b>	SA6 Flooding
<b>Landscape</b>	SA7 Landscape
<b>Built and natural environment</b>	SA8 Historic environment
<b>Health and Wellbeing</b>	SA9 Access to open space      SA12 Health      SA18 Crime SA17 Social inclusion      SA20 Access to services
<b>Economy and Employment</b>	SA13 Education      SA14 Employment      SA15 Economy
<b>Housing</b>	SA16 Housing

## Screening of Proposed Modifications

The Council is proposing a number of main modifications to the submitted Local Plan as a result of the examination hearing sessions and representations received. It is necessary to screen the modifications to determine if they significantly affect the findings of the main SA Report [Exam ref: SA005] and if further appraisal work is therefore required.

All of the proposed main modifications were screened to determine if further SA work was required or if they could be screened out from further appraisal work.

The proposed changes and detailed findings of the screening including the rationale for why a main modification was screened in or out are provided in Appendix A of this SA Report Addendum.

The majority of modifications involve minor edits to the Plan text for clarification, factual correction, to enhance readability or other minor reasons and have therefore been screened out as not being significant in terms of the SA, i.e. they would be inherently unlikely to give rise to significant effects or affect the overall conclusions.

The screening of the proposed main modifications (Appendix A) found that the majority of modifications would not have a significant effect on the findings of the previous SA work presented in the main SA Report [Exam ref: SD005]. This is because the changes do not fundamentally alter the thrust of the policies.

Only the following Modifications were identified that required further consideration in the SA at this stage. These are as follows:

### **Removal of site allocations (MM007 / MM008 / MM009 / MM010)**

The following sites are no longer allocated in the Plan: 2EA, 3EA, 10EA, 11EA and 3HA

### **Changes to site profiles (MM044 / MM045)**

Amendments have been made to the site profiles for several allocations.

### **Parkside West Policy (MM017)**

A new policy has been written.

### **Bold Forest Garden Suburb Policy (MM018)**

A new policy has been written.

## **Consideration of alternatives**

The Council explored whether there were any reasonable alternatives in relation to the proposed main modifications. It was considered that no alternatives were reasonable or needed to be appraised through further SA work.

## **Appraisal of Modifications**

The appraisal findings identified that the main modifications would lead to some minor positive effects on specific SA Objectives.

In relation to the overall effects for the Local Plan, the findings remain the same for all SA topics with the exception of 'Traffic, congestion and air quality'. For this objective, the combined effects of the modifications could potentially reduce the effects from 'significantly negative' to 'minor negative', but a degree of uncertainty remains.

The changes relate to improved clarity around the requirements for travel at each of the allocated sites, and also reflect the fact that several allocated sites have been removed from the Plan (and so the effects are not directly attributable to the Local Plan as such).

## Mitigation and enhancement

No further mitigation or enhancement measures were identified at this stage.

## Monitoring

Monitoring measures set out in the SA Report remain appropriate. No new significant effects have been identified as a result of the Modifications.

## Next Steps

Following consultation, the Inspector will consider all representations received, before deciding how to report on the Plan's soundness. Assuming that the Inspector is ultimately able to find the Plan 'sound', it will then be adopted by the Council. As soon as reasonably practicable after the adoption of the Local Plan, an 'SA Statement' will be published that explains the process of plan-making/SA in full, including the measures to be taken to monitor the significant environmental effects of implementation of the Plan.

# 1. Introduction

## Background

- 1.1 St Helens Council is preparing a new Local Plan for St Helens. The Plan is at an advanced stage, having gone through various rounds of consultation and is currently at public examination.
- 1.2 A number of modifications are being proposed to the Local Plan. It is important to explore whether these changes will affect sustainability appraisal findings.

## Sustainability Appraisal (SA)

- 1.3 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the St Helens Local Plan. SA is a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.

## Purpose and Structure of this SA Report Addendum

- 1.4 The aim of this SA Report Addendum is to present information on the proposed main modifications (and alternatives where appropriate) with a view to informing further consultation and subsequent plan finalisation.
- 1.5 This report is known as an SA Report 'Addendum' on the basis that it is an Addendum to the SA Report published in 2019 [Exam ref: SD005]. This SA Report Addendum is structured as follows:
  - **Section 2** - presents the scope of the SA;
  - **Section 3** - explains the method and presents the findings of the screening of proposed modifications;
  - **Section 4** - sets out consideration of alternatives;
  - **Section 5** - sets out an appraisal of the screened in Modifications;
  - **Section 6** - considers mitigation and enhancement; and
  - **Section 7** - discusses the next steps.

# 2. What's the scope of the SA?

## The SA Framework

- 2.1 The scope of the SA work, with respect to the St Helens Local Plan, is introduced within the SA Report published in 2019 [Exam ref: SD005]. The scope is reflected in a list of sustainability objectives, which collectively provide a methodological 'framework' for appraisal. The SA topics and objectives are listed below in Table 2.1 It has not been necessary to update or revise the SA framework for the purposes of appraisal work at this stage.

**Table 2.1: The SA Framework**

<b>SA Topic</b>	<b>SA Objectives</b>
<b>Biodiversity, Fauna and Flora</b>	SA1. To Protect and enhance biodiversity and geodiversity.
<b>Land quality</b>	SA2. To protect and improve land quality in St Helens.
	SA3. To improve air quality in St Helens.
<b>Traffic congestion and air quality</b>	SA19. To reduce the need to travel, encourage alternatives to the car and other motor vehicles, improve highway safety and make the best use of existing transport infrastructure.
	SA4. To maintain and enhance the quality of controlled waters and to sustainably manage water resources.
<b>Natural resources</b>	SA11. To reduce the amount of waste, and in other of priority, the proportion of waste reused, recycled and composted or recovered.
	SA5. To mitigate and adapt to the impacts of climate change.
<b>Climate change and energy</b>	SA10. To minimise energy use and increase the proportion of energy both purchased and generated from renewable and sustainable sources.
<b>Flooding</b>	SA6. To minimise the risk of flooding from all potential sources and ensure there is no residual risk to people and properties.
<b>Landscape</b>	SA7. To protect, enhance and make accessible for enjoyment, landscapes, townscapes and the countryside.
<b>Built and natural environment</b>	SA8. To protect, enhance and make accessible for enjoyment, the cultural heritage and historic environment.
	SA9. Ensure access to and enhancement of high quality public open space and natural greenspace.
	SA12. To improve health and reduce health inequalities.
<b>Health and Wellbeing</b>	SA17. To reduce poverty and social exclusion.
	SA20. To improve access to and use of basic goods , services and amenities in town and local centres.
	SA18. To reduce crime, disorder and the fear of crime.

**SA Topic****SA Objectives**

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**Economy and  
Employment**

SA13. To improve the education and skills levels of the population overall.

SA14. To ensure local residents have access to employment opportunities.

SA15. To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.

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**Housing**

SA16. To improve access to a range of good quality and affordable housing that meets the diverse needs of the borough.

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# 3. Screening of Proposed Modifications

## Introduction

- 3.1 A number of Main Modifications to the submitted Local Plan are proposed as a result of the examination hearing sessions and representations received. It is necessary to screen the modifications to determine if they could significantly affect previous SA findings and if further appraisal work is therefore required.

## Method

- 3.2 All of the proposed main modifications were screened to determine if further SA work was required or if they could be screened out from appraisal. The findings of the screening exercise, including the rationale for why a main modification was screened in or out, are provided in Appendix A.
- 3.3 The majority of proposed main modifications involve relatively minor edits to the Plan text for clarification, improved alignment with the most up to date versions of national policy and guidance, to update the Plan to account for the passage of time since the Local Plan Submission Draft was initially published in 2019 and have therefore been screened out as not being significant in terms of requiring further exploration through the SA (i.e. they would be inherently unlikely to give rise to significant effects).
- 3.4 A number of modifications are also required to the Plan as a result of MM001, which is to extend the Plan period by two years, from 2035 to 2037 to ensure a 15 year Plan period looking forward on adoption of the Plan. This has required the housing and employment requirements to be updated by simply adding two more years of requirement based on the existing requirement (primarily seen in MM007 and MM009, with a minor reference in MM021). The underlying approach to calculating the housing and employment requirements has not changed, and it is important to note that the addition of two years to the Plan period has not resulted in any changes to the proposed allocations in the Plan. Therefore, the extension of the Plan period by two years and the associated changes to the housing and employment requirements have been screened out from further appraisal at this stage.
- 3.5 Where modifications are identified as potentially giving rise to significant effects, the additional appraisal work has been undertaken to determine:
  - 1. The nature of effects that the modifications will have (i.e. are they positive or negative, and what is their significance?)
  - 2. Whether the modifications (when considered in combination) have implications for the overall SA findings for each SA Topic.
- 3.6 Primarily, the SA findings are set out in the main SA Report [Exam ref: SD005] and subsequent SA Addendums (Exam ref: SD005.4 and SD005.5).

## Screening Findings

- 3.7 The screening of the proposed main modifications (**Appendix A**) found that the majority of modifications would not have a significant effect on the findings of the previous SA work presented in the SA Report (2019) [Exam ref: SD005] and SA

Addendums (Exam ref: SD005.4 and SD005.5). This is because the changes do not fundamentally alter the thrust of the policies.

- 3.8 Several Modifications have been identified as requiring further consideration through the SA process. These are as follows:

**Removal of site allocations (MM007 / MM008 / MM009 / MM010)**

Several sites that were identified as allocations in the plan have been removed as they are either under construction or complete. This includes sites *2EA, 3EA, 10EA, 11EA and 3HA*. Whilst these effects will still arise / have already arisen, they are not directly attributable to the Local Plan policies. The appraisal should therefore be amended to take this into account, but also taking account of the changes to the baseline position (i.e. the locations where sites have been developed could now be more sensitive to further change).

**Changes to site profiles (MM044 / MM045)**

Site profiles have been amended for several of the allocated and safeguarded sites. This has implications for the Plan effects because changes to the requirements on sites could mitigate effects or lead to new effects arising.

**MM017 New Policy: Parkside West LPA12**

Guidance and requirements have been included within the Plan through the inclusion of a new policy dealing with the Parkside West site allocation. It is necessary to explore how these changes could affect the SA findings (i.e. will it mitigate previously identified negative effects, or lead to entirely new effects arising whether positive or negative).

**MM018 New Policy: Bold Forest Garden Suburb LPA13**

Guidance and requirements have been included within the Plan through the inclusion of a new policy dealing with the Bold Forest Garden Suburb site allocation. It is necessary to explore how these changes could affect the SA findings (i.e. will it mitigate previously identified negative effects, or lead to entirely new effects arising whether positive or negative).

- 3.9 Each of these Modifications have been considered in further detail; covering the following elements:

- Consideration of reasonable alternative approaches
- Appraisal against the SA framework
- Potential for mitigation / enhancement
- Monitoring

## 4. Consideration of alternatives

- 4.1 For each Modification, the potential for alternative approaches was considered. This is discussed below.

### **Removal of site allocations (MM007 / MM008 /MM009 / MM010)**

- 4.2 The sites that are no longer allocations still form part of the employment and housing supply position, and therefore in this respect, the overall amount and distribution of growth remains the same. Alternative growth strategies and site options have been appraised throughout the plan-making process and no further work is necessary.

### **Changes to site profiles (MM044 / MM045)**

- 4.3 The proposed changes to site profiles have been made in response to specific issues and suggestions and to meet the tests of “soundness” set down in national policy. This has shaped the proposed modifications, and there is limited scope for alternative approaches.

### **Parkside West Policy (MM017)**

- 4.4 A new policy has been written to address specific planning factors relating to the Parkside West allocation, taking account of the site profile for the allocation and existing policy requirements elsewhere in the Plan applicable to this site. The content is driven in response to particular issues, suggestions and existing policy requirements, and there are no reasonable alternatives.

### **Bold Forest Garden Suburb Policy (MM018)**

- 4.5 A new policy has been written to address specific planning factors relating to the Bold Forest Garden Suburb allocation, taking account of the site profile for the allocation and existing policy requirements elsewhere in the Plan applicable to this site. The content is driven in response to particular issues, suggestions and existing policy requirements, and there are no reasonable alternatives.

## 5. Appraisal of the modifications

- 5.1 The Main Modifications that are 'screened-in' have been appraised in further detail against the full SA Framework. The results are presented below under each Modification and then cumulatively.

### **Removal of site allocations 2EA, 3EA, 10EA, 11EA and 3HA (MM007 / MM008 / MM009 / MM010)**

- 5.2 Site 3EA was identified as potentially giving rise to minor negative effects with regards to biodiversity, given the proximity of wildlife sites. These effects would no longer arise in association with the Local Plan given that planning permission for the site is already granted, with development on the majority of the site complete.
- 5.3 Minor negative effects associated with a loss of agricultural land at site 2EA still occurred (the site is now complete), but given that the site has been removed as an allocation, these are not attributable to the Local Plan. This has a limited influence on the overall impacts of the Plan in relation to land quality.
- 5.4 In terms of the effects upon air quality, several of the sites that have been removed from the Plan as allocations were considered likely to contribute to potential significant negative effects. As these sites are either complete or under construction, there is a greater degree of certainty that measures will be secured to mitigate significant effects. Therefore, the direct effects of the Plan in relation to air quality ought to be reduced (though the baseline position has changed and the threshold for triggering significant effects is somewhat reduced).
- 5.5 Carbon emissions associated with employment growth at sites 2EA, 3EA, 10EA and 11EA will arise irrespective of the Plan. Therefore, despite their removal as allocations, levels of carbon emissions are likely to remain similar. Indeed, given that these locations are under construction or completed, the potential to achieve higher sustainability standards through the application of Plan policies no longer exists. On balance, the implications for the SA findings in relation to climate change are neutral.
- 5.6 These modifications have limited implications in terms of flood risk, which was not a particular issue for any of the removed allocations.
- 5.7 With regards to landscape and townscape, the employment sites at Haydock were identified as potentially having minor negative effects. Given that these sites are already under construction, the baseline position has changed and the effects on landscape character in this location are not associated with the Plan as such. Likewise, positive effects attributed to sites in the urban area (3HA / 11EA) will still arise, but these form part of the baseline (given that construction is underway). Therefore, the significant positive effects identified as a result of the Local Plan allocations will also be reduced slightly.
- 5.8 Removing several allocations reduces the contribution that these sites have towards positive effects on the economy and employment. However, these sites still form a part of the land supply, and the Plan is expected to contribute towards further positive effects on the economy.

### **Changes to site profiles (MM044 / MM045)**

- 5.9 Greater clarity is provided in relation to the need for suitable access to the allocated sites by walking, cycling and public transport. Furthermore, the site profiles have

been amended to ensure that internal permeability is strengthened. This will have positive effects in relation to transport, congestion and air quality issues (and is an improvement on the Local Plan Submission Draft 2019).

- 5.10 Specific additional requirements have been added in relation to site 6EA to ensure that impacts on landscape and heritage are minimised. Likewise, specific mention of the need to address flood risk is added for site 5EA and the need for landscape impact mitigation is added for site 2ES. These amendments will reduce the magnitude of negative effects in these locations, but the effects were not considered to be significant anyway.

#### **Parkside West (MM017)**

- 5.11 A new policy has been written to address specific planning issues relating to the Parkside West allocation.
- 5.12 Potential minor negative effects in relation to biodiversity have been identified in association with the Parkside development. The new policy states that there will be a need to positively manage existing and new environmental assets. Whilst this does not refer explicitly to biodiversity, it is likely to have some beneficial effects when taken in combination with the other Plan policies. The overall effects in relation to biodiversity are predicted to remain the same.
- 5.13 The SA Report identifies potential negative effects in relation to air quality and traffic in the short term in relation to the Parkside allocations. The new policy includes several requirements relating to the management of traffic and air quality, as well as the provision of sustainable modes of transport, which should help to mitigate these effects further.
- 5.14 The new policy mirrors the requirements in the Parkside East policy in setting out the need to put training schemes in place where practicable. This is beneficial in terms of health and wellbeing, and economy and employment.

#### **Bold Forest Garden Suburb Policy LPA13 (MM018)**

- 5.15 The new policy provides a clearer approach with regards to the provision of social infrastructure and support for active travel, which is positive with regards to health and wellbeing.
- 5.16 The policy is more positive in terms of traffic, congestion and air quality as it provides stronger requirements in relation to new bus stop locations, permeable routes through the site and access. This could have benefits in terms of reducing carbon emissions too.
- 5.17 The requirement to achieve 10% of energy requirements from renewable sources has been added to the policy, which is positive. However, this requirement is already in place through policy LPC13, so the outcomes are unlikely to be any different in this respect.

#### **Cumulative effects of the Modifications**

- 5.18 Several modifications will lead to slight improvements with regards to biodiversity. These changes are minor though and do not lead to any changes in relation to the overall findings, which remain as significant positive effects.
- 5.19 In relation to land quality, the loss of agricultural land associated with the Plan allocations is reduced, owing to several sites no longer being allocated. Whilst this is positive, there will remain minor negative effects in relation to the loss of land at

other site allocations and safeguarded sites. Therefore, the overall findings remain relatively unchanged.

- 5.20 Several modifications are likely to help mitigate negative effects relating to traffic, congestion and air quality. This is partly due to several sites being removed as allocations (and therefore the effects not being associated directly with the Plan), and new policies setting out additional requirements in relation to transport. In combination, these changes reduce the magnitude of effects relating to traffic congestion and air quality, which means that the overall effects are less likely to be significantly negative.
- 5.21 The modifications have no significant implications with regards to natural resources, climate change and energy.
- 5.22 Slight improvements are recorded in relation to flooding due to additional criteria being added to the site profile for 5EA. Whilst this is a positive change, significant positive effects were already predicted in the SA Report overall (and this remains the same).
- 5.23 Improvements are noted with regards to landscape, due to additions to the site profile for 6EA and 2ES. Furthermore, several sites have already been constructed / are under construction, so any negative effects relating to these sites now form part of the baseline position. Minor negative effects remain overall as these relate to effects in other locations across the borough.
- 5.24 The modifications lead to minor improvements with regards to health and wellbeing, but this does not change the overall findings (which are already significantly positive).
- 5.25 Changes to the boundary for site 7HA reduce the amount of dwellings to be delivered on site, but this does not have a significant effect on the overall SA findings.

**Table 5.1: Summary of SA findings**

Topic	Overall Findings in the SA Report	Pre-submission modifications	Main Modifications	Overall findings post Examination
Biodiversity and Geodiversity	Significant positive effect	No change	Less negative	Significant positive effect
Land quality	Minor negative effects Minor positive effects	No change	Less negative	Minor negative effects Minor positive effects
Traffic congestion and air quality	Uncertain significant negative effects Minor positive effects	Less negative	Less negative	Uncertain Minor negative effects Minor positive effects
Natural Resources	Neutral effects	No change	No change	Neutral effects
Climate change and energy	Uncertain significant positive effect	No change	No change	Uncertain significant positive effect

Topic	Overall Findings in the SA Report	Pre-submission modifications	Main Modifications	Overall findings post Examination
Flooding	Significant positive effect	No change	Improvement	Significant positive effect
Landscape	Minor negative effects Significant positive effect	No change	Less negative	Minor negative effects Significant positive effect?
Built and natural environment	Minor negative effects Minor positive effects	Less negative	No change	Minor negative effects Minor positive effects
Health and Wellbeing	Significant positive effects	No change	Improvement	Significant positive effects
Economy and employment	Significant positive effects	No change	Less positive	Significant Positive Effect
Housing	Significant positive effects	No change	Slightly less positive	Significant Positive Effect

## 6. Mitigation and enhancement

- 6.1 Some modifications have been made in response to negative effects being identified, and the changes rectify these issues. In this respect, no further mitigation or enhancement is necessary. For example, measures have been implemented to minimise landscape and heritage impacts at site 6EA.
- 6.2 Where changes have led to less positive or negative effects, these are minor and are mostly attributed to the status of sites. Therefore, no further mitigation or enhancement is considered appropriate.

## 7. Next steps

### Plan Finalisation

- 7.1 This section explains the next steps in the plan-making/SA process.
- 7.2 Following consultation, the Inspectors will consider all representations received, before deciding how to report on the Plan's soundness.
- 7.3 Assuming that the Inspectors are ultimately able to find the Plan 'sound', it will then be adopted by St Helens Council. As soon as reasonably practicable after adoption of the Local Plan, an 'SA Statement' will be published that explains the process of plan-making/SA in full, including the measures to be taken to monitor the significant environmental effects of implementation of the Plan.

## Monitoring

- 7.4 The SA Report [Exam ref: SD005] submitted alongside the Local Plan presented a range of 'measures envisaged concerning monitoring' in Table 10.1. The work carried out in relation to the proposed modifications does not necessitate any significant amendments to the proposed measures at this stage (given that no additional significant effects have been identified).

## Appendix A: Screening the Main Modifications to the Proposed Local Plan Submission Draft

The draft main modifications below are expressed either in the form of ~~strikethrough~~ for deletions and **underlined and bold** for additions of text, or by specifying the modification in words.

When reviewing the Main Modifications below, please note that the original Local Plan Submission Draft (2019) policy numbers have been retained for ease of use. These will be updated after the Main Modifications consultation has been undertaken, along with all necessary policy number references throughout the document, in the final version of the Local Plan, to reflect the omission and addition of policies as a result of Main Modifications.

The Main Modifications are set out below and include 12 separate Annexes. The Policies Map is not a development plan document and so the Inspectors do not have the power to recommend main modifications to it. However, a number of the published Main Modifications to the Plan's policies require further corresponding changes to be made to the Policies Map. In addition, there are some instances where the geographic illustration of policies on the submission Policies Map is not justified and changes to the Policies Map are needed to ensure that the relevant policies are effective. Therefore, whilst changes to the Policies Map in Annex 7 do not comprise Main Modifications, they are attached to this schedule for completeness.

<b>Mod Ref No.</b>	<b>Page number</b>	<b>Current policy/ paragraph</b>	<b>Change</b> (deleted text in <del>strikethrough</del> ; new text <b><u>underlined</u></b> and bold; changes to diagrams, tables, etc. described in italic text).	<b>Reason for Modification</b>	<b>SA Screening</b>
MM001	0	<b>Front Cover and references to 2035 throughout Plan</b>	St Helens Borough Local Plan 2020-203 <del>5</del> <i>Change all references to 2035 throughout the Plan to 2037 to reflect the extended Plan period, and update any associated requirement figures and supply information (including for employment and housing), where necessary.</i>	To reflect extended Plan period to 2037 to ensure a 15 year time horizon on adoption of the Plan, in accordance with the National Planning Policy Framework (NPPF).	The employment and housing requirements have been updated to reflect the additional two years of Plan

					period, but this does not result in any changes to the proposed site allocations. No implications for SA findings.
MM00 2	4	<b>Introduction</b> Paragraph 1.9.1	“1.9.1 In accordance with national planning legislation, the Local Plan will be subject to regular monitoring and will be reviewed <b>at least once every</b> <del>no more than</del> 5 years after its date of adoption <b><u>to assess whether it needs updating, and action taken to update the Plan if considered necessary.</u></b> This will ensure that planning policies in St Helens Borough remain responsive to the development needs of the Borough.”	Correction to accord with national planning policy.	No implications for SA findings.
MM00 3	10	<b>Context - Heritage Assets</b> Paragraph 2.9.2	2.9.2 Despite the urban character of much of the St.Helens Borough, over half of its area is rural or semi-rural in nature, and 7% of it constitutes open green spaces within the urban areas. The Borough benefits from an extensive network of open countryside and green spaces, much of which is accessible to local residents providing opportunities for formal and informal recreation, and improved health and quality of life. Certain spaces provide valuable nature conservation habitats, including, for example, 120 designated Local Wildlife Sites. Open spaces also play a role in helping to manage flood risk, including in the	Inclusion of reference to the Council’s Climate Change Emergency Declaration.	Reference for clarity. No implications for SA findings.

			Sankey Catchment that covers much of the Borough. <b><u>In addition, open spaces provide opportunities to mitigate and adapt to the impacts of climate change. Therefore, this plan will support the Council's Climate Change Emergency declaration.</u></b>		
MM00 4	15	<b>3.3 Ensuring delivery of the aims and objectives</b>	<p><i>Insert new paragraphs 3.3.2 and 3.3.3 as follows:</i></p> <p><b><u>3.3.2 The plan proposes to review the following Supplementary Planning Documents (SPDs) that are used by the Council:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Ensuring a Choice of Travel</u></b></li> <li>• <b><u>Hot Food Takeaway</u></b></li> <li>• <b><u>Affordable Housing</u></b></li> <li>• <b><u>New Residential Development</u></b></li> <li>• <b><u>Householder Development</u></b></li> <li>• <b><u>Telecommunications</u></b></li> <li>• <b><u>Nature Conservation</u></b></li> </ul> <p><b><u>3.3.3 This Plan also proposes to produce new Supplementary Planning Documents to support the implementation of policies:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Developer Contributions</u></b></li> <li>• <b><u>Open space provision and enhancement</u></b></li> <li>• <b><u>Houses in Multiple Occupation (HMOs)</u></b></li> </ul>	To provide clarity on the SPDs to be updated and prepared to support the implementation of this Plan.	Relate to procedural matters. No implications for SA findings.
MM00 5	16	<b>LPA01</b>	<i>Entire 'Policy LPA01: Presumption in Favour of Sustainable Development' to be deleted along with accompanying Reasoned Justification (and associated re-numbering of subsequent policies in the Plan)</i>	To avoid duplication with NPPF.	Effects of LPA01 were neutral given that it replicated the NPPF. Therefore, no implications for

					overall SA findings.
MM006	17	LPA02	<p>3. The re-use of <b>suitable</b> previously developed land in Key Settlements will remain a key priority. A substantial proportion of new housing throughout the Plan period will be on such sites. This will be encouraged <b><u>through the use of Policies LPA08 and LPC02 to support the delivery of sites, particularly those on Previously Developed Land, by, for example,</u></b> setting lower thresholds for developer contributions on previously developed sites to reflect the higher costs and lower sales values typically associated with redeveloping such sites, <b><u>where appropriate.</u></b></p>	To cross-reference the other policies in the Plan which provide the mechanisms for such.	Changes are factual and procedural rather than substantive. Therefore, no implications for overall SA findings.
	17		<p><i>Addition of new section 4 into policy:</i>  <b><u>4. Comprehensive regeneration of the wider Borough will be delivered by the English Cities Fund Regeneration Partnership, through the provision of quality housing, new commercial activity, upgraded infrastructure and the overall improvement of the social and economic viability of the Borough on a phased basis.</u></b></p>	A factual update following the Council entering into a strategic partnership with the English Cities Fund.	
	17-18		<p><i>Re-number existing criteria 4-10 to 5-11.</i></p>	For clarity.	

<p>17</p>	<p>4. <del>5.</del> This Plan releases land from the Green Belt to enable the needs for housing and employment development to be met in full over the Plan period <del>from 1 April 2020 until</del> <b>up to</b> 31 March 2037<del>5</del>, in the most sustainable locations. Other land is removed from the Green Belt and safeguarded to allow for longer term housing and / or employment needs to be met after 31 March 2037<del>5</del>. Such Safeguarded Land is not allocated for development in the Plan period and planning permission for permanent development should only be granted following <b>an update</b> <del>full review</del> of this Plan. Within the remaining areas of Green Belt (shown on the Policies Map) new development shall be regarded as inappropriate unless it falls within one of the exceptions set out in the National Planning Policy Framework (or any successor document). Inappropriate development in the Green Belt shall not be approved except in very special circumstances.</p> <p><b><u>Delivery of compensatory improvement measures within areas remaining in the Green Belt will be required following any release of Green Belt land for development purposes. Details of such improvements will be considered during the development management process and assessed on an individual application basis.</u></b></p> <p>“67. Parkside West and Parkside East form transformational employment opportunity sites that</p>	<p>All changes to provide clarity and ensure consistency with the NPPF.</p> <p>To reflect the inclusion of a bespoke Parkside West Policy</p>
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			will make a major contribution to the economic development of St. Helens Borough and beyond. Development that prejudices their development in accordance with Policies LPA04, <del>and</del> LPA10 <b><u>and LPA12</u></b> will not be allowed.”	(Policy LPA12).	
22	Reasoned Justification	<p>4.6.9 .... This will ensure that the changes to the Green Belt endure well beyond 2035, avoiding the need for another Green Belt review for a substantial period, and giving a clear indication of the potential location of future development and associated infrastructure needs.</p> <p><b><u>4.6.10 The Council’s SHLAA indicates that there is capacity for substantial housing development on urban sites. However it also established that Green Belt release would be required to help meet identified housing needs over the Plan period. Likewise, there is a significant shortfall in the urban supply of employment land against the identified needs.</u></b></p> <p><b><u>4.6.11 In view of the NPPF advice that local authorities work jointly with neighbouring authorities to meet any development requirements that cannot be met within their own boundaries, it should be noted that whilst St Helens shares a housing market area with Halton and Warrington, both have identified shortages of urban land supply for housing. St Helens Borough shares a functional economic market area with Halton, Knowsley, Liverpool, Sefton, West Lancashire and Wirral, none of which have identified spare capacity for employment development which could help meet the needs of St Helens. Such is the</u></b></p>	To clearly provide the strategic case for exceptional circumstances justifying the removal of land from the Green Belt in the Local Plan.	Justification text rather than policy, therefore no implications for SA findings.	

		<p><u>shortage of employment and housing development land in the surrounding areas as a whole that several authorities (Knowsley, Sefton and West Lancashire Councils) have successfully undertaken local Green Belt Reviews to meet their own needs, with further authorities also undertaking them (collectively covering the whole of Greater Manchester, Halton, Warrington and Wirral). None of these reviews have identified surplus capacity to help meet development needs arising in St Helens.</u></p> <p><u>4.6.12 In addition, there are other reasons why it is not desirable for housing or employment development needs arising in St Helens to be met in other authorities. If a neighbouring authority were able to meet such needs, this would (due to the shortage of urban land supply identified in those areas) be through the release of Green Belt, ie. the prospective loss of Green Belt in St. Helens would simply be replaced by a similar loss of Green Belt elsewhere. This would also lead to a risk that residents would need to move out of the Borough, potentially resulting in the loss of economically active residents within local communities. Such an approach would also be unlikely to guarantee delivery of affordable or special housing needs for residents of St Helens. If demand for new employment was required to be met outside the Borough, it would tend to exacerbate net out-commuting. This would prejudice the achievement of sustainable patterns of travel and make it more difficult for residents of St Helens, some of whom are likely to be reliant on public transport to access employment.</u></p>		
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			<p><b><u>4.6.13</u></b> For all of these reasons, there are considered to be exceptional circumstances at the strategic level to justify the release of Green Belt land to meet identified development needs.  <i>Renumber subsequent paragraph to account for the new paragraphs</i></p> <p><del>4.6.10</del><b><u>4.6.14</u></b> The sites that have been removed from the Green Belt ....</p>		
	23	Reasoned Justification Paragraph 4.6.11	<p><del>4.6.14</del> <b><u>4.6.15</u></b> New employment development falling within use classes B1, B2 and B8 <b><u>and for light industrial, offices and research and development uses</u></b> will be primarily ....”</p>	Class B1 uses are now subsumed into the new Class E. Policy wording changed to reflect this and ensure policy effectiveness.	No implications for SA findings.
		Reasoned Justification New Paragraph after current 4.6.15 (to be renumbered to 4.6.19)	<p><del>4.6.15</del> <b><u>4.6.19</u></b> ... Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and</p>	For clarity in terms of consistency with the NPPF.	No implications for SA findings.

		<p>following on from modifications above)</p>	<p>any other harm, is clearly outweighed by other considerations.</p> <p><b><u>4.6.20 In addition, the Council aims to protect and enhance remaining areas of Green Belt by seeking the delivery of compensatory improvement measures. In accordance with paragraph 138 of the NPPF, delivery of compensatory improvement measures will be sought when sites are released from the Green Belt for development as part of this plan. Such measures should enhance the environmental quality and accessibility of the remaining Green Belt land, amongst other improvements. Further guidance is provided within the National Planning Practice Guidance (Green Belt Land).</u></b></p> <p><b><u>4.6.21 The delivery of compensatory improvements will be supported by a number of policies within this Plan. For example, policies LPA09, LPC05-10 and LPC12 all have an environmental focus, which will support the delivery of Green Belt compensatory measures. Additionally, development management focussed policies, including LPD01-03 and LPD09 will support this.</u></b></p> <p><b><u>4.6.22 Beyond the policy framework in this Plan to support the delivery of Green Belt</u></b></p>		
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		<p><b><u>compensatory measures, as well as other development plan documents, such as the Bold Forest Park AAP, the Council will continue to build on project improvements delivered to date. Improvements include those at the strategic level, such as at Bold Forest Park, for example the expansion of tree cover and the delivery of improved recreational facilities. A further strategic level project is the Sankey Valley Corridor Nature Improvement Area (NIA), which is focussed on enhancing the aquatic environment as well as the surrounding natural environment within the catchment, and improvements in environmental management practices. Improvements in this location have included accessibility enhancements, including walking and cycling infrastructure and new signage, enabling increased access to the Green Belt for residents and visitors. It is expected that further improvements can be delivered at these two strategic projects as part of Green Belt compensatory measures.</u></b></p> <p><b><u>4.6.23 There are further sites around the Borough that could be improved as part of Green Belt compensatory measures including those which form part of the Knowsley and St Helens Mosslands Nature Improvement Area (NIA), comprising three sites in the north of</u></b></p>		
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			<p><u>the Borough, near Rainford, one by Parr and one by Newton-le-Willows (see Appendix 9). In addition, there are many Local Wildlife Sites (LWS) in the Borough, which are identified on the Policies Map, and Appendix 8 of this Plan shows that there are several LWS in each ward of the Borough, with many of these wards having LWS in the Green Belt. There are also three Local Nature Reserves located within the Green Belt. Compensatory measures can also occur at non-designated sites within the Green Belt, for example, initiatives related to alleviating the effects of flooding events, such as those implemented previously in the settlement of King’s Moss. Therefore, there are clear opportunities for localised Green Belt compensatory measures to be delivered on such designated and non-designated sites across the entire Borough through the delivery of environmental improvements, in addition to the two identified strategic sites referred to above.”</u></p>		
24	Paragraph 4.6.17 (to be renumbered 4.6.25)	Paragraph 4.6.17 (to be renumbered 4.6.25)	<p>“4.6.17<b>4.6.25</b> ... Open spaces and landscaping, including those provided within development sites also provide opportunities to adapt to climate change by storing flood water, reducing urban heat islands, capturing carbon and improving air quality, <b>and therefore support the Council’s Climate Change Emergency declaration.</b></p>	For clarity, and to show link to the Council’s Climate Change Emergency Declaration.	No implications for SA findings.

	24	Paragraph 4.6.18 (to be renumbered 4.6.26)	<p>Whilst public funding support to create and manage open spaces ...”</p> <p>“4.6.18 <b>4.6.26</b> ... Enhancing linkages between areas of deprivation and employment areas particularly by public transport, walking and cycling is a key priority. <b><u>Such enhancement of sustainable transport modes further supports the Council’s Climate Change Emergency declaration through the promotion of active and low carbon travel opportunities.</u></b> Further details of the Plan’s approach ...”</p>	For clarity, and to show link to the Council’s Climate Change Emergency Declaration.	
24	24	Paragraph 4.6.19	<p>“4.6.19 <b>4.6.27</b> As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area. <del>It is also pursuing opportunities to enhance town centres in the Borough, for example through the creation of the St.Helens Town Centre Strategy. In addition, the Council intends to work pro-actively with partner organisations where necessary to secure the suitable regeneration of other town, district and local centres and of existing housing and employment areas, particularly in less affluent areas. The Council will prepare Supplementary Planning Documents covering specific areas where this is considered necessary to help implement their regeneration.</del>”</p>	For clarity following the other modifications proposed in relation to regeneration (as below).	

<p>24</p>	<p>Reasoned Justification</p>	<p><i>Insert new paragraphs 4.6.28 to 4.6.30 as follows:</i>  <b><u>“4.6.28 The Council is entering into a formal partnership agreement with the English Cities Fund as the Council’s preferred strategic partner to ensure the delivery of a Borough wide regeneration strategy, including economic regeneration and housing. The Council has recognised that a new approach to growing the economy of the Borough is required that seeks to work pro-actively with the private sector and establish a strategic partnership maximising the opportunities presented to deliver significant future growth in St. Helens and deliver key priorities including Town Centre regeneration, social wellbeing and providing appropriate infrastructure to support future development. 4.6.29 Furthermore, as part of the ‘Town Deal’ initiative established by the Government in 2019, the Council has successfully secured significant investment of up to £25 million. This funding will be used to help increase economic growth with a focus on land use and regeneration, improved connectivity (both transport and better broadband connectivity), skills and employment, and heritage, arts and culture for St. Helens Town Centre. 4.6.30 The Council will prepare Supplementary Planning Documents covering specific areas to help implement regeneration where this is considered necessary.”</u></b></p>	<p>To provide a factual update. The regeneration of the town and district centres are a key priority of the Local Plan. Therefore, reference to both the ECF and Town Deal is considered appropriate.</p>	
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MM007	29	LPA04 Section 1	c) ensure the necessary infrastructure is provided to support business needs (see <b>Policy</b> LPA-08); and d) support the creation of and expansion of small businesses-; <b>and</b> <b><u>e) support businesses and organisations in the economic recovery and renewal from the COVID-19 pandemic.</u></b>	To reference the COVID19 pandemic, as the Local Plan will support local businesses in a post COVID19 economy.	Likely to strengthen the impacts of the policy in terms of benefits for the economy as well as health and wellbeing. Unlikely to be significant effects though.
	29	Section 2	"2. The Council will aim to deliver a minimum of 215.4 <b>173.24</b> hectares of land for employment development between 1 April 20 <b>21</b> 48 and 31 March 203 <b>7</b> 5 to meet the needs of St Helens Borough."	To reflect the extension of the Plan period by two years from 2035 to 2037 and the changed status of sites from allocation to completed. This updated figure aligns with the updated Local Plan Submission Draft Table 4.4 in Annex 5 of this document.	As per MM001 above, this change simply reflects the additional two years of Plan period, and the updated employment supply position also. It does not change any of the proposed site allocations, or the basis of the employment requirement. No implications for SA findings.
	29	Section 5 a)	"a) the land or building (or any part of it) is no longer suitable and economically viable for <b>light industrial, offices and research and development</b> <del>B4, B2 or B8 uses</del> in accordance with the ..."	To provide clarity and ensure effectiveness of Policy as Class B1 uses are now subsumed into the new Class E.	No implications for SA findings.

	30	Section 6	<p>“Proposals for the re-use, re-configuration or re-development for <b><u>B4 light industrial, offices and research and development</u></b>, B2 or B8 uses of land or buildings used for <b><u>B4 light industrial, offices and research and development</u></b>, B2 or B8 uses (including where ...”</p>	To provide clarity and ensure effectiveness of Policy as Class B1 uses are now subsumed into the new Class E.	No implications for SA findings.
		New section 7 of policy	<p><b><u>7. Proposals for Class E uses in locations outside a defined centre will be subject to a condition to prohibit town centre uses (as defined in the glossary of the NPPF), unless the requirements of Policy LPC04 are satisfied.</u></b>  <del>78.</del> The Council will support proposals to... “  <i>Subsequent criteria will be renumbered accordingly.</i></p>	Required in response to the introduction of Use Class E, and to ensure the Plan can guide uses to the most appropriate locations.	No implications for SA findings.
	31	Table 4.1	<p><i>Remove sites 2EA, 3EA, 10EA and 11EA Table 4.1 to be updated. See Annex 9.</i></p>	Sites already developed/under construction. No longer need to allocate them.	Effects associated with these sites should be considered part of the baseline position rather than attributed to the Plan <b>Screen in</b>

31	Table 4.1 'Appropriate Use(s)' column For allocation 9EA	For this site, appropriate uses will read: " <b><u>light industrial, offices and research and development</u></b> , B2, B8"	For clarity, as Class B1 uses are now subsumed into the new Class E.	No implications for SA findings.
31	Footnote 15	<del>"15 Sites 2EA and 6EA are subject to existing planning permissions for employment development."</del>	To reflect the removal of site 2EA as an allocation and for improved clarity.	The removal of site 2EA and others as a result of their completed / under construction status is screened in above. As this specific change is a consequential one for clarity, it has no further implications for the SA findings.
31	Footnote 16	"16 The phrases B4, B2 and B8 in Policy LPA04 refer to use classes in the Town and Country Planning (Use Classes) Order 1987 (as amended)."	To reflect the updated terminology in the policy and reasoned justification.	No implications for SA findings.
32	New Paragraphs 4.12.2 and 4.12.3 in the Reasoned Justification	<b><u>4.12.2 The Local Plan's vision, still stands true as we plan for recovery from the COVID-19 pandemic: By 2037, St Helens Borough will provide through the balanced regeneration and sustainable growth of its built-up areas, a range of attractive, healthy, safe, inclusive and accessible places in which to live, work, visit and invest. Key to this is a continued focus on the economy, so that St. Helens residents are able to access good quality jobs that raise their living standards, whilst also improving physical and mental health.</u></b>	To provide a factual update regarding the Council's strategic partnership with the English Cities Fund in a post COVID19 economy.	No implications for SA findings.

			<p><b><u>4.12.3 It is anticipated that the English Cities Fund Regeneration Partnership and the Council’s successful Town Deal funding bid will also assist in the post COVID-19 economic recovery.</u></b></p> <p>“4.12.24 The provision of new well-located ...”</p> <p><i>Subsequent re-numbering of Reasoned Justification paragraphs required.</i></p>	To provide clarity as Class B1 uses are now subsumed into the new Class E.	
32	Reasoned Justification Paragraph 4.12.2 (to be renumbered 4.12.4)	“4.12.42 .... development needs within the B4 (business) <b><u>light industrial, offices and research and development uses</u></b> , B2 (general industrial) and B8 (storage and distribution) use classes during the Plan period ...”	To provide clarity as Class B1 uses are now subsumed into the new Class E	No implications for SA findings	
33	Table 4.2 ‘Employment Type’ Column	“B1 (a) Office” “B1 (b) Research and <del>e</del> Development”  “B1 (c) Light Industry”	For clarity, as Class B1 uses are now subsumed into the new Class E.	No implications for SA findings.	
33	Reasoned Justification Paragraph 4.12.7 (to be renumbered 4.12.9)	“4.12.97 Based on the <del>GAN</del> identified in the ELNS Addendum Report up to 2037, the OAN requirement for 2012-2037 <del>5</del> has been calculated as a minimum of 227.4 <del>239</del> ha as shown in Table 4.3. This figure has been calculated by projecting forward the historic 5.8ha per annum growth scenario for the 1997-2012 period (referred to in the ELNS Addendum Report) from the base date of 2012 to the end date of the Plan (2037 <del>5</del> ), and then adding a 5 year buffer to the baseline OAN (to ensure adequate choice and flexibility) and the	To reflect the extension of the Plan period by two years from 2035 to 2037.	As above, this change simply reflects the additional two years of Plan period. It does not result in change to any of the proposed site allocations, or the basis of the	

			recommended allowance for SuperPort and Parkside SRFI of 65ha from the ELNS Addendum Report.”		employment requirement. No implications for SA findings.										
	33	Table 4.3	<p><i>Update Table 4.3 in the Plan as follows:</i></p> <p><b>Table 4.3 Objectively Assessed Need for new employment land 2012-2037<del>5</del></b></p> <table border="1"> <thead> <tr> <th>Local Plan Objectively Assessed Needs Requirement 2012-2037<del>5</del></th> <th>Hectares</th> </tr> </thead> <tbody> <tr> <td>Baseline OAN 2012 to 2037<del>5</del> (based on ELNS Period 1997-2012, 5.8ha per annum growth scenario)</td> <td>133.4 <del>145</del></td> </tr> <tr> <td>5 year Flexibility Buffer</td> <td>29</td> </tr> <tr> <td>Allowance for SuperPort and Parkside SRFI</td> <td>65</td> </tr> <tr> <td><b>Total</b></td> <td><b><del>227.4</del> 239</b></td> </tr> </tbody> </table>	Local Plan Objectively Assessed Needs Requirement 2012-2037 <del>5</del>	Hectares	Baseline OAN 2012 to 2037 <del>5</del> (based on ELNS Period 1997-2012, 5.8ha per annum growth scenario)	133.4 <del>145</del>	5 year Flexibility Buffer	29	Allowance for SuperPort and Parkside SRFI	65	<b>Total</b>	<b><del>227.4</del> 239</b>	To reflect the extension of the Plan period by two years from 2035 to 2037.	As above, this change simply reflects the additional two years of Plan period. It does not result in change to any of the proposed site allocations, or the basis of the employment requirement. No implications for SA findings.
Local Plan Objectively Assessed Needs Requirement 2012-2037 <del>5</del>	Hectares														
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5 year Flexibility Buffer	29														
Allowance for SuperPort and Parkside SRFI	65														
<b>Total</b>	<b><del>227.4</del> 239</b>														
	33	Reasoned Justification Paragraph 4.12.8 (to be renumbered 4.12.10)	“... allowing for take-up of employment land since 2012 against the OAN ( <del>227.4</del> <b>239</b> ha) and the existing supply of developable employment land in the Borough as shown in Table 4.4. Once an allowance of <del>2.7</del> <b>60.77</b> ha for take up and <del>9.34</del> <b>4.99</b> ha for the existing developable employment land supply in the Borough has been applied the residual requirement is <del>215.4</del> <b>173.24</b> ha.”	To reflect the extension of the Plan period by two years from 2035 to 2037, and the updated employment supply data provided in Table 4.4 provided in Annex 5 of this document.	As above, this change simply reflects the additional two years of Plan period. It also provides a factual update on the employment supply due to the										

					passage of time. It does not change any of the proposed site allocations, or the basis of the employment requirement. No implications for SA findings.
	34	Table 4.4	<i>Replace Table 4.4 in the LPSD with an updated version to show the latest position, as provided in Annex 5. Add a row to end of the table to show the supply from the remaining site allocations.</i>	To show the updated residual employment land requirement (as at 31 March 2021), and to reflect the extended Plan period to 2037.	
	34	Reasoned Justification Paragraph 4.12.9 (to be renumbered 4.12.11)	<del>4.12.11</del> The above residual requirement figure includes no allowance for replacing employment land lost to other uses between 2012 and 2037. This ...”	To reflect the extension of the Plan period by two years from 2035 to 2037.	A reflection of the additional two years of Plan period. No implications for SA findings.
	34	Reasoned Justification Paragraph 4.12.11	<del>4.12.11</del> ... The draft SHELMA also assesses the need for <b>B1 light industrial, offices and research and development</b> , B2 and for smaller scale B8 development (of less than 9,000m <sup>2</sup> ). Unlike those ...”	For clarity, as Class B1 uses are now subsumed into the new Class E.	No implications for SA findings.

34	Reasoned Justification Para 4.12.12	“4.12.14 ... Whilst the residual employment land needs in the Borough identified in Table 4.4 (totalling <del>215.4</del> <b>173.24</b> ha) cover a different time period to the SHELMA they will be sufficient to both meet the Borough’s needs for <del>B4</del> <b>light industrial, offices and research and development</b> , B2 and small scale B8 uses and a substantial ...”	To reflect the extension of the Plan period by two years from 2035 to 2037 and the changed status of sites from allocation to completed. This updated figure aligns with the updated Local Plan Submission Draft Table 4.4 in Annex 5 of this document.  Class B1 uses are now subsumed into the new Class E.	No implications for SA findings.
35	Reasoned Justification Paragraph 4.12.14 (to be renumbered 4.12.16)	“4.12.16 The total supply of allocated employment sites will (at <del>234.08</del> <b>182.31</b> ha – excluding site 1EA) slightly exceed the residual employment land requirement identified in Table 4.4. ...”	To reflect the extension of the Plan period by two years from 2035 to 2037 and the changed status of sites from allocation to completed. This updated figure aligns with the updated Local Plan Submission Draft Table 4.4 in Annex 5 of this document.	As per MM001 above, this change simply reflects the additional two years of Plan period, and the updated employment supply position also. It does not change any of the proposed site allocations, or the basis of the employment requirement. No implications for SA findings.
35	Reasoned Justification – new paragraph after 4.12.13 (to be renumbered 4.12.15)	<b><u>4.12.16 To ensure the development of the proposed employment allocations for the identified employment uses, the Council will</u></b>	The inclusion of a specified marketing period makes Policy LPA04 more effective, but it also clarifies that this not only	No implications for SA findings.

			<p><b><u>require any applications for alternative uses to demonstrate that the site has been marketed for employment use on the open market for a minimum period of 18 months. Only after this period, and subject to no interest being received for the identified employment uses, will an application for an alternative use be considered further. This applies to site allocations within the Plan, as well as those sites contributing to meeting identified employment needs over the Plan Period, including but not limited to land at Florida Farm North, Land north of Penny Lane, Land at Lea Green Farm West and Gerards Park, College Street.</u></b></p> <p><i>Subsequent paragraphs to be re-numbered accordingly.</i></p>	<p>applies to allocations within the Plan, but also other sites that are contributing to meeting the identified needs over the Plan period (including those which are proposed to no longer benefit from allocation status because they are now complete or under construction).</p>	
			<p>4.12.17<del>20</del> Alternative uses may also be appropriate where there is no current or likely future market demand for employment uses on the site and / or its reuse for such purposes would not be viable currently or in the long term. The Local Economy Supplementary Planning Document (2013) outlines the evidence applicants will be required to provide in relation to the marketing and viability of employment sites before their loss for other uses can be supported. <b><u>This outlines the requirement for existing employment sites to carry out a minimum of 12 months marketing for employment uses in order to identify that the site is not viable in the long-term.</u></b></p>	<p>To provide clarity on the marketing period required for proposals for alternative uses on existing employment sites.</p>	<p>No implications for SA findings.</p>

		<p>Reasoned Justification, new paragraph after the end of existing para 4.12.18 (to be renumbered 4.12.21</p>	<p><i>Following on from end of the Reasoned Justification para 4.12.18 (to be renumbered 4.12.21), add the following text as a continuation ....</i>  <b><u>“Green Belt Exceptional circumstances 4.12.22 The following paragraphs articulate the exceptional circumstances justifying the removal of land from the Green Belt on a site by site basis. This builds on the exceptional circumstances strategic case as set out in the Reasoned Justification to Policy LPA02, and the following should be read in that context. 1EA – Omega South Western Extension, Land north of Finches Plantation, Bold 4.12.23 The Green Belt Review (2018) found the sub-parcel reflecting this site to make a ‘medium’ contribution to the Green Belt purposes as whilst the site contains no inappropriate development and has open views across it, it is bordered by large scale built development at Omega South and the M62, and therefore only has a moderate countryside character. The Review also found the site to have ‘medium’ development potential. 4.12.24 The site is adjacent to the Borough’s boundary with Warrington Borough, and its development would form a natural extension of the adjacent Omega employment site. This is particularly important in relation to the exceptional circumstances in the context of this site being allocated to help meet Warrington’s employment needs.</u>”</b></p>	<p>To provide the site specific exceptional circumstances for the proposed employment allocations justifying their release from the Green Belt.</p>	<p>No implications for SA findings.</p>

		<p><b><u>4.12.25 The site is within 1km of an area within the 20% most deprived population in the UK, so its development for employment uses would help to reduce poverty and social exclusion. Further, the development of this site, provides the opportunity to improve sustainable transport links between St Helens and this site, as well as the wider Omega employment site, improving access to jobs in this location for residents of St Helens.</u></b></p> <p><b><u>4EA – Land south of Penny Lane, Haydock</u></b></p> <p><b><u>4.12.26 This site forms a relatively small part of a larger parcel of land that the Green Belt Review (2018) found to make a ‘medium’ contribution to the purposes of the Green Belt, with ‘good’ development potential. It should be noted that the parcel of land assessed in the Green Belt Review included the land to both the north and south of Penny Lane. In this context, a significant part of the assessed Green Belt parcel (11.05ha) has an extant planning permission for employment development, of which the majority has now been developed. This is the land to the north of Penny Lane. The site forms a natural extension to the Haydock Industrial Estate. Indeed, given the development of land to the north of Penny Lane, this site is now surrounded by built development of the Haydock Industrial Estate to the north, east and south, and the M6 to the west. The site is also located in close proximity to an area that falls within the 20% most deprived population in the UK. Therefore, its development for employment use would help to reduce poverty and social exclusion. The development would also reduce</u></b></p>		
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		<p><b><u>the need to travel by making best use of existing transport infrastructure due to its location close to a high frequency bus service.</u></b></p> <p><b><u>5EA – Land to the West of Haydock Industrial Estate, Haydock</u></b></p> <p><b><u>4.12.27 The Green Belt Review (2018) found the sub-parcel of land reflecting this site to make a ‘medium’ contribution to the Green Belt purposes. The site adjoins the large built up area of Haydock, but is relatively well contained and strategic gaps between Haydock and elsewhere could still be maintained following the release of this site from the Green Belt. The Review also found the site to have ‘good’ development potential. The removal of this site from the Green Belt in conjunction with site 6EA, and the now developed employment land at Florida Farm North presents the opportunity to provide a stronger, more robust boundary in this location. The site is located within 1km of an area falling within the 20% most deprived population in the UK. Its development for employment use would help reduce poverty and social exclusion and help reduce the need to travel through making best use of existing transport infrastructure due to its location close to a high frequency bus service.</u></b></p> <p><b><u>6EA – Land West of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock</u></b></p> <p><b><u>4.12.28 The Green Belt Review (2018) found the sub-parcel of land reflecting this site to make a ‘medium’ contribution to the Green Belt purposes. At the time the Green Belt Review was undertaken, this site did not adjoin a large</u></b></p>		
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		<p><b><u>built-up area, but was considered in part to prevent ribbon development along Liverpool Road. Since that time, employment development at Florida Farm North has taken place adjacent the southern boundary of the site. This site would form a natural extension to the Haydock Industrial Estate, and its development would provide a stronger, more robust Green Belt boundary. The site is located within 1km of an area falling within the 20% most deprived population in the UK. Its development for employment use would help reduce poverty and social exclusion</u></b></p> <p><b><u>7EA – Parkside East, Newton-le-Willows</u></b></p> <p><b><u>4.12.29 The Green Belt Review (2018) found this site to make a ‘high+’ contribution to the Green Belt purposes due to its significant size, lack of enclosure to the east and strong countryside character with little inappropriate development. On this basis, the site would not ordinarily have progressed to further assessment. However, the Review acknowledged that the site forms part of the wider Parkside site, straddling the M6, for which there has been a long history of developer interest, including a planning application for a Strategic Rail Freight Interchange (SRFI), the area being highlighted as a potential location for an inter-modal freight terminal in the previous North West RSS and the Core Strategy (2012) identifying the site as a strategic locations for a SRFI. Furthermore, the evidence in the Parkside Logistics and Rail Freight Interchange Study (August 2016) found the site to be of regional and national significance in relation to regional and national policy, market demand and the</u></b></p>		
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		<p><b><u>need to deliver new and improved SRFIs, with the site’s opportunity for rail access to be second to none in the North West.</u></b></p> <p><b><u>4.12.30 This site has excellent locational advantages in relation to the delivery of an SRFI, including accessibility by rail with north-south and east-west routes immediately adjacent, as well as proximity to the M6, Junction 22. The evidence also indicates that the site is of a sufficiently large scale and layout to provide the necessary operational requirements of a SRFI. The development of a SRFI on this site would support the Government’s policy to move freight from road to rail.</u></b></p> <p><b><u>4.12.31 Therefore, whilst development of this site could have a high impact on the Green Belt, there are exceptional circumstances justifying its release from the Green Belt for development as a SRFI and the site is considered to have ‘good’ development potential.</u></b></p> <p><b><u>8EA – Parkside West, Newton-le-Willows</u></b></p> <p><b><u>4.12.32 The Green Belt Review (2018) found the parcel of land reflecting this site boundary to make a ‘medium’ overall contribution to the Green Belt purposes, influenced by the relatively high degree of enclosure, brownfield status of part of the site (former colliery and associated uses) and because it does not have a strong sense of openness or countryside character. It also found the site to have ‘good’ development potential. It’s scale and location, particularly in relation to the transport network, makes it ideal for employment uses to meet the identified employment needs. It will also support the delivery of the SRFI on Parkside East (site 7EA).</u></b></p>		
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			<p><b><u>4.12.33 The site is located within 1km of an area within the 20% most deprived population in the UK, so not only will development of the site bring wider economic benefits, it will also help to reduce poverty and social exclusion, and due to its public transport links, would help to reduce the need to travel by car.</u></b></p> <p><b><u>4.12.34 The relevance of paragraph 138 of the NPPF should also be noted given the importance of giving “first consideration to land which has been previously developed and / or is well-served by public transport” when a conclusion has been reached that it is necessary to release Green Belt land for development. The exceptional circumstances for removing land from the Green Belt to meet identified development needs is set out in the Reasoned Justification to Policy LPA02, and given the brownfield nature of much of this site, and for the other reasons set out, there are exceptional circumstances justifying the removal of this site from the Green Belt.”</u></b></p>		
MM008	37	LPA04.1 Section 1	<ul style="list-style-type: none"> <li>• 1EA: Omega South Western, Land north of Finches Plantation, Bold;</li> <li>• 2EA: Land at Florida Florida Farm North, Slag Lane, Haydock</li> <li>• 6EA: Land west of ...</li> </ul>	Site is proposed to be removed as an allocation as it is now complete and operational.	Effects should not be associated with the Plan Screen in
	38	Section 5	<p>“5. The masterplans for each Strategic Employment Site, and any planning application for development within any other allocated employment site, must</p>	To reflect the inclusion of the new Parkside West Policy (LPA12) and removal of site 2EA as an allocation.	

			address the site specific requirements set out in Appendix 5 (in the case of sites 1EA, <del>and 6EA, and 2EA and 8EA</del> ) and Policies <del>LPA10</del> <b>and LPA12</b> (in the case of sites <del>7EA and 8EA</del> )." <del>iesy</del>		
MM009	40	<b>LPA05</b> Section 1	"1. In the period from 1 April 2016 to 31 March 2037 a minimum of <del>9,234</del> <b>10,206</b> net additional dwellings should be provided in the Borough of St. Helens, at an average of at least 486 dwellings per annum."	To reflect the extension of the Plan period by two years from 2035 to 2037 and the additional two years of housing requirement this change results in. This updated figure aligns with the update of Table 4.5 of the Local Plan Submission Draft as set out in Annex 3 of this document.	As per MM001 above, this change simply reflects the additional two years of Plan period. It does not change any of the proposed site allocations, or the basis of the housing requirement. No implications for SA findings.
	40	Section 3	"a) at least 40 dwellings per hectare (dph) on sites that are within or adjacent to St.Helens or Earlestown Town Centres; <b>and</b> b) at least 30 dph on <b><u>all sites outside St. Helens and Earlestown town centres.</u></b> <del>that are within or adjacent to a district or local centre or in other locations that are well served by frequent bus or train services; and</del> c) at least 30 dph on <del>other sites that are within an existing urban area.</del> Densities of less than 30 dph will only be appropriate where they are necessary to achieve a clear planning objective, <del>such as avoiding harm</del>	To improve clarity of policy.	No implications for SA findings.

			to the character or appearance of the area.”		
		Section 4b)	b) .... If annual monitoring demonstrates the deliverable housing land supply falls significantly below the required level, <b>taking into account the requirements in relation to housing delivery set out in national policy</b> , a partial or full plan review <b>update</b> will be considered to bring forward additional sites.	To provide clarity.	No implications for SA findings.
41	Table 4.5	<i>Updated version of Table 4.5 provided in Annex 8 to replace Table 4.5 in the LPSD, to remove site 3HA as an allocation and update other sites to reflect the latest housing trajectory</i>	Sites which are completed or where construction is well underway do not require allocation status. Also, Table 4.5 needs updating to reflect the latest housing trajectory as a result of the evidence presented through the Examination process to date.	Effects associated with this site should be considered part of the baseline position rather than attributed to the Plan <b>Screen in</b>	
41	Footnote 24	24 The NDA (net developable area) for each site is an estimate of the area available to accommodate new housing once an allowance, typically <del>72</del> <b>75</b> %, has been made for features that are not included when calculating density e.g., areas performing a function for the wider area and not just the development-, such as significant new landscaping buffers, potential new schools, areas of strategic open space and roads to serve the wider area. <b>Therefore, most sites will have a NDA of 75%.</b>	To improve clarity.	No implications for SA findings.	

42	Reasoned Justification Paragraph 4.18.1	"4.18.1 ... The requirement of <del>9,234</del> <b>10,206</b> dwellings per annum set out in Policy LPA05 is designed to meet the full Objectively Assessed ..."	To reflect the extension of the Plan period by two years from 2035 to 2037 and the additional two years of housing requirement this changes results in.	To reflect the additional two years of Plan period as the Policy wording has been updated to show (as above). It does not change any of the proposed site allocations, or the basis of the housing requirement. No implications for SA findings.
42	Reasoned Justification Paragraph 4.18.5	"4.18.4 ... Application of the national standard method using this approach would generate a housing need of <del>468</del> <b>424</b> new dwellings per annum <sup>27</sup> ."	Factual update following the passage of time since the Local Plan Submission Draft was prepared.	No implications for SA findings.
42	Footnote 27	"27 This figure is derived by applying the standard method to the average household growth indicated in the 2014 based household projections for the 10 years from <del>2011</del> to <del>2031</del> and the latest 2020 affordability ratios data published in 2018, with the output extrapolated over the Plan period."	Factual update following the passage of time since the Local Plan Submission Draft was prepared, and reflects the updated position presented at the Examination.	No implications for SA findings.
43	Reasoned Justification Paragraph 4.18.10	"4.18.10 ... The St. Helens Strategic Housing Land Availability Assessment (SHLAA) 2017 ( <b>as updated with the latest information as at 1 April 2021</b> ) identifies that sites in the urban area (as at 1 Apr 2017) had a total capacity of <del>7,817</del> <b>6,114</b> dwellings. This figure includes sites with planning permission, sites under construction, other sites identified as suitable for housing and an allowance of 93 units per annum from small windfall sites of less than	To reflect the extension of the plan period by two years and the updated SHLAA information and housing trajectory based on the evidence provided through the Examination process. And to reflect the removal of allocation status for site 3HA.	Factual update and does not result in any change to the proposed site allocations. No implications for SA findings.

			0.25ha (based upon past delivery rates). The largest SHLAA sites are allocated as sites 3HA, 9HA and 10HA in Policy LPA05.		
	44	Reasoned Justification Paragraph 4.18.12	"4.18.12 ... In total, the allocated brownfield sites (3HA, 6HA, 9HA and 10HA) have an estimated capacity of <del>2,029</del> <b>1,611</b> dwellings in the Plan period. The location of sites that have been released from the Green Belt has been determined by the St. Helens Green Belt Review. In total, the former Green Belt sites (1HA, 2HA, 4HA, 5HA, 7HA and 8HA) have an estimated capacity of <del>2,056</del> <b>2,114</b> dwellings in the Plan period."	Factual update to reflect the updated housing trajectory (shown through the updated Table 4.5 in Annex 8 of this document) based on the evidence provided through the Examination process and the extended Plan period, and to reflect the removal of allocation status for site 3HA.	Factual update and does not result in any change to the proposed site allocations. No implications for SA findings.
	44	Reasoned Justification	"4.18.14 The density of development on each allocated site should be at or above the minimum figures given in Table 4.5. The stated capacities of each site listed in the table are indicative, <del>and do not represent either maximum or minimum figures</del> <b>reflecting the minimum densities and anticipated net developable areas set out.</b> The actual capacity will also be determined having regard to the acceptability of specific proposals in relation to relevant national and local policies."	For improved clarity.	No implications for SA findings.
	45	Table 4.6 Housing Land Supply	<i>Replace LPSD Table 4.6 with Tables 5.2 - 5.5 provided in Annex 3.</i>	To provide an updated position as at 31 March 2021 and to take account of the latest housing trajectory as a result of the evidence presented through the Examination process to date. To also improve the presentation of this key information in a simpler, easy to understand format.	No implications for SA findings.

45	Footnotes 29-33	<i>Remove Footnotes 29-33 in their entirety</i>	As these footnotes are not relevant in the context of Tables 5.2 – 5.5 in Annex 3 of this document which will replace Table 4.6 in the LPSD.	No implications for SA findings.
46	Reasoned Justification Paragraph 4.18.19	“4.18.19 ... It is assumed that <b>the majority of housing on</b> most sites allocated in Policy LPA05 will be developed <del>in their entirety</del> within the Plan period ...”	Factual update.	No implications for SA findings.
47	Table 4.7 and Figure 4.3	<i>Replace LPSD Table 4.7 and Figure 4.3 in the Plan with the table and trajectory provided in Annex 11.</i>	To bring the information up to date.	No implications for SA findings.
47	Reasoned Justification Paragraph 4.18.21	“4.18.21 ... the Council may undertake a Local Plan <b>update</b> review to bring forward additional sites such as those ...”	For clarity.	No implications for SA findings.
47	Reasoned justification	<p><i>Add the 5 year housing land supply tables in Annex 4 to the end of the Reasoned Justification of Policy LPA05 under a new sub-heading ‘Five year housing land supply’, along with the following text:</i></p> <p><b><u>“Five year housing land supply</u></b>  <b><u>4.18.22 The following tables provides the housing land supply position on adoption of the Plan, and sets out the key assumptions and parameters used to calculate it.”</u></b></p> <p><i>[then insert tables in Annex 4]”</i></p>	Included so that the LP clearly express the key assumptions and parameters relied on to calculate the five year housing land supply on adoption of the LP.	No implications for SA findings.

	47	Reasoned Justification	<p><i>Following on from the end of the Reasoned Justification new paragraph 4.18.22 on five year housing land supply, the following text is to be added</i></p> <p><b><u>Green Belt Exceptional circumstances</u></b></p> <p><b><u>4.18.23 The following paragraphs articulate the exceptional circumstances justifying the removal of land from the Green Belt on a site by site basis. This builds on the exceptional circumstances strategic case as set out in the Reasoned Justification to Policy LPA02, and the following should be read in that context.</u></b></p> <p><b><u>1HA – Land south of Billinge Road, East of Garswood Road and West of Smock Lane, Garswood</u></b></p> <p><b><u>4.18.24 The Green Belt Review (2018) found the parcel of land corresponding to this site to make a ‘low’ overall contribution to the Green Belt purposes. In summary, all sides of the site have strong boundaries, and it is therefore well contained. The strategic gap between Billinge and Garswood could also be maintained notwithstanding the release of this site from the Green Belt. It also found the site to have ‘good’ development potential. The site is in a sustainable location within walking distance of a local shop and public transport links, including the nearby railway station. Safe access to the site can be provided, and a suitable sustainable drainage scheme also. Indeed, development of this site could help solve flooding issues in the surrounding urban area. The Sustainability Appraisal (SA) found development of the site would result in a high number of positive effects.</u></b></p>	<p>To provide the site specific exceptional circumstances for the proposed housing allocations justifying their release from the Green Belt.</p>	<p>No implications for SA findings.</p>
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		<p><b><u>2HA – Land at Florida Farm (South of A580), Slag Lane, Blackbrook</u></b>  <b><u>4.18.25 The Green Belt Review (2018) found the parcel of land generally reflecting this site to make a ‘low’ overall contribution to the Green Belt purposes, with strong permanent boundaries and not having a sense of openness or countryside character. In summary, there is existing residential development on three sides of the site, and the East Lancashire Road (A580) on the fourth side. It also found the site to have ‘good’ development potential. The site is in a sustainable location with good levels of accessibility to key services and jobs (including at the Haydock Industrial Estate). The site presents no technical constraints that cannot be satisfactorily addressed. Indeed, the provision of flood mitigation measures for the site could have the beneficial effect of helping alleviate flooding in the wider area. The SA found development of the site would have a mixed impact on achieving SA objectives, with a high number of positive effects, including good access to public transport and employment opportunities.</u></b></p> <p><b><u>4HA – Land bounded by Reginald Road / Bold Road / Travers Entry / Gorsey Lane / Crawford Street, Bold (Bold Forest Garden Suburb)</u></b>  <b><u>4.18.26 The Green Belt Review (2018) found the parcels of land that form this site make a ‘low’ to ‘medium’ contribution to the purposes of the Green Belt, with ‘good’ development potential. The land on which the site is located forms a notable indent in the alignment of the southern edge of the built up area of St Helens. Whilst</u></b></p>		
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		<p><u>there are open views across the parcel, it has strong, robust physical boundaries including existing development to the north, east and west, and Gorse Lane to the south. The site has good levels of accessibility to jobs in nearby industrial areas, and to public transport services, including via St Helens Junction railway station.</u></p> <p><u>4.18.27 The site would be sufficiently large to include new social infrastructure (ie. a new primary school, local retail centre and potentially health facilities). It is a major strategic opportunity to provide a wide range of new housing in an area that is close to some of the more deprived parts of the Borough, and incorporate and deliver the framework and philosophies of the Bold Forest Park Area Action Plan. There are no technical constraints to development of this site that cannot be satisfactorily addressed. Due to its scale and location, development of this site would contribute strongly towards meeting the strategic aims and objectives of the Local Plan.</u></p> <p><u>5HA – Land South of Gartons Lane and former St. Theresa’s Social Club, Gartons Lane, Bold</u></p> <p><u>4.18.28 The Green Belt Review (2018) found the parcel of land generally corresponding to this site boundary to make a ‘low’ overall contribution to the purposes of the Green Belt, benefitting from a high degree of visual enclosure with strong, robust boundaries. The Review also found the site to have ‘good’ development potential. The site is in a sustainable location with good transport links, including safe, convenient access by foot to the</u></p>		
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		<p><b><u>nearest local centre, bus stops and a railway station. It would form a natural expansion of the surrounding settlement and help deliver a range of housing in a relatively deprived area. Development of the site also provides the opportunity to facilitate improvements in line with the Bold Forest Park Area Action Plan. The SA found development of the site would have a mixed impact on the achievement of SA objectives, with a high number of positive effects.</u></b></p> <p><b><u>7HA – Land West of the A49 Mill Lane and to the East of the West Coast Mainline railway line, Newton-le-Willows</u></b></p> <p><b><u>4.18.29 The Green Belt Review (2018) found the parcel of land containing this site to make a ‘low’ overall contribution to the purposes of the Green Belt, given its strong boundaries, high level of enclosure and the brownfield nature of much of the site. It does not have a strong sense of openness or countryside character. The Review also considered the site to have ‘good’ development potential. The site is in a sustainable location within a convenient walking distance of a local centre, various employment areas (existing and planned), a railway station and other public transport facilities. There are no technical constraints on the site that cannot be satisfactorily addressed. The SA concluded that development of the site would result in a high number of positive effects. This site is of particular significance given its brownfield nature, and the importance of making effective use of such land, where appropriate.</u></b></p>		
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			<p><b><u>8HA – Land South of Higher Lane and East of Rookery Lane, Rainford</u></b>  <b><u>4.18.30 The Green Belt Review (2018) found the sub-parcel of land reflecting this site boundary to make a ‘low’ overall contribution to the Green Belt purposes given its limited role in preventing sprawl and the merging of settlements. It also has strong boundaries and a high degree of visual containment. The Review found the site to have ‘good’ development potential. The site is sustainable, with good access to public transport, the local highway network and employment areas. There are no technical constraints that cannot be satisfactorily addressed. The SA found that development of the site will have a mixed impact on the achievement of SA objectives, with a high number of positive impacts. The location of the site also aligns with the Plan’s spatial strategy as Rainford is identified as a Key Settlement.</u></b></p>		
MM010	48	<b>LPA05.1</b>	<p>“1. The following sites allocated under Policy LPA0535 shall constitute Strategic Housing Sites:</p> <ul style="list-style-type: none"> <li>• 2HA: Land at Florida Farm (South of A580), Slag Lane, Blackbrook</li> <li>• <del>3HA: Former Penlake Industrial Estate, Reginald Road, Bold</del></li> <li>• 4HA: Land bounded by Reginald Road / Bold Road / Travers Entry / Gorse Lane / Crawford Street, Bold (Bold Forest Garden Suburb) ....”</li> </ul>	Sites that are under construction and well progressed in that respect do not require allocation status in the Plan.	Effects from this site no longer associated with the Plan.  Screen in.

	48	Footnote 35	"35 Within the list of Strategic Housing Sites, sites 3HA, 9HA, and 10HA are subject to ..."	Site 3HA is no longer proposed as an allocation as its construction is well underway.	No implications for SA findings
		Section 2f	"f) a Green Infrastructure Plan addressing biodiversity, geodiversity, greenways <b><u>(including any proposed new greenways as referred to in policy LPC07)</u></b> , ecological network, landscape character, trees, woodlands and water storage in a holistic and integrated way."	To make Policies LPC07 and LPA05.1 more effective in relation to the referenced new Greenways.	No implications for SA findings.
	49	Section 4	"The masterplans for each Strategic Housing Site, and any planning application for development within any other allocated housing site, must address the indicative requirements set out in Appendix 5 <b><u>(in the case of sites 2HA, 5HA, 6HA, 9HA and 10HA) and Policy LPA13 (in the case of site 4HA)</u></b> ."	To reflect the inclusion of the standalone, bespoke policy for site allocation 4HA.	No implications for SA findings.
MM011	50	<b>LPA06</b> Section 2	1. The sites identified as Safeguarded Land on the Policies Map have been removed from the Green Belt in order to meet longer term development needs well beyond <del>the</del> <b>this</b> Plan period. Such Safeguarded Land is not allocated for development in <del>the</del> <b>this</b> Plan period. The future uses that the sites are safeguarded for are listed in Tables 4.7 and 4.8. 2. Planning permission for the development of the safeguarded sites for the purposes identified in	For improved clarity.	No implications for SA findings.

			<p>Tables 4.7 and 4.8 will only be granted following a future Local Plan review <b>update (full or partial)</b> that proposes such development <b>based on the evidence showing a need for this</b>. Accordingly <b>Otherwise</b>, proposals for housing and employment development of safeguarded sites in the <b>this</b> Plan period will be refused.</p> <p>.....”</p>		
	51	<b>Table 4.8</b>	<p><i>Updated version of Table 4.8 provided in Annex 12 to replace Table 4.8 in the LPSD, to reflect the increased site area and indicative capacity of site 4HS following on from the site boundary change.</i></p>	For clarity.	No implications for SA findings.
	52	Reasoned Justification, paragraph 4.24.1	<p>“4.24.1 In accordance with Policy LPA02, the sites listed in Tables 4.7 and 4.8 have been safeguarded to meet potential long term development needs. Whilst they have been removed from the Green Belt, they are not allocated for development before 2035<u>7</u>. Their purpose is to ensure that the new Green Belt boundaries set by this Plan can endure well beyond 2035<u>7</u>. The reasons why specific sites are safeguarded rather than allocated for development before 2035<u>7</u> are set out in the St. Helens Green Belt Review 2018. The safeguarded sites are protected from other forms of development that would prevent or significantly hinder their future development for the uses identified in Tables 4.7 and 4.8. This is to ensure that, potentially, they could be used for these purposes in the future.</p> <p>4.24.2 The development of the safeguarded sites for the purposes in Tables 4.7 and 4.8 will only be acceptable if a future Local Plan <b>update, either full or partial</b>, confirms that such development is both</p>	For clarity and to reflect the extension of the Plan period up to 2037.	No implications for SA findings.

			<p>acceptable and required, <b><u>and proceeds to allocate such sites for development in that update. The Council may undertake and bring into effect such a Local Plan update within the current plan period of 2020-2037, should this be required and justified by the latest evidence.</u></b> This e-case for developing the sites is likely to be informed by the level of need for housing and / or employment development (whichever use is identified for the specific site) compared to site supply, infrastructure capacity <b><u>and needs</u></b> and any other factors that may affect the delivery of the sites at that time.</p> <p>.....</p> <p>4.24.4 The estimated combined capacity of the sites safeguarded for housing is 2,739,644 dwellings. To this can be added the indicative post-2037<del>5</del> delivery of 2,995,223 dwellings projected on the allocated housing sites 2HA, 4HA, 5HA, 6HA <b><u>and 10HA</u></b> (see Policy LPA05, Table 4.5) the delivery of which is expected to continue well beyond 2037<del>5</del>. Further contributions are likely to be made from windfall sites and other sources after 2037<del>5</del>. It should also be noted that household growth rates in St. Helens Borough are currently projected to reduce in the years up to, and after, 2037<del>5</del>, meaning that it is likely that post-2037<del>5</del>, housing needs may be lower than between 2020 and 2037<del>5</del>.</p> <p>....”</p>		
		<p>Reasoned Justification, New Paragraphs following 4.24.5</p>	<p><b><u>Green Belt Exceptional circumstances</u></b>  <b><u>4.24.6 The following paragraphs articulate the exceptional circumstances justifying the removal of land from the Green Belt on a site by site basis for safeguarding for development beyond the end of the plan period. This builds on the exceptional circumstances strategic case</u></b></p>	<p>To provide the site specific exceptional circumstances for the proposed safeguarded housing and employment sites, justifying their release from the Green Belt.</p>	<p>No implications for SA findings.</p>

		<p><b><u>as set out in the Reasoned Justification to Policy LPA02, and the following should be read in that context.</u></b></p> <p><b><u>Employment safeguarded sites</u></b></p> <p><b><u>1ES – Omega North Western Extension, Bold 4.24.7 The Green Belt Review (2018) found the sub-parcel of land reflecting this site boundary to make a ‘medium’ overall contribution to the Green Belt purposes as it contains no inappropriate development and has open views across the site, but it is bordered by large scale built development at Omega North and the M62 and therefore only has a moderate countryside character. It should be noted that this contrasts with the scoring of other Green Belt parcels in this area which were found to make a ‘high’ or ‘high+’ contribution to the Green Belt purposes.</u></b></p> <p><b><u>4.24.8 The site has potential to form a logical extension to the Omega employment site. However, there are current highway and accessibility constraints that would require mitigation, including the provision of access across land in separate ownership. Further, as Junction 8 of the M62 experiences congestion and capacity issues, the cumulative impacts of development of this site would need to be addressed in conjunction with Warrington Borough Council and Highways England. Due to the location of the site within 1km of an area of 20% of the most deprived population in the UK, development of this site would help to reduce poverty and social exclusion. This site therefore has clear potential to meet longer term employment needs, and by safeguarding it, there</u></b></p>		
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		<p><u>is time to address the highways and access issues noted.</u></p> <p><u>2ES – Land North East of Junction 23 M6 (South of Haydock racecourse), Haydock</u></p> <p><u>4.24.9 The Green Belt Review found the parcel of land generally reflecting this site boundary to make a ‘high’ overall contribution to the Green Belt purposes. Whilst ordinarily a site with such a score would not be considered further, there is a clear need to provide sufficient land for employment both within the plan period, and beyond it. Given the importance of meeting such needs, coupled with the potential of the site to meet the size and locational requirements of the market, there are exceptional circumstances to safeguard this site for longer term needs beyond the Plan period. Whilst there are clear harms in relation to the development of this site, including harm to Green Belt and adverse landscape impacts, it should also be noted that the site is located within 1km of an area with the 20% most deprived population in the UK, so development here in the longer term would help to reduce poverty and exclusion. Whilst the site did not score as well as the allocated employment sites through the Green Belt Review, the need to make provision for employment land beyond the Plan period forms the basis for the exceptional circumstances to justify the removal of this site from the Green Belt for safeguarding.</u></p> <p><u>Housing safeguarded sites</u></p> <p><u>1HS – Land south of Leyland Green Road, North of Billinge Road and East of Garswood Road, Garswood</u></p>		
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		<p><b><u>4.24.10 The Green Belt Review (2018) found the sub-parcel of Green Belt land containing this site to make a ‘medium’ contribution to the Green Belt purposes and has a ‘medium’ development potential. The site is within walking distance of a local convenience shop and is readily accessible by bus and rail. There are not considered to be any technical constraints to delivering development on this site that cannot be satisfactorily addressed over the necessary timeframe. However, as the site projects further into the countryside than housing allocation 1HA, it is considered to be a less logical extension to the village within the Plan period. On that basis, site 1HA is allocated for development within the Plan period, and this site is safeguarded for development subsequent to that, beyond the end of the Plan period to meet longer term needs, creating a logical phased extension of the village both within and beyond the Plan period.</u></b></p> <p><b><u>2HS – Land between Vista Road and Belvedere Road, Earlestown</u></b></p> <p><b><u>4.24.11 The Green Belt Review (2018) found the sub-parcel of land that contains this site to make a ‘medium’ contribution overall to the Green Belt purposes, and also found the site to have ‘good’ development potential. The site proposed for safeguarding sits within a notable indentation in the existing urban edge and benefits from clearly defined boundaries. There are not considered to be any technical constraints that cannot be addressed satisfactorily to enable this site to meet development needs beyond the end of the Plan period.</u></b></p>		
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		<p><b><u>'low' overall contribution to the purposes of the Green Belt and has 'medium' development potential. The site is in a sustainable location, within walking distance of a local convenience shop and public transport facilities. However, the highway network in the surrounding area has a number of constraints, and further work is required prior to development coming forward. Further, attenuation measures will be required to limit noise from the railway line running along the eastern site boundary. However, the site is considered able to contribute to potential development needs beyond the end of the Plan period, and by safeguarding the site, there is sufficient time for the above issues to be addressed.</u></b></p> <p><b><u>5HS – Land West of Winwick Road and South of Wayfarers Drive, Newton-le-Willows</u></b></p> <p><b><u>4.24.15 The Green Belt Review (2018) found the sub-parcel of land within which this site sits to make a 'low' overall contribution to the Green Belt purposes and have 'medium' development potential. The site is within a sustainable location, close to a railway station. The site is affected by a number of constraints, which will require further investigation before development can be brought forward, including the difficulty of providing a secondary access to the site, the proximity to a Local Wildlife Site and a historic landfill site in close proximity to the site (to the south), and associated potential contamination issues. There is also a railway line to the east of the site, so noise attenuation measures would be required. The sub-parcel is considered suitable to help meet needs in the longer term</u></b></p>		
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		<p><b><u>beyond the Plan period, and the safeguarding of the site will enable the required further investigation in relation to the above constraints to make efficient use of land within the site.</u></b></p> <p><b><u>6HS – Land East of Chapel Lane and South of Walkers Lane, Sutton Manor</u></b></p> <p><b><u>4.24.16 The Green Belt Review (2018) found the sub-parcel of land that reflects this site to make a ‘low’ overall contribution to the Green Belt purposes as it is well contained with strong boundaries and does not significantly contribute to the wider strategic gap. The site has ‘medium’ development potential. The site does project notably outwards into the countryside from the current urban edge and is considered more suitable as a longer term extension of the urban area, contributing to meeting housing needs after the end of the Plan period. Other technical constraints on the site (such as the presence of protected woodland and a Local Wildlife Site) are considered able to be satisfactorily addressed.</u></b></p> <p><b><u>7HS – Land South of Elton Head Road (adjacent to St. John Vianney Primary School), Thatto Heath</u></b></p> <p><b><u>4.24.17 The Green Belt Review (2018) found the sub-parcel that broadly reflects this site boundary to make a ‘low’ contribution to the Green Belt purposes as it is well contained with strong boundaries and does not significantly contribute to the wider strategic gap. The site was also considered to have ‘medium’ development potential. The site is sustainably located within walking distance of a local convenience shop and accessible by public</u></b></p>		
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		<p><u>transport users and the local highway network. As the surrounding area includes opportunities for redevelopment of previously developed sites, to ensure an appropriate phasing of development within the Thatto Heath area, it is appropriate to delay any development on this site until after the end of the Plan period. Therefore, it is safeguarded to meet development needs for the longer term.</u></p> <p><u>8HS – Land South of A580 between Houghtons Lane and Crantock Grove, Windle</u></p> <p><u>4.24.18 The Green Belt Review (2018) found the parcel of land that reflects this site boundary to make a ‘low’ overall contribution to the Green Belt, with a ‘medium’ development potential. The site comprises a significant greenfield site that forms a sizeable outward extension of the urban area into the countryside. The site also has a number of technical issues which would need to be addressed prior to development, including required significant improvements to highways infrastructure and suitable ecological evidence in relation to the potential of the site to provide functionally linked habitat for bird species, which may require a mitigation strategy. Such issues could take some time to address. Furthermore, given the scale of the site, some social infrastructure (such as a primary school) is likely to be required. There are further physical constraints in relation to the site, which could likely be addressed satisfactorily. On the basis of the above, this site provides the opportunity to meet longer term development needs, and safeguarding the site will provide sufficient time to address the identified issues.</u></p>		
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MM012	54	LPA07 Section 1	"1 ... a) Secure the delivery of new or improved road, <b>rail</b> , walking, cycling, and / or bus infrastructure where required;"	For completeness.	Widens the range of benefits that could be achieved, but the SA findings are unlikely to change significantly.
		Section 2	"2. All proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement, <b><u>the scope of which must be agreed by the Council.</u></b> "	For clarity.	No implications for SA findings.
	55	Section 4	4. To minimise air and noise pollution and carbon emissions, non-residential forms of development that would generate a significant amount of transport movement by employees or visitors must be supported by suitably formulated Travel Plans. <b><u>Conditions and/or legal agreements will be used to ensure that Travel Plans submitted in such cases are fully implemented and monitored.</u></b>	To ensure that submitted travel plans are implemented.	Increases the likelihood that positive effects will be realised and negative effects avoided. No significant changes to overall SA findings though.
	55	Section 6	6. Direct access from new development on to the Strategic Road Network will only be permitted <b><u>as a last resort</u></b> , where agreed by Highways England <b><u>and where the necessary levels of transport accessibility and safety could not be more suitably provided by other means.</u></b>	For improved clarity.	No implications for SA findings.
	56	Reasoned Justification, paragraph 4.27.2	<u>Carbon Emissions and air quality</u> 4.27.2 Transport is a major source of carbon emissions that, in turn, area a major cause of climate change. Therefore, transport can play a key part in the development of a low carbon	For clarity	No implications for SA findings.

			<p>economy. Many of the priorities identified in this Policy will play an important part in helping to reduce carbon emissions resulting from transport, <b><u>and therefore supporting the Council’s Climate Change Emergency declaration.</u></b></p> <p>Measures to reduce the need to travel, widen travel choice and reduce dependence on the private car, alongside investment in low-carbon vehicle technologies area an important part of helping to meet national climate change targets. Similarly they form an important part of the Council’s drive to tackle air quality issues, particularly (but not exclusively) within Air Quality Management Areas ....”</p>		
57	Reasoned Justification, new paragraph to be inserted after paragraph 4.27.8		<p><b><u>“Proposed Major Road Network 4.27.9 As part of the Transport Investment Strategy published in 2017, the Government committed to creating a Major Road Network (MRN). Draft proposals were issued for consultation, outlining how a new MRN would help the Government deliver a number of objectives, including supporting housing delivery and economic growth. The creation of an MRN will allow for dedicated funding from the National Roads Fund to be used to improve this middle tier of the busiest and most economically important local authority ‘A’ roads. Parts of the A58 and A570, and the whole of the length of the A580 which falls in</u></b></p>	To include reference to the proposed major road network.	No implications for SA findings.

			<p><b><u>St Helens, have been proposed for inclusion in the MRN.</u></b></p> <p><u>Supporting Supplementary Planning Guidance</u>  <b>4.27.109</b> A new Supplementary Planning Document ....”</p>		
MM013	58	LPA08 Section 2	<p>“2. Subject to compliance with relevant legislation and national policy, development proposals will be expected to include or contribute to the provision, improvement or replacement of infrastructure that is required to meet needs arising from the development proposal <del>and / or to serve the needs of the wider area.</del> This may include direct provision of on-site or off-site infrastructure and / or financial contributions that will be secured by:</p> <p>a) Section 106 .....</p>	To ensure compliance with relevant legislation and national policy.	No implications for SA findings.
	59	Section 5	<p>“5. When assessing planning proposals, the Council and other decision makers will pay due regard to any impact that developer contributions towards infrastructure provision or other policy requirements may have on the economic viability of new development. In this context, consideration will be given to economic viability evidence including any site specific development appraisal that may have been submitted to determine the ability of the development scheme to support the required level of contributions. <b><u>In light of the viability evidence, where a developer can demonstrate that meeting all policy requirements would not be viable, a pragmatic approach will be taken to s106 contributions on sites within zone 1.</u></b>”</p>	To ensure the policy is effective and positively prepared	No implications for SA findings.

	59	Section 6	<p><u>"Hierarchy of Developer Contributions</u></p> <p>6. Decision makers will, as a general rule, apply the following hierarchy for developer contributions in cases where viability constraints can be demonstrated (with i) being the highest priority):</p> <p>i) contributions that are essential for public safety (for example essential highway works or flood risk mitigation) or to achieve a minimum acceptable level of design quality;</p> <p>ii) contributions that are necessary to provide affordable housing or to address a local infrastructure requirement or deficiency that would be caused or exacerbated by the development, <b><u>depending on site surroundings and the level of existing infrastructure</u></b>, for example education needs or greenspace provision in areas of deficit; and</p> <p>iii) contributions that would not fall into categories i) or ii) as set out above."</p>	For improved clarity	No implications for SA findings.
MM014	62	<b>LPA09</b> Section 1	<p>"1. Green Infrastructure in St Helens Borough comprises a network of multi-functional natural assets, including green space, trees, woodlands, mosslands, grasslands and wetlands, located within urban, semi-urban and countryside <b><u>rural</u></b> areas."</p>	For improved clarity.	No implications for SA findings.
	62	Section 4	<p>"4. ... Development that would result in the loss, fragmentation or isolation of green infrastructure assets will be refused. The only exception to this will be where it has been demonstrated that:</p> <p><b><u>a)</u></b> appropriate protection or retention of Green Infrastructure assets cannot be achieved <b><u>in the pursuit of wider planning objectives</u></b>;</p> <p><b><u>b)</u></b> the development would bring benefits that</p>	For improved clarity.	No implications for SA findings.

			<p>would over-ride the resultant harm; and  <b>c)</b> there are no realistic alternatives to the proposed development that would avoid such harm.</p> <p>In such cases, mitigation, <b><u>for example, in the form of incorporating the identified Green Infrastructure assets into the scheme design and layout through a masterplanning process to maintain the key Green Infrastructure assets and connections,</u></b> and / or as a last resort compensatory provision will be required.”</p>		
	63	Reasoned Justification, paragraph 4.33.1	<p>“4.33.1 Policy LPA09 aims to protect, enhance and sustain the Borough’s natural assets and increase accessibility to them and connectivity between them, whilst protecting and enhancing landscape character, to ensure that the natural environment underpins the quality of life. The Green Infrastructure network in the Borough has a wide range of functions and values for recreation and tourism, air quality (<b><u>supporting the Council’s Climate Change Emergency declaration</u></b>), public access, health, heritage, biodiversity, water management and landscape character; providing a sense of place ...”</p>	For clarity.	No implications for SA findings.
		Reasoned justification, paragraph 4.33.2	<p>“4.33.2 <del>The Green Infrastructure network includes, (in addition to urban greenspaces, trees, and water bodies etc.) the countryside around the towns, which accounts for around 50% of the Borough’s land area. This is predominantly productive farmland. The</del></p>	For clarity to improve the definition of GI and ensure consistency between the reasoned justification, policy, Plan glossary and NPPF.	No implications for SA findings.

			<p>importance of countryside around the Borough's more urban locations was recognised by the pilot study Countryside In and Around Towns undertaken with the Countryside Agency (now Natural England) in 2006. In implementing Policy LPA09 (in both urban and rural areas) the Council will seek to liaise closely with, and where necessary work in partnership with, landowners."</p>		
MM015	66	LPA10 Section 3	<p>"3. Proposals for development within site 7EA will be required to:</p> <p>a) satisfy the masterplanning requirements set out in Policy LPA04.1</p> <p>.....</p> <p>h) make provision for the positive management of existing and new environmental assets; and</p> <p>i) put training schemes in place (where practicable) to increase the opportunity for the local population to obtain access to and employment at the site; <b>and</b></p> <p><b><u>j) ensure the timely delivery of the rail terminal infrastructure of the SRFI or other rail served employment development, in accordance with the comprehensive masterplan to be prepared for the whole site as required by Policy LPA04.1, section 2. Within this, details of the phasing for the whole site must include a clear and justified employment floorspace trigger for the delivery of the rail terminal infrastructure.</u></b>"</p>	To ensure a clear trigger for the delivery of the rail terminal infrastructure will be set out when the site comes forward for development.	No implications for SA findings.
	66	Section 4	<p>"4. That part of the site 7EA which falls to the west of the M6 is safeguarded from all forms of development <b><u>unless it can be shown that such development within it will not prejudice, or</u></b> so that it may provide, <b><u>effective and deliverable</u></b> future siding facilities in connection with the</p>	For improved clarity	No implications for SA findings.

			development of an SRFI or other rail-enabled development within the part of the site which falls to the east of the M6 (see policies map).”		
MM016	70	<b>LPA11</b>	<p>“The Council will work with its health and wellbeing partners to promote public health principles, maximise opportunities for people to lead healthy and active lifestyles, and reduce health inequalities for residents within the Borough. <del>Planning decisions and processes will be used to</del> <b>Through the planning system, the Council will seek to:</b></p> <ol style="list-style-type: none"> <li>1. encourage improved access ... “</li> <li>2. ensure the provision of easy-to-maintain, safe and attractive public areas and green spaces to serve new development that minimise the opportunity for and fear of crime <b>and anti-social behaviour</b> and that promote social cohesion and mental wellbeing;</li> </ol> <p>....”</p>	For improved clarity.	No implications for SA findings.
MM017	72	<b>New Policy LPA12 and associated Reasoned Justification</b>	<p><b>4.40 Policy LPA12 – Parkside West</b>  <b>Policy LPA12: Parkside West</b></p> <ol style="list-style-type: none"> <li>1. <b><u>The Parkside West site (identified as site 8EA in Policy LPA04) shall be considered suitable for B2 and B8 uses.</u></b></li> <li>2. <b><u>Proposals for development within site 7EA will be required to:</u></b> <ol style="list-style-type: none"> <li>a. <b><u>Satisfy the masterplanning requirements set out in Policy LPA04.1;</u></b></li> <li>b. <b><u>Provide safe and convenient access to and from the M6 for</u></b></li> </ol> </li> </ol>	To provide a bespoke policy for the Parkside West site allocation due to its scale and relationship with Parkside East.	Screen in

			<p><b><u>Heavy Goods Vehicles and other vehicles:</u></b></p> <ul style="list-style-type: none"> <li>i. <b><u>Access to an initial phase of development can (subject to detailed assessment) be provided off the A49 (Winwick Road)</u></b></li> <li>ii. <b><u>Later phases of development should be served by a new link road from the east (linking to Junction 22 of the M6)</u></b></li> <li>iii. <b><u>The amount of development achievable within each phase must be determined using a comprehensive transport assessment to be approved by the relevant highway authorities;</u></b></li> <li>c. <b><u>Suitably mitigate any adverse impacts on the M6 (Junction 22) or other parts of the highway network (strategic and local);</u></b></li> <li>d. <b><u>Include suitable measures to control impact of increased traffic movement or uses within the site on residential amenity, noise and / or air quality in the surrounding area;</u></b></li> <li>e. <b><u>Include measures to mitigate any adverse impacts on the Battle of</u></b></li> </ul>		
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			<p><b><u>Winwick Registered Battlefield and other heritage assets in the area;</u></b></p> <p>f. <b><u>Secure suitable access to the site by walking and cycling, such as, the provision of segregated walking and cycling routes which must run through the site and link to nearby highways; and improved bus provision, including upgraded bus stops;</u></b></p> <p>g. <b><u>Establish and implement a Travel Plan incorporating measures to encourage travel to / from the development by sustainable modes;</u></b></p> <p>h. <b><u>Make provision for the positive management of existing and new environmental assets; and</u></b></p> <p>i. <b><u>Put training schemes in place (where practicable) to increase the opportunity for the local population to obtain access to employment at the site;</u></b></p> <p><b><u>The development of Parkside West (site 8EA) must ensure that the part of site 7EA (Parkside East) which falls to the west of the M6 (as shown on the Policies Map) is safeguarded from all forms of development unless it can be shown that such development within it will not prejudice, or may provide, effective and deliverable future siding facilities in connection with the development of an SRFI or other rail-</u></b></p>		
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**enabled development on land to the east of the M6 (site 7EA).**

**4.41 Policy LPA12:**

**Strategic Aims, Objectives and Key Delivery Mechanisms**

<b><u>Strategic Aims Met</u></b>	<b><u>SA 1, SA 3, SA 5</u></b>
<b><u>Strategic Objectives Met</u></b>	<b><u>SO 1.1, SO 1.3, SO 3.1, SO 5.1, SO 5.4</u></b>
<b><u>Is this a 'strategic' or 'local' policy?</u></b>	<b><u>Strategic</u></b>
<b><u>Key Delivery Mechanisms</u></b>	<ul style="list-style-type: none"> <li>• <b><u>Development management process</u></b></li> <li>• <b><u>Liverpool City Region Combined Authority funding</u></b></li> <li>• <b><u>St Helens Infrastructure Delivery Plan</u></b></li> </ul>

**4.42 Reasoned Justification**

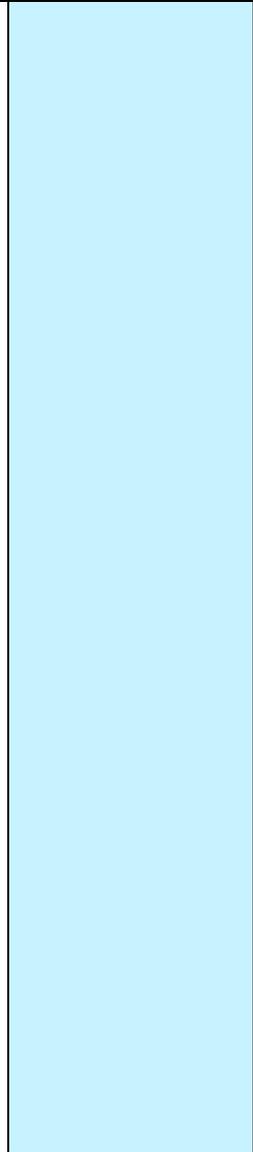
**4.42.1 The Core Strategy (2012), Policy CAS 3.2 identified the site of the former Parkside Colliery and immediately adjacent land as a strategic location with the potential to facilitate the transfer of freight between road and rail. It was considered that a deliverable and viable SRFI could be developed on the western side of the M6, provided a number of criteria were met. On that basis, the principle of delivering a Strategic**

**Rail Freight Interchange (SRFI) in this location was supported.**

**4.42.2 Furthermore, Policy CAS 3.2 recognised that there may be a need for a larger area of land, extending to the east of the M6 to accommodate an enlarged SRFI, on the basis of operational, viability and commercial reasons. Therefore, the Policy supported the development of land to the east of the M6 provided that 1) the area of land to the west of the M6 was developed first, and 2) that the SRFI would be undeliverable without the additional land to the east of the M6.**

**4.42.3 Since the Core Strategy, the policy in relation to Parkside has evolved to reflect the latest evidence. The Council commissioned consultants AECOM to undertake the Parkside Logistics and Rail Freight Interchange Study (2016). The findings of this Study informed the proposed approach to Parkside in this Plan: the development of Parkside East as the location of a SRFI (together with other industrial and logistics uses), and the development of Parkside West as a separate, though linked, employment site for logistics use, which will be served by road only, although it will accommodate rail siding facilities for incoming trains linked to Parkside East. Parkside West could also potentially be served from the SRFI by tractor units.**

**4.42.4 Accordingly, Parkside West is allocated for 79.57ha of employment land for B8 and B2 uses. This area excludes 5.58ha of land at Parkside West required to facilitate rail access to Parkside East (7EA) and a further 12.1ha of land**



			<p><u>occupied by a spoil heap, which is not considered developable.</u></p> <p><u>4.42.5 The delivery of this site will be supported by the delivery of the Parkside Link Road, which will provide access to the M6 Junction 22 from both the Parkside West and East sites. The Council has secured the funding to progress the delivery of the link road scheme.</u></p> <p><u>4.42.6 The allocation of Parkside West will contribute to meeting the identified employment needs over the Plan period as set out in Policy LPA04 and explained in the associated Reasoned Justification. The site also contains a significant amount of Previously Developed Land, and so its allocation will contribute to the effective use of land in the Borough to meet identified development needs.</u></p> <p><u>4.42.7 The site is located within close proximity of an area within the 20% most deprived population in the UK, and therefore offers not only wider economic benefits, but also presents the opportunity to help reduce poverty and social exclusion in the local areas and provide regeneration benefits.</u></p> <p><u>4.42.8 The exceptional circumstances justifying the removal of this site from the Green Belt is set out in the Reasoned Justification of Policy LPA04.</u></p>		
MM018	72	New Policy LPA13 and associated Reasoned Justification	<p><u>"4.43 Policy LPA13: Bold Forest Garden Suburb</u></p> <p><u>Policy LPA13: Bold Forest Garden Suburb</u></p> <p><u>The Bold Forest Garden Suburb site (identified as site 4HA in Policy LPA05) is allocated for housing development, with an indicative site</u></p>	To provide a bespoke policy for the Bold Forest Garden Suburb site allocation due to its scale.	Screened in

**capacity of 2,988 dwellings, of which a minimum of 510 dwellings will be delivered during the plan period. The site boundaries are set out in the Appendix 5 site 4HA profile and on the Policies Map.**

- 1. Development of the site should deliver the following requirements:**

**Housing**

- a) **At least 30% of homes to be delivered on site should fall within the definition of 'affordable housing' in accordance with Policy LPC02, with the affordable housing mix reflecting Policy LPC02, part 3), unless up-to-date and robust evidence indicates otherwise;**
- b) **Provide an appropriate mix and standard of housing to meet local needs in accordance with policy LPC01;**
- c) **Deliver at least 10% of the site's energy needs from renewable and / or other low carbon energy sources in accordance with Policy LPC13, part 4), unless this is shown to not be practicable or viable;**

**Design and Layout**

- d) **The development of this site should be consistent with the vision, aims, objectives and policies of the Bold Forest Park Area Action Plan (2017);**
- e) **The layout must avoid causing excessive noise or disturbance to occupiers of existing dwellings and businesses within or around the site and for users of**

			<p><b><u>walking and cycling routes and open spaces;</u></b></p> <p><b><u>Social Infrastructure</u></b></p> <p>f) <b><u>Contributions towards primary and secondary school provision in the area, to meet the identified need for additional school places, through the extension of existing schools and / or delivery of new school facilities;</u></b></p> <p>g) <b><u>Provision of a new GP surgery within the development, which could be in the form of the relocation and expansion of an active practice onto the site;</u></b></p> <p>h) <b><u>Provide a small local centre containing community and retail facilities;</u></b></p> <p><b><u>Play, Open Space and Green Infrastructure</u></b></p> <p>i) <b><u>Provision of an accessible, comprehensive, high quality and connected network of multi-functional green spaces in accordance with a Green Infrastructure Plan to be provided as part of the comprehensive masterplan approach for the whole site as required by Policy LPA05.1, section 2f);</u></b></p> <p>j) <b><u>Retention of existing and provision of new high quality, well designed and accessible open space and play space provision in accordance with Policies LPC05 and LPD03. Details of how open spaces will be subsequently maintained</u></b></p>		
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			<p><b><u>will need to be considered through the masterplanning process;</u></b></p> <p><b><u>Landscape and biodiversity</u></b></p> <p><b>k) <u>The development must provide a well landscaped setting including extensive green links through and around the site, and tree planting to reduce impact on the landscape and promote the objective of the BFPAAP to increase tree cover by 30% across the Bold Forest as a whole;</u></b></p> <p><b>l) <u>Any adverse impacts on biodiversity interests within the existing Local Wildlife Site (LWS 108 as indicated on the Policies Map) and the proposed extension to this must be either avoided or minimised. Any resultant harm must be adequately mitigated;</u></b></p> <p><b><u>Access and Highways</u></b></p> <p><b>m) <u>Provision of safe access arrangements for the site;</u></b></p> <p><b>n) <u>Creation of a permeable layout with a range of highways provided through the site with access via the B5204, Neills Road and Gorsey Lane;</u></b></p> <p><b>o) <u>Provision of a bus service through the site between Clock Face and St Helens Junction, and the layout of the site must be compatible with this;</u></b></p> <p><b>p) <u>Provision of a permeable network of foot, bridleway, and cycle routes through the site to facilitate access between homes,</u></b></p>		
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			<p><b><u>workplaces, recreational facilities, and other key services in the area. These must, where necessary, be segregated to ensure safety and include new provision in line with Policy INF6 “Creating an Accessible Forest Park” of the Bold Forest Park Area Action Plan 2017;</u></b></p> <p><b>q) <u>Provision of any other measures necessary to secure suitable access to the site by walking, cycling and public transport such as:</u></b></p> <p style="padding-left: 20px;"><b>a. <u>The provision of new accessible bus stops to an agreed specification through the site so that none of the proposed dwellings is more than 400 metres walking distance from a bus stop; and</u></b></p> <p style="padding-left: 20px;"><b>b. <u>A financial contribution towards the improvements of St Helens Junction station;</u></b></p> <p><b>r) <u>Masterplanning of site must take into account the opportunity to expand the Greenway network, and make provision for this in line with Policy LPC07, and the accompanying Figure 7.2; and</u></b></p> <p><b>s) <u>Masterplanning of the site must be informed by the findings of the Bold Forest Garden Suburb Transport Review (August 2019) and any other relevant evidence.</u></b></p>		
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**2) As above, financial contributions or the provision of on-site infrastructure for education, health and offsite highway works may be required. The detailed infrastructure requirements to support the delivery of the site will be further assessed through the comprehensive masterplanning process.**  
**3) In accordance with Policy LPA05.1, section 2), any planning application for development within the site will need to be supported by a comprehensive masterplan covering the whole of the Bold Forest Garden Suburb site, which will need to set out the listed details in sub-sections a) to i) as a minimum. Any proposal will need to demonstrate how it complies with this masterplan in order to ensure a comprehensive, co-ordinated and well designed development is delivered with the necessary supporting infrastructure.**

**4.44 Policy LPA13:  
Strategic Aims, Objectives and Key Delivery Mechanisms**

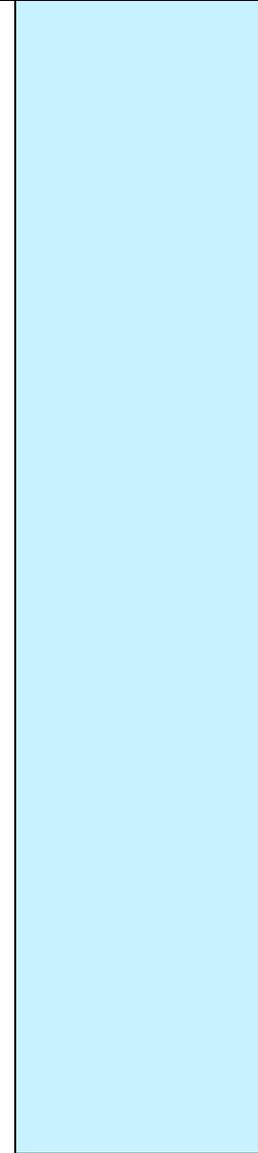
<b><u>Strategic Aims Met</u></b>	<b><u>SA 1, SA 2, SA 3, SA 4, SA 6</u></b>
<b><u>Strategic Objectives Met</u></b>	<b><u>SO 1.1, SO 1.2, SO 2.1, SO 2.3, SO 3.1, SO 4.1, SO 6.1, SO 6.3</u></b>
<b><u>Is this a 'strategic' or 'local' policy?</u></b>	<b><u>Strategic</u></b>

			<p><b><u>Key Delivery Mechanisms</u></b></p>	<ul style="list-style-type: none"> <li>• <b><u>Development management process</u></b></li> <li>• <b><u>Masterplanning process</u></b></li> <li>• <b><u>St Helens Infrastructure Delivery Plan</u></b></li> </ul>		
<p><b><u>4.45 Reasoned Justification</u></b>  <b><u>4.45.1 The Bold Forest Garden Suburb (BFGS) is the largest allocation identified in the Plan. It comprises a large area of undeveloped agricultural land, located on the urban edges of Clock Face, Sutton and Bold. The site contains disused colliery buildings, a scattering of farm buildings, a transmitter station and some limited areas containing trees and hedges. A line of electric pylons run through the site along the north-western boundary, and a Local Wildlife Site 108 (LWS) (Tunstalls Farm), lies to the north-western side of the site, beyond the site boundary. Existing residential development surrounds the site on three sides, including Reginald Road Industrial Estate; the southern edge, for the most part, is defined by Gorsey Lane.</u></b>  <b><u>4.45.2 The Green Belt Review (2018) informed this allocation. The Review identified that land at Bold forms a major strategic opportunity to provide a wide range of new housing in an area that is close to some of the more deprived parts of the Borough, contributing to the balanced growth of the Borough. It also has good accessibility to jobs and services and high</u></b></p>						

levels of compliance with other aspects of the Green Belt Review methodology. This land therefore forms a substantial element within the overall housing strategy, striking the right balance between meeting housing and employment development needs, while protecting the most valuable environmental resources and the overall function of the Green Belt.

4.45.3 The Review concluded that the BFGS site as a whole should be allocated for development, noting that it “forms a notable indent in the alignment of the southern edge of the built-up area of St Helens.” It added that due to “the size of the parcel, it has the potential to form a ‘garden suburb’ extension to the south of Bold, which would be sufficiently large to include new social infrastructure (such as a new primary school, local retail centre and potentially health facilities). It would constitute a major strategic opportunity to provide a wide range of new housing in an area that is close to some of the more deprived parts of the Borough.”

4.45.4 The BFSG is located within the Bold Forest Park, and therefore the development of this site allocation must be consistent with the vision, aims, objectives and policies of the Bold Forest Park Area Action Plan (BFPAAP) (2017), which forms part of the Development Plan. The requirements set out in this policy provide a strong and robust foundation in developing the vision and objectives for the Bold Forest Garden Suburb, which will be further refined through the masterplanning process.



**4.45.5 Throughout the preparation of the Local Plan, the Council have consulted with various internal and external infrastructure providers, including the Council’s Schools Support Services Team, Highways England and St Helens Clinical Commissioning Group (CCG) to ascertain the level of infrastructure required to support the BFGS. This work will continue through the masterplanning process for the site.**

**Housing**

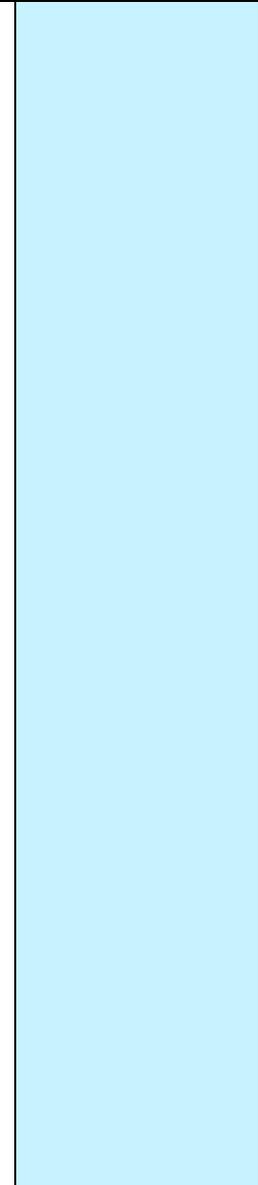
**4.45.6 The site has an indicative capacity of 2,988 dwellings (in accordance with Table 4.5), of which it is anticipated that some 510 dwellings would be completed within the Plan period (i.e. by 31 March 2037).**

**4.45.7 Given the size of the BFGS site, a lead in time of seven years on adoption of the Plan has been applied for the BFGS to allow for a thorough masterplanning process. This work will then form the basis of a site-specific Supplementary Planning Document (SPD).**

**4.45.8 A build-out rate assumption of 60 units per annum has been used for the BFGS, reflecting a cautious approach due to uncertainties in relation to uncertainty on the economic impacts of the Covid-19 pandemic and the supporting infrastructure required to deliver the site. Actual build-out rates will depend on the number of housebuilders and sale centres that are operational at any one time on the site.**

**Social Infrastructure**

**4.45.9 The Council’s School’s Support Services Team have considered capacity at the existing schools in the area, both in terms of primary and secondary provision. It is likely that the BFGS**



will necessitate the expansion and / or provision of new school facilities. Work to consider school needs is ongoing in terms of determining which schools may be capable of extension and where a new school may be required, and this will feed into the BFGS masterplanning process.

4.45.10 St Helens CCG advised that there is a deficiency of healthcare practitioners to the south of the Borough, particularly in Bold. Therefore, there could be a need for a new general practice surgery to be constructed within the BFGS to accommodate the increased demand for healthcare in Bold (and from surrounding areas). The CCG have indicated that this new practice could be in the form of relocating and expanding an active practice onto the site. This need will be further refined through the masterplanning process.

4.45.11 The BFGS is not within walking distance of a local or district centre. However, due to its size it is considered that it could support a small local centre containing community and retail facilities, which will make the development more sustainable. Retail provision will be looked at in more detail through the comprehensive masterplanning process and in the subsequent SPD.

Transport

4.45.12 Consultants WSP undertook an initial transport review to understand the likely impact of the BFGS on the wider highways network and to consider transport initiatives that could support development of the site. The Review consists of two key elements: a) examination of the likely trip generation, distribution and route

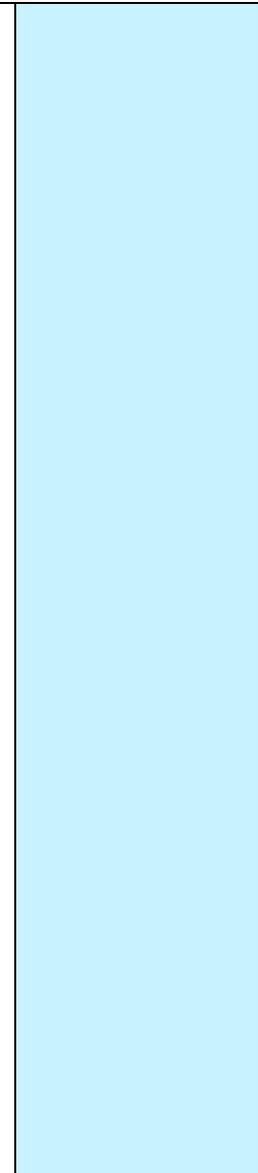
assignments on the local highway network, based on a core and alternative scenario; and, b) preparation of a study report setting out the findings of a review of local transport infrastructure. It also identifies strategic network improvements and likely masterplanning design requirements.

4.45.13 In its initial findings, the Review anticipates that there will be highways junctions that will experience impact in terms of traffic flow as a result of development but that there are opportunities to achieve a significant modal shift towards sustainable travel that would reduce the impact of the proposed development on the local highway network. Highways England have provided initial comments on the Review and the Council will continue to engage with Highways England throughout the BFGS masterplanning process.

4.45.14 The Review is an initial element of the masterplanning process that will be required prior to the site being developed.

Masterplanning

4.45.15 The site is under the control of multiple landowners, and it is therefore particularly important that an appropriate mechanism is in place to ensure a comprehensive, well connected and well designed development is delivered on the site, with the necessary supporting infrastructure. Section 2 of Policy LPA05.1 provides for this mechanism in the form of any planning application for development



			<p><b><u>within the site needing to be supported by a comprehensive masterplan covering the whole site, which sets out a wide range of details, as listed in sub-sections a) to i). In the case of the BFGS, this is particularly critical to ensure that a high quality development is delivered in a comprehensive manner, and the various phases of development can be delivered in accordance with an overarching, agreed masterplan, and in a timely manner.”</u></b></p>		
MM019	73	<p><b>LPB01</b> New Section 2</p>	<p><b><u>“2. The English Cities Fund Regeneration Partnership will help deliver a comprehensive redevelopment of the Town Centre and Central Spatial Area, including new commercial activity, upgraded infrastructure, the provision of quality housing, and the overall improvement of the social and economic viability of the area.</u></b></p> <p><b><u>23.</u></b> Proposals for retail and leisure development will be directed ....”</p> <p><i>Subsequent policy sections will be renumbered accordingly</i></p>	<p>To provide a factual update following the Council’s strategic partnership with the English Cities Fund.</p>	<p>No implications for SA findings.</p>
	73	<p>Section 3 (to be renumbered Section 4)</p>	<p><b><u>“34.</u></b> Proposals for the change of use of units in the Primary Retail Frontages <b><u>Shopping Area</u></b> in St Helens Town Centre will be refused unless they would be to <b><u>a Class A1<sup>45</sup> retail use or</u></b></p>	<p>To align with the NPPF, and reflect changes to the Use Class Order (particularly in relation to Use Class E and the former Use Class A1).</p>	<p>No implications for SA findings.</p>

			<p><del>another main town centre use or uses that would contribute positively to the overall vitality and viability of the centre. Development proposals within the Primary and Secondary Frontages that would not result in an active ground floor use with a window display frontage will be refused.</del></p>		
	73	Footnote 45	<p><i>Delete footnote 45</i></p>	<p>To reflect its removal in the policy text.</p>	<p>No Implications for SA findings.</p>
	74	Reasoned Justification Paragraph 5.3.1	<p>“5.3.1 The St. Helens Central Spatial Area (as shown in Appendix 11 <b><u>and on the Policies Map</u></b>) includes the Town Centre and its surrounding hinterland. This includes ...”</p>	<p>For improved clarity.</p>	<p>No implications for SA findings.</p>
	75	Reasoned Justification, paragraphs 5.3.6 and 5.3.8	<p>“5.3.6 ..... The Strategy set out a vision for the future of the town centre detailing thematic initiatives to deliver this. <b><u>In January 2020 the Council successfully received an initial £173,029 capacity fund as part of the Governments Town Deal initiative. The Council has now successfully secured significant investment of up to £25 million. This funding will be used to help increase economic growth with a focus on land use and regeneration, improved connectivity (both transport and better broadband connectivity), skills and employment, and heritage, arts and culture. A Town Investment Plan will be developed and will sit alongside the Town Centre Strategy.</u></b>”</p> <p>“5.3.8 ..... The 'Area of Opportunity', referred</p>	<p>To provide a factual update following the Council's successful bid to secure additional funding as part of the Town Deal initiative.</p>	<p>No implications for SA findings.</p>

			to in the Strategy, has been identified due to the potential to reconfigure and / or redevelop land and premises close to Church Square and Chalon Way for suitable town centre uses. <b><u>To support this initiative and to assist in the regeneration of the area, the Council is entering into a regeneration partnership with the English Cities Fund to deliver a comprehensive redevelopment of the Town Centre (and wider Borough on a phased basis).</u></b> ”	To provide a factual update following the Council’s strategic partnership with the English Cities Fund.	
	75	Reasoned Justification Paragraph 5.3.9	<p><del>“5.3.9 To guide the application of the policies concerning main town centre uses, a Primary Shopping Area and Primary and Secondary Retail Frontages have been identified in line with the definitions in the NPPF (see Appendix 11).”</del></p> <p><i>Re-numbering of subsequent Reasoned Justification paragraphs to be done.</i></p>	To align with the NPPF.	No implications for SA findings.
	75	Reasoned Justification Para 5.3.10 (to be renumbered 5.3.9)	<p><del>“5.3.10 The first preference for the location of new retail <b><u>Class E and Sui Generis retail main town centre uses</u></b> development is within the Primary Shopping Area. Proposals for retail <b><u>Class E and Sui Generis retail main town centre</u></b> uses that are ... ”</del></p>	Retail main town centres uses are now included in Use Classes E and Sui Generis.	No implications for SA findings.

	76	Reasoned Justification Paragraphs 5.3.13 – 5.3.14	<p><del>“5.3.13 The Primary Retail Frontages are areas where there should be a particular focus on retail uses. This is because such uses are a key driver of footfall and help to draw shoppers into the centre. Proposals for non-retail uses in these frontages will be resisted unless their approval would be consistent with the aim of maintaining and enhancing the overall functionality, vitality and viability of the town centre. Specific considerations to be taken into account when assessing such proposals in the Primary Retail Frontage include the existing proportion of retail uses, the nature of the proposed use and the location of the unit affected within the Primary Retail Frontage.</del></p> <p><del>5.3.14 The Secondary Frontages will provide greater opportunities for a diversity of uses such as restaurants, cinemas and non-retail business uses such as banks, estate agents and other services. The Council will resist proposals within the primary or secondary frontages that would result in the loss of an active ground floor use with open display windows.”</del></p> <p><i>Re-numbering of subsequent Reasoned Justification paragraphs to be done.</i></p>	To align with the NPPF.	No implications for SA findings.
MM020	77	<b>LPB02</b> Section 4	<p>“4. The delivery and implementation of a Council-led strategy to provide a framework for the future regeneration and development of the town centre will be supported. <b><u>The English Cities Fund Regeneration Partnership will help deliver a mix of residential, leisure, business and retail</u></b></p>	To provide a factual update following the Council entering into a strategic partnership with the English Cities Fund.	No implications for SA findings.

			<b><u>development all centred around the Town Centre.</u></b>		
	78	Reasoned Justification, paragraph 5.6.3	“5.6.3 The Council will seek to safeguard <b><u>and build upon</u></b> this important role and function by applying the 'town centre first' approach to ensure that Earlestown remains the Borough's second centre providing a highly sustainable location for retail and other services. <b><u>Through its partnership with the English Cities Fund the Council will work towards creating a mix of residential, leisure, business and retail development all centred around the Town Centre.</u></b> ”	To provide a factual update following the Council entering into a strategic partnership with the English Cities Fund.	No implications for SA findings.
	78	Reasoned Justification, paragraph 5.6.8	“5.6.8 To provide a focus for future development of the town centre and positively promote Earlestown as a location to live, <b><u>through the English Cities Fund Regeneration Partnership,</u></b> the Council and its partners intend to bring forward a dedicated Town Centre strategy, .....	To provide a factual update following the Council entering into a strategic partnership with the English Cities Fund.	No implications for SA findings.
MM021	79	<b>LPC01</b> Section 1	“1. New market and affordable housing <del>must</del> <b><u>should</u></b> be well designed to address local housing need and include a range of types, tenures and sizes of homes as informed by <b><u>up-to-date,</u></b> relevant evidence including the Borough’s latest Strategic Housing Market Assessment (SHMA).	For improved clarity and consistency with NPPF.	Word change is not as strong, but unlikely to have significant implications for SA findings.

79	Section 2	<p>“2. Where a proposal for new housing would be on a greenfield site on which the site as a whole would deliver 25 or more new homes, the Council will apply optional standards as set out in Parts M4(2) and M4(3) of the Building Regulations 2010 (as amended) so that:</p> <ul style="list-style-type: none"> <li>a) At least 20% of the new dwellings across the whole site must be designed to the “<del>accessible and</del> adaptable” standard set out in Part M4(2)<u>a</u>; and</li> <li>b) At least 5% of the new dwellings across the whole site must be designed to the “wheelchair user” <b>adaptable</b> dwellings standard set out in Part M4(3).</li> </ul> <p>.....”</p>	For clarity	No implications for SA findings.
79	Section 3	<p><del>“3. At least 5% of new homes on greenfield sites that would deliver 25 or more dwellings should be bungalows. Exceptions to paragraphs 1 to 3 of this Policy may be made where the applicant ....”</del></p>	The requirement is not justified in terms of need or viability.	Benefits for elderly population likely to be lower, but no significant effects.
79	Section 5 (to be re-numbered to section 4)	<p><del>“5.4. The Council will work with partners to facilitate the provision of <b>bungalows, and</b> specialist and supported housing for elderly and vulnerable people. Provision of sheltered housing, extra care housing, retirement accommodation and residential care homes should be easily accessible by walking and public transport to a suitable range of services to meet the needs of future occupiers.</del></p> <p>.....”</p> <p><i>Re-number subsequent policy sections.</i></p>	To include reference to encouraging bungalow provision.	No implications for SA findings.

81	Reasoned Justification Paragraph 6.3.3	<p>“6.3.3 ... extend this assessment of annual need up until the end of the Plan period (<del>2037</del>2035). Of the overall housing provision of <del>10,2069</del>234 dwellings (set out in Policy LPA05) it is therefore anticipated that about 2,<del>457</del>223 (24%) should be affordable. The amount of ...”</p>	To reflect the two year Plan period extension (from an end year of 2035 to 2037).	To simply reflect the extension of the Plan period by two years, and does not result in any change to the proposed site allocations. No implications for SA findings.
82	Reasoned Justification, paragraph 6.3.8	<p>“6.3.8 Having regard to these factors (including the findings of the St. Helens Local Plan Economic Viability Assessment 2018), Policy LPC01 requires that in new developments of 25 or more dwellings, at least 20% of the new homes will be constructed to ‘<del>accessible and</del> adaptable’ standards, as contained in Part M4(2)<del>a</del> of the Building Regulations, and that at least 5% of new homes should be designed to the ‘wheelchair user’ <del>adaptable</del> <b>adaptable</b> dwellings’ standards set down in Part M4(3) of the Building Regulations. This will ensure that a proportion of all homes available in the Borough <del>will be suitable and / or</del> can be adapted, without undue difficulty, for occupation by residents who are wheelchair users and to ensure that these homes will also be accessible to visitors with limited mobility. <b><u>A 12 month transition period will be applied from the adoption date of the Plan, following which time this requirement will apply to all relevant sites subject to a planning application (existing or newly made), unless an exception as outlined in section 4 of the Policy is demonstrated by site specific evidence.</u></b>”</p>	For clarity and to ensure the effectiveness of Plan implementation.	No implications for SA findings.

MM022	84	LPC02 Section 2	"2. Proposals for new open market housing developments of 4+ <b>10</b> units or more, <b>or when the number of units is not known, sites of 0.5ha or more,</b> will be required to...."	To ensure the Plan is compliant with the NPPF, and accommodates circumstances where the number of dwellings is unknown.	Captures a wider range of developments to ensure positive effects are likely to occur. No significant implications for the SA findings though.
	88	Reasoned Justification, paragraph 6.6.9	"6.6.9 The St. Helens Affordable Housing SPD (2010) will be updated as necessary to assist the implementation of Policy LPC02. <b>Furthermore, it is acknowledged that 'First Homes' have been introduced by the Government, and fall within the definition of 'affordable housing'. However, as this Plan is being progressed under the First Homes transitional arrangements, it is not required to reflect the First Homes policy requirement. Instead, this will be addressed in a future update of the Plan.</b>	For clarity on the implementation of the Plan.	No implications for SA findings.
MM0203	89	LPC03 Section 1	"1. The following sites are allocated for the provision of pitches to <b>help</b> meet the Borough's <b>identified</b> need for Gypsy and Traveller accommodation <b>of 18 pitches</b> over the Plan period, and are identified on the Policies Map: ..."	For clarity.	No implications for SA findings.
	90	Section 5	"5. In addition to meeting the criteria in paragraph 4 of this Policy, any proposals to provide accommodation for travelling show people must: a) be located and designed so as to avoid causing disturbance to occupiers of adjacent properties for example due to noise from the maintenance and / or testing of equipment; <del>and</del>	For clarity	No implications for SA findings.

			b) avoid prejudicing the operations of existing employment uses-; <b>and</b> <b>c) allow for the provision of suitable space and storage for rides and associated equipment, where applicable.”</b>		
	92	Reasoned Justification, paragraph 6.9.6	“ ... and a rise in the number of occupiers on non- authorised sites indicates that the overall (net) need for new pitches in the Plan period is likely to have risen to about 18 by 2016. <b><u>This is comprised of the 8 pitches identified within the GTAA, 4 private pitches which are not authorised but tolerated, an additional 2 unauthorised pitches and 4 pitches provided for the loss of pitches at Berry’s Lane which is a closed site and at Suez Street due to the construction of a bungalow on the site.</u></b> The existing provision of 12 pitches would therefore be likely, on its own to fall short of meeting needs. For this reason, Policy LPC03 allocates an additional site ...”	For clarity and to ensure the effectiveness of the Policy.	No implications for SA findings.
MM024	93	<b>LPC04</b> Section 2	<b><u>“2. The development of main town centre uses within the defined centres will be supported. Proposals for other uses in such locations will be considered having regard to the scale and nature of the proposal and the role and function of the centre.</u></b> Planning permission will only be granted for development that is appropriate in terms of its scale and nature relative to the role and function of each centre.”	For clarity.	No implications for SA findings.
MM025	98	<b>LPC05</b>  Reasoned Justification, paragraph 7.3.2	“Open space fulfils a variety of important functions of value to the public. For example, it provides opportunities for: formal and informal recreation and activities; play and social interaction; environmental enhancement and	For clarity.	No implications for SA findings.

			<p>attractiveness; wildlife conservation; education; food growing; and quiet contemplation. It provides strong health and well-being benefits for local people. <b><u>Furthermore, provision of new and / or enhancement of existing open spaces will support the Council’s Climate Change Emergency declaration.</u></b></p>		
	99	Reasoned Justification, paragraph 7.3.11	<p>“7.3.11 Where new residential development would result in a deficiency of open space or sports and recreation facilities in the locality, or be in a location where a deficiency already exists, it will be expected to include new, expanded or enhanced open space provision in accordance with Policy LPD03 (Open Space and Residential Development). Any requirement for new sports facilities will be additional to this. <b><u>Further, even where there is considered to be sufficient open space in quantitative terms, larger residential developments may be expected to provide certain types of open space (such as play areas for children and young people and amenity green space) to provide local recreational opportunities and visual relief as part of an attractive and well designed development.</u></b>”</p>	For improved clarity on the circumstances in which open space provision may be required.	No implications for SA findings.

	99-100	Reasoned justification, paragraphs 7.3.11 – 7.3.12 (inclusive of Table 7.1)	<i>Remove paragraphs 7.3.11 and 7.3.12 (inclusive of Table 7.1) from the reasoned justification for Policy LPC05, and add into the reasoned justification for Policy LPD03, and adjust paragraph numbering in both Reasoned Justification sections accordingly. Table 7.1 will also need to be renamed Table 8.1 to follow the table numbering convention, and references to this table updated in the ‘List of Tables’ (page 2) and within the policy text of LPC05 and LPD03.</i>	To improve the layout of the document and ensure the Reasoned Justification is appropriate to the policies.	No implications for SA findings.
MM026	101	<b>LPC06</b>	<p><b><u>“1. In accordance with NPPF Paragraph 171, the Council is committed to ensuring the protection and enhancement of St Helen’s biodiversity and geological asset and interests. In order to do this, the Council will have regard to the following hierarchy of nature Conservation sites when making planning decisions, according to their designation as follows:</u></b></p> <ul style="list-style-type: none"> <li>- <u>International and European Sites</u></li> <li>- <u>Sites of Special Scientific Interest</u></li> <li>- <u>Local Wildlife Sites</u></li> <li>- <u>Local Nature reserves</u></li> <li>- <u>Local Geological Sites</u></li> <li>- <u>Priority Habitat(s)</u></li> <li>- <u>Impact on Legal Protected Species and/or priority Species</u></li> </ul> <p><b><u>The following hierarchy of sites and habitats are found in the Borough:</u></b></p> <p><b><u>i) International</u></b></p> <p><b><u>• Functionally Linked Land (FLL) for sites of international nature importance (European Sites) including the Ribble and Alt Estuaries Special Protection Area (SPA), Martin Mere SPA, the Mersey Estuary SPA, Liverpool Bay SPA.</u></b></p>	To avoid repetition of national policy, improve clarity and policy effectiveness and include Borough level implications.	No implications for SA findings.

			<p><b>ii) <u>National</u></b></p> <p><b><u>• Sites of national nature importance, which in St.Helens Borough include 2 Sites of Special Scientific Interest, Stanley Bank Meadow and Highfield Moss</u></b></p> <p><b>iii) <u>Local</u></b></p> <p><b><u>• Sites of local nature and geological importance, which in St.Helens Borough include Local Nature Reserves (LNRs), Local Wildlife Sites (LWSs) and Local Geology Sites (LGSs)</u></b>  <b><u>In addition, priority habitats and species, and legally protected species.</u></b></p> <p><u>European Sites</u></p> <p>4- <b>2.</b> Development that is likely to have a significant effect (either alone or in combination with other plans or projects) on one or more internationally important site(s), including any areas of supporting habitat that are functionally linked to the site(s), must be accompanied by sufficient evidence to enable the Council to make a Habitats Regulations Assessment. Adverse effects should be avoided, or where this is not possible, be mitigated to protect the integrity of the site(s). Development that would adversely affect the integrity of one or more internationally important site(s) will only be permitted where there are no alternative solutions or <b>and</b> there are imperative reasons of overriding public interest, and where suitable compensatory provision has been made. Any mitigation or compensatory provision must be assessed in a project-related Habitats Regulations Assessment and be fully functional before any likely adverse effect arises.</p> <p><u>Other protected sites, habitats and species</u></p>		
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			<p><del>2.</del> <b>3.</b> Development that would cause significant harm to a Site of Special Scientific Interest (SSSI), Local Wildlife Site, Local Nature Reserve, Local Geological Site, Priority Habitat(s), legally Protected Species and / or Priority Species, <b>without adequate mitigation</b> <del>that would not be adequately mitigated or as a last resort compensated</del>, will be refused.</p> <p><del>3.</del> <b>4.</b> Development that would be likely to cause any harm to ecological or geological interests will only be permitted in:</p> <ul style="list-style-type: none"> <li>a) Sites of Special Scientific Interest where there are no alternatives and where the benefits of the development would clearly outweigh any harm to the nature conservation value of the site and its broader contribution to the Liverpool City Region (LCR) ecological network; and</li> <li>b) Local Sites (Local Wildlife Sites, Local Nature Reserves and Local Geological Sites) and Priority Habitats: where the benefits of the development would clearly outweigh any harm to the nature conservation value of the site (or Priority Habitat) and its broader contribution to the LCR Ecological Network.</li> </ul> <p><u>Mitigation, replacement or other compensatory provision</u></p> <p><del>4.</del> <b>5.</b> Where necessary to avoid harm, appropriate mitigation, replacement or other compensatory provision will be required. The location of such</p>		
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			<p>measures will be targeted, using the following sequential approach (with (a) being the preferred approach and (d) being the least preferred):</p> <ul style="list-style-type: none"> <li>a) on the development site;</li> <li>b) locations within the immediate locality and /or supporting LCR Ecological Network;</li> <li>c) locations that fall within the LCR Nature Improvement Area and within the Borough; and lastly</li> <li>d) locations that fall within the LCR Nature Improvement Area but outside the Borough.</li> </ul> <p><b><u>This sequential approach will also apply to the delivery of Biodiversity Net Gain improvements to be delivered in line with new development, in accordance with the Environment Bill.</u></b></p> <p><u>Evidence requirements</u></p> <p><del>5. 6.</del> Development proposals that would affect a designated nature conservation site, Priority Habitat(s), legally protected species or Priority Species must be supported by an Ecological Appraisal and include details of any necessary avoidance, mitigation and / or compensation proposals, and of any proposed management measures.</p> <p><del>6. Designated sites are shown on the Policies Map and Plan policies will also apply to any other sites that may be recognised during the Plan period as being of nature conservation importance, including land provided as compensation.</del></p>		
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	102	Add new section 7	<p><b><u>“7. Further details concerning the implementation of this policy will be set out in the Council's proposed Nature Conservation Supplementary Planning Document.”</u></b></p>	For clarity.	No implications for SA findings.
	102	Reasoned Justification, paragraphs 7.6.1 – 7.6.2	<p>“7.6.1 The Liverpool City Region (LCR) authorities have identified an Ecological Network that includes a Core Biodiversity Area of designated nature and geological sites, Priority Habitats, wildlife corridors and stepping stone habitats. The LCR Nature Improvement Area (NIA) identifies opportunities for further habitat restoration, creation or enhancement, focussed within 17 Nature Improvement Focus Areas, 2 of which are located wholly or in part within St.Helens Borough. <del>The following hierarchy of sites and habitats are found within the Borough:</del></p> <ul style="list-style-type: none"> <li><del>• Functionally Linked Land (FLL) for sites of international nature importance (European Sites) including the Ribble and Alt Estuaries Special Protection Area (SPA), Martin Mere SPA, the Mersey Estuary SPA, Liverpool Bay SPA and the Manchester Mosses Special Area of Conservation;</del></li> <li><del>• Sites of national nature importance, which in St.Helens Borough include 2 Sites of Special Scientific Interest;</del></li> <li><del>• Sites of local nature and geological importance, which in St.Helens Borough include Local Nature Reserves (LNRs), Local Wildlife Sites (LWSs) and Local Geology Sites (LGSs)</del></li> <li><del>• Priority habitat and species, and legally protected species.</del></li> </ul>	For clarity.	No implications for SA findings.

			<p>7.6.2 Policy LPC06 sets out how <del>sites, habitats and species within this</del> <b>the hierarchy of sites, habitats and species</b> will be protected and managed with the objective of ensuring that there will be no net loss of the ecological resource. The policy will also guide how appropriate mitigation, replacement or other compensation measures should be identified.</p>		
	104	Reasoned Justification, paragraph 7.6.5 onwards	<p>.....</p> <p>7.6.5 It has been identified that new housing development in the <b>Liverpool City Region</b> Borough, particularly when considered cumulatively, <b>may is likely to</b> cause <b>significant</b> ecological effects on the Sefton Coast SAC and other designated European sites around the <del>Liverpool</del> City Region due to increased recreational pressure. The Council is working with other local authorities and partner organisations in the City Region to quantify these effects and to identify, <b>through the preparation of a City Region wide Recreation Mitigation Strategy</b>, a <del>strategic and</del> consistent approach to any mitigation that is required. This may include the use of developer contributions (if these are shown to be necessary to mitigate the effects of development in different parts of the City Region on the European sites). Any such contributions linked to development in St Helens Borough will be proportionate to the identified scale of its impacts. The Council will use this approach,</p>		No implications for SA findings.

		<p>subject to agreement of its details, to address this issue.</p> <p><b><u>7.6.6 The City Region Recreation Mitigation Strategy referred to in paragraph 7.6.5 above has yet to be completed. However, within St Helens any developer contributions are likely to be focussed at least in part on the delivery of strategic greenspace enhancements in the local area, for example at Bold Forest Park. The Bold Forest Park (BFP) Area Action Plan forms part of the St Helens Development Plan and provides a framework for the development of the BFP area, which covers about 1,800ha of land in the southern part of the Borough. Due to its location on the urban fringe of St Helens, the BFP is potentially accessible to a large sub-regional population and is capable of playing an important role as an alternative recreational destination. The Council will continue to promote the BFP as a sub-regional greenspace and to seek opportunities for additional funding to help improve the functionality and management of the BFP.</u></b></p> <p><u>Nationally and locally important sites and species</u></p> <p>7.6.67 Paragraphs 2-4 <b><u>3-5</u></b> of Policy LPC06 set out the requirements for development that would affect nationally and locally important sites and species, including how any benefits from such development will be weighed against its impact on nature conservation interests and the ecological network as a whole.</p> <p><b><u>7.6.8 As at October 2020, there are seven LNRs in St Helens Borough which collectively cover an area of 11.27 hectares these are listed below. Local Nature Reserves in St Helens</u></b></p>		
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			<u>LNR</u>	<u>O/S Grid Reference</u>		<u>Principle Habitats</u>		
			<u>Stanley Bank</u>	<u>SJ534,971</u>		<u>Neutral Wet grassland, Ancient Semi-Natural Woodland</u>		
			<u>Siding Lane</u>	<u>SD463,020</u>		<u>Broadleaf Woodland</u>		
			<u>Thatto Heath Meadows</u>	<u>SJ508,936</u>		<u>Neutral grassland, Stream, Hedgerows</u>		
			<u>Parr Hall Millennium Green</u>	<u>SJ527,961</u>		<u>Marshy Grassland, Wetland Reedbed, River</u>		
			<u>Colliers Moss Common (North)</u>	<u>SJ543,939</u>		<u>Lowland Heath, Raised Bog, Reedbed, Wetland, Scrub</u>		
			<u>Clinkham Wood</u>	<u>SJ515,980</u>		<u>Broadleaf Woodland</u>		
			<u>Mill Brow consisting of:</u>			<u>Wet Woodland, River,</u>		
			<u>Mill Wood</u>	<u>SJ486,955</u>		<u>Marshy Grassland, Wetland, River</u>		
			<u>Mill Brook Parish Nature Reserve</u>	<u>SJ488,957</u>				
		<p><b><u>St Helens Borough includes 116 Local Wildlife Sites. These are Listed in Appendix B of the Nature Conservation SPD.</u></b></p> <p>7.6.79 For Sites of Special Scientific Interest, significant harm includes adverse effects on the site’s notified special interest features. The advice of suitably competent persons should be sought by applicants and the decision maker in relation to this policy. The focus of significant harm and the approach regarding avoidance, mitigation, replacement or other compensatory provision to secure no net loss of biodiversity is in line with principles set out in the NPPF, Planning Practice Guidance 06/2005 Biodiversity and Geological Conservation, and Biodiversity 2020: A strategy for England’s wildlife and ecosystems services.</p> <p>7.6.8 The Council and other public bodies have a duty, under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 to conserve biodiversity when carrying out their normal functions. This duty includes Priority Habitats and Species, that are defined as “habitats and species of</p>						

			<p>principal importance” for the conservation of biodiversity in England. The Secretary of State has identified, in accordance with Section 41 of the Act, 65 Priority Habitats and 1,150 Priority Species. Priority habitats sit outside the hierarchy of designated sites and may be of national (e.g., ancient woodland) or local importance.</p> <p><del>7.6.9</del><b>10</b> The Priority Species in St.Helens ...”</p>		
	105	Reasoned Justification, new paragraph after 7.6.16 (to be renumbered 7.6.17)	<p>“7.6.16<del>7</del> .....will be set out in the Council’s Nature Conservation SPD.</p> <p><b>Monitoring</b></p> <p><b><u>7.6.18 Monitoring of Biodiversity Net Gain is likely to be undertaken in response to Government requirements outside the scope of the Local Plan. Further clarity on this is awaited at the national level.”</u></b></p>	To provide clarity on the monitoring aspect of the policy.	No implications for SA findings.
MM027	106	LPC07 New Section 3 to be added to Policy	<p><b><u>“3) The Council will support the expansion of the Greenway network, including through the provision of new routes, such as those set out in Figure 7.2, subject to the availability of funding and other feasibility requirements being met.”</u></b></p>	To improve effectiveness of Policy LPC07 by referencing new Greenways.	No implications for SA findings.
	107	Reasoned Justification, paragraph 7.9.3	<p>“7.9.3 Greenways provide a range of benefits to the community such as sustainable access between homes, local services and employment sites and a healthy form of recreation. They also provide wildlife habitat and corridors, enhance the landscape and townscape and help the Borough to adapt to the effects of climate change. <b><u>Collectively, greenways support the Council’s Climate Change Emergency declaration through providing opportunities to travel by sustainable modes.</u></b> The European Greenways Association defines greenways as ...”</p>	For clarity and linking the improvement and extension of the greenways network to climate change.	

MM028	110	<b>LPC09</b> Reasoned Justification, paragraph 7.15.1	<del>“7.15.1 The NPPF states that the planning system</del> <b><u>planning policies and decisions</u></b> should contribute to and enhance the natural and local environment by <del>protecting and enhancing valued landscapes</del> <b><u>recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital.</u></b> ”	For improved clarity.	No implications for SA findings.
MM029	112	<b>LPC10</b> Section 6	“6. Development proposals <del>should</del> <b><u>must</u></b> be designed and laid out in a manner that would <b><u>retain</u></b> <del>not damage or destroy</del> any tree subject to...”	For improved clarity and consistency with NPPF.	No implications for SA findings.
	113	Reasoned Justification, paragraph 7.18.2	“7.18.2 Trees and woodlands are an integral component of Green Infrastructure forming part of the network of natural habitats and improving the visual appearance of the countryside and urban areas. They also provide opportunities for the positive use of the Green Infrastructure for recreation, education, health, biodiversity, regeneration and mitigation of adverse effects caused by climate change, air pollution and water run-off. <b><u>Therefore, the retention of existing, and the planting of new, trees and woodland areas will support the Council’s Climate Change Emergency declaration.</u></b> Their value is recognised in the Regional Forestry Framework Woodland ....”	To recognise the importance of this policy in relation to climate change.	
MM030	116	<b>LPC11</b> New Section 3 to be added.	“3. <b><u>The impact of development proposals on the significance of heritage assets and their settings will be considered in accordance with case law, legislation and the National Planning Policy Framework.</u></b> ”	For improved consistency with the NPPF.	No implications for SA findings.

		<p><u>Development affecting heritage assets</u></p> <p><del>3.4.</del> Development proposals that would lead to substantial harm to (or total loss of significance of) a designated heritage asset will be refused permission unless it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>a) the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or total loss;</li> <li>or</li> <li>b) all the other exceptions set out in paragraph 195 of the National Planning Policy Framework (or any successor national policy that supersedes this paragraph) apply.</li> </ul> <p><del>4. Where a development would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against any public benefits of the proposal including, where appropriate, securing its optimum viable use.</del></p> <p>5. Development involving harm to or loss of any non-designated heritage asset (such as any building identified on a Local List prepared by the Council) will <b><u>only be permitted where the benefits are considered sufficient to outweigh the harm, having regard to the scale of the harm and the significance of the heritage asset.</u></b> <del>refused unless any public benefit from the development would outweigh such harm or loss.</del></p> <p><del>6. Development and other works will be required to preserve or enhance the</del></p>		
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			<p>appearance, character and setting of all heritage assets (whether designated or not) by using good design and appropriate materials, detailing, scale, massing, siting, layout and landscaping.</p> <p><del>7</del> <b>6.</b> Where the complete or partial loss of any heritage asset is justified, the asset's significance must be recorded to a standard agreed by the Council and made publicly available.</p> <p><u>Areas of archaeological interest</u></p> <p><del>8</del> <b>7.</b> Any development proposal that may affect one or more asset(s) of ...”</p> <p><i>Re-number subsequent Policy sections</i></p>		
MM031	121	<b>LPC12</b>	<p>Flood Risk</p> <p><b><u>1. The impact of development proposals on flood risk and water management assets will be considered in accordance with case law, legislation and the National Planning Policy Framework.</u></b></p> <p><del>1. Any development proposal that may either be at risk of flooding or cause a material increase in flood risk elsewhere will only be permitted if the flooding issues have been fully assessed and any identified risks would be appropriately mitigated. Any assessment and mitigation should have regard to:</del></p> <p>a) the St. Helens Strategic Flood Risk Assessment;</p> <p>b) advice and guidance from relevant bodies including the Environment Agency and Lead Local Flood Authority; and</p> <p>c) any relevant Surface Water Management Plan or local drainage strategy such as the Sankey Catchment Action Plan, Mersey Estuary Catchment</p>	No need to repeat national policy and guidance	No implications for SA findings.

		<p>Flood Management Plan or the North West River Basin Management Plan.</p> <p><del>2. All development proposals must be supported by a Flood Risk Assessment appropriate to their nature and scale where they would be:</del></p> <p><del>a) within flood zones 2 or 3; or</del></p> <p><del>b) on a site of 1 hectare or larger within flood zone 1; or</del></p> <p><del>c) on a site of 0.5 hectare or larger within a Critical Drainage Area; or</del></p> <p><del>d) in any area identified by the Council as being at intermediate or high risk of surface water flooding.</del></p> <p><del>3. New development should be located in accordance with a sequential approach as set out in national policy. Development on sites located in flood zones 2 or 3 will only be allowed if:</del></p> <p><del>a) the Sequential Test has been applied and demonstrates that the development cannot reasonably be accommodated within an area at lower risk of flooding;</del></p> <p><del>b) any applicable Exception Test required by national policy has been passed; and</del></p> <p><del>c) appropriate mitigation or adaption measures are proposed to satisfactorily reduce the likelihood or impact of flooding.</del></p> <p><b>4.2.</b> Measures to manage or mitigate flood risk associated with or caused by new development must (as appropriate having regard to its scale and nature):</p> <p>a) be designed to contribute to the biodiversity of the Borough unless it has been demonstrated that this would not be technically feasible;</p> <p>b) protect heritage assets (such as buried archaeology);</p>		
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		<p>c) be fully described in the development proposal; and  d) be funded by the developer, including long-term maintenance.</p> <p><del>5.3.</del> Any proposal for major development<sup>56</sup> on a site that would abut, run alongside or straddle any watercourse<sup>57</sup> in the Borough, must include measures to temporarily attenuate and filter flood water in order to: improve water quality; reduce peak flows during flooding; and reduce downstream flood risk, unless it has been demonstrated that this is not feasible or viable. In cases where measures are not currently feasible or viable, the development must not compromise the ability to implement such measures in the future.</p> <p><del>6.4.</del> The Flood Water Storage Safeguarding Areas as defined on the Policies Map shall be safeguarded for the provision of flood storage. Development within or adjacent to these areas that would have a negative impact on their function as a flood storage area or on their potential to be developed for flood storage infrastructure will not be permitted.</p> <p>Water Quality</p> <p><del>7.5.</del> Development that would adversely affect the quality or quantity of water in any watercourse or of groundwater or cause deterioration in water body or element classification levels defined in the Water Framework Directive (WFD) (or in any national regulations covering this matter) will not be permitted. Any planning application for development that could (without effective mitigation) cause such harm must be supported by a Construction</p>		
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			<p>Management Plan that sets out how the water environment will be protected during the construction process.</p> <p>Sustainable Drainage Systems  <del>8.6. Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.</del> <b><u>Inclusion of sustainable drainage systems within proposed major development sites will be assessed in accordance with national policy.</u></b>                  Surface water should be managed in accordance with the following hierarchy (with a) being the preferred option and d) being the least favourable option):                  a) an adequate soakaway or other form of infiltration system;                  b) an attenuated discharge to watercourse;                  c) an attenuated discharge to public surface water sewer;                  d) an attenuated discharge to public combined sewer.</p> <p><del>9.7. Surface water management infrastructure within new developments should ....”</del>  <i>Re-number subsequent policy sections accordingly.</i></p>		
MM032	128	LPC13 Section 4	<p>“4. New developments for housing, employment or other uses will be required to meet high standards of sustainable design and construction and minimise carbon emissions <b><u>equivalent to CSH level 4, ie. 19% carbon reduction against Part L 2013 unless proven unviable.</u></b> To this end they should use energy efficiently and where feasible incorporate decentralised energy</p>	<p>In response to the Written Ministerial Statement (2015) setting out the Government’s national policy in relation to setting energy standards for new dwellings. The modification ensures the Plan is fully compliant with this.</p>	<p>Greater clarity should increase likelihood that positive effects will arise with regards to climate change mitigation. The standards are</p>

			systems ....”		likely to be succeeded in the future though, so effects unlikely to be significant.
129	Reasoned Justification, paragraph 7.27.1	“7.27.1 ...The NPPF indicates that planning has a key role to play in supporting the delivery of renewable and low carbon energy by reducing greenhouse gas emissions and encouraging energy production from such sources, <b><u>and this Policy, in conjunction with a number of other Policies in this Plan, will support the Council’s Climate Change Emergency declaration.</u></b> ”		For clarity.	
129	Reasoned Justification, paragraph 7.27.5	“7.27.5 The Liverpool City Region Renewable Energy Capacity Study 2010 assessed the scope for large scale wind and other forms of renewable energy generation across the City Region. Although it identified some areas of search for wind energy development, none of these were in St.Helens Borough. <del>The Council acknowledges however that some forms of wind energy development may be acceptable within the Borough. In such cases the applicant would need to demonstrate that their development is technically feasible and acceptable taking into account factors such as wind speed, environmental and landscape designations and proximity to sensitive receptors such as residential properties and heritage assets. All</del>		To ensure policy wording aligns with national policy on wind energy development.	No implications for SA findings.

			proposals will be expected to comply with all relevant criteria set out in Policy LPC13, other policies of this Plan and national policy.”		
MM033	131	LPC14 Section 1	“1. The Council will seek to ensure that the Borough of St.Helens provides a steady and adequate supply of minerals to contribute towards <b>local</b> , regional and national needs. To minimise the ...”	For clarity.	No implications for SA findings.
		Section 4	“4. Proposals for the exploration, extraction, storage, processing and / or distribution of minerals will <b>only</b> be permitted if it has been demonstrated that...”	For clarity	No implications for SA findings.
MM034	140	LPD01 Section 1	<p>“All proposals for development will be expected, as appropriate having to their scale, location and nature, to meet or exceed the following requirements:</p> <p>1. Quality of the Built Environment</p> <p>a) Maintain or enhance the character and appearance of the local environment, <b>with a focus on the importance of local distinctiveness, as well as using good design to improve the quality of areas that may have become run down and be in need of regeneration</b>, for example with regard to the siting, layout, massing, scale, design and materials used in any building work, the building-to-plot ratio and landscaping;</p> <p>b) Avoid causing <b>unacceptable</b> harm to the amenities of the local area and surrounding residential and other land uses and occupiers;</p> <p>c) Ensure that the occupiers of new developments will enjoy a <b>high</b> an appropriate standard of amenity and will not be <b>unacceptably</b> adversely affected by neighbouring uses and vice versa;</p> <p>d) Link ...</p>	Proposed re-wording to reflect local distinctiveness and the role of good design, make the policy more effective, ensure consistency with the NPPF, and change to reflect that the effects of requiring contributions to public art on viability have not been assessed. Cross reference to Policy LPC01 to make policy more effective as it provides the specific requirements.	Ought to lead to more beneficial outcomes for the built environment by providing clarity on the need for high standards of design and amenity. Unlikely to be significant implications to the SA findings though.

			<p>g) Provide landscaping, <b>including tree-lined streets</b>, as an integral part of the development ....</p> <p>h) <b>Encourage the inclusion of</b>, <del>include or contribute</del> <b>make a contribution</b> to, the provision of public art <b>within</b> appropriate <b>schemes</b> circumstances (for example where the development would be of s substantial size and / or in a prominent gateway or town centre location);</p> <p>i) Provide for the needs of special groups in the community such as the elderly and those with disabilities <b>as identified in Policy LPC01</b>; and</p> <p>j) Protect the ...”</p>		
	143	Reasoned Justification, paragraph 8.3.10	<p>“8.3.10 .... As part of the Council’s positive strategy to promote energy from renewable and low carbon sources, new development should also, subject to the requirements of Policy LPC13, be designed to facilitate the incorporation of renewable and / or other low carbon technologies. <b><u>Taken together, this approach will support the Council’s Climate Change emergency declaration, particularly in respect of delivering energy efficient and low-carbon developments.</u></b>”</p>	For clarity to show the connections between this policy and the Council’s climate change ambitions.	No implications for SA findings.
MM035	144	<b>LPD02</b>	<p>“3. Provide appropriate landscaping, <b>including tree-lined streets</b>, using native tree and ...</p> <p><del>“6. avoid causing unjustified harm to the character or setting of any listed building(s), conservation area(s) or any other designated or non-designated heritage asset,</del> <b>ensure heritage assets are treated</b> in accordance with Policy</p>	To ensure consistency between Policy LPD02 and the other policies in the Plan, and consistency with national policy.	No implications for SA findings.

			<p><b><u>LPC11 to support the Council’s ambition to promote the conservation and enhancement of the Borough’s heritage assets and their settings in a manner appropriate to their significance;</u></b></p> <p><b><u>7. consider the Borough’s environmental assets (including, but not limited to, biodiversity and associated habitats, landscapes, trees, woodland and hedgerows) in accordance with policies LPC06, LPC08, LPC09 and LPC10</u></b> avoid causing harm to any important natural habitat, historic or other important landscape, mature tree(s), hedgerow, wildlife habitat, pond or watercourse, and where practicable incorporate positive aspects of these features into its design and layout;”</p>		
MM036	146	<b>LPD03</b> Section 1	<p>“... a) .... in the area; or b) the development would generate a need for open space that cannot be satisfactorily or fully met by existing provision in the area-; <b><u>or</u></b> <b><u>c) it is appropriate to provide certain typologies of open space as part of the design to provide accessible children’s play areas and create a visually attractive development.</u></b>”</p>	To provide clarity on when open space may need to be provided.	Likely to have further benefits with regards to townscape and landscape, but this will not significantly affect SA findings.

146	Addition of new section 3	<p>“.... b) the quantity, accessibility and quality of existing provision in the area.</p> <p><b><u>3. Provision for outdoor sports facilities will be achieved through contributions to enhance existing facilities or the provision of new facilities, which will be informed by the Council’s latest Playing Pitch Strategy and Action Plan.”</u></b></p> <p><del>3.4.</del> The required amount of open space ...”</p> <p><i>Subsequent policy paragraphs to be re-numbered.</i></p>	<p>To make policy more effective through inclusion of reference to outdoor sports facilities provision.</p>	No implications for SA findings.	
147	Reasoned Justification, paragraph 8.9.5	Reasoned Justification	<p><del>“8.9.5 The requirements of Policy LPD03 concerning open space are in addition to any requirements for outdoor sports facilities such as playing pitches. Any requirement for outdoor sports provision that arises from new residential development will be addressed separately in accordance with Policy LPA08: Infrastructure Delivery and Funding and Policy LPC05: Open Space and Outdoor Sports Facilities.”</del></p> <p><i>Make changes to the Reasoned Justification in accordance with the modifications listed in this document under MM022, associated with Policy LPC05.</i></p>	<p>Reference to outdoor sports facilities is now included in the policy, so this paragraph is no longer relevant.</p> <p>For clarity.</p>	No implications for SA findings.

			<i>Subsequent paragraphs to be re-numbered.</i>		
MM037	149	<b>LPD04</b> Criterion 2  Criterion 4	<p>“2. There would be no <b>significant</b> adverse impact on the <b>living conditions</b> amenity of any occupiers of neighbouring properties caused by overlooking, <del>loss of privacy</del> or reduction of daylight / <b>sunlight</b> to habitable rooms or garden areas;</p> <p>....</p> <p>4. ... off road parking, <b>or</b> lack of visibility <del>or impact on the safety and free flow of traffic;</del></p> <p>....”</p>	For improved clarity.	No implications for SA findings.
MM038	155	<b>LPD07</b>	<p>“All new housing and employment development should make provision for the latest generation of information and digital communication (ICT) networks to a standard that is compatible with the infrastructure available, or is likely to become available in the Plan period, in the area in which the development would be sited. <del>Subject to the requirements of Policy LPA08, contributions may also be sought from developers towards the cost of providing necessary off-site fast broadband infrastructure to serve the area.</del>”</p>	For improved clarity.	No implications for SA findings.
MM039	161	<b>LPD09</b> Reasoned Justification, Paragraph 8.27.6	<p>“8.27.6 ... All proposals for new development that could give rise to significant amounts of traffic must include information on any increase in pollution that would arise as a result of the proposals and identify mitigation measures to address such increases. <b><u>In doing so, this</u></b></p>	For clarity.	No implications for SA findings.

			<b><u>Policy will support the Council’s Climate Change Emergency declaration.”</u></b>		
		Reasoned Justification, Paragraph 8.27.7	<p>“8.27.7 The Manchester Mosses Special Area of Conservation (SAC) has been identified as being at risk of harm from increased air pollution caused by traffic. For this reason, all proposals for development that would cause an increase in traffic levels that would exceed one or both of the thresholds in paragraph 3 of Policy LPD09 must be accompanied by sufficient evidence to enable the effects upon the SAC to be assessed. <b><u>Under part 1 of Policy LPC06, smaller development proposals would also need to be accompanied by such evidence if they are likely to have a significant effect alone or in combination with other projects on the SAC. For this purpose, ‘smaller developments’ is defined as meeting the threshold for requiring a transport assessment. This is currently set out in St Helens Borough Council’s ‘Guidance Notes for the Submission of Transport Assessments’ (March 2016). However, the threshold is guidance only, and the circumstances of individual proposals will have an influence, for example, there may be site specific issues or traffic sensitive locations that require assessment, but do not fall within the threshold indicated. This will</u></b></p>	For clarity.	No implications for SA findings.

			<p><b>be determined on a site by site basis.</b> Any significant effects would need to be addressed in line with Policy LPC06.</p>		
		<p>Insert new Reasoned Justification paragraph 8.27.8</p>	<p><b><u>“8.27.8 The precise details of the measures required in response to point (3) of policy LPD09 will depend on the details of the development itself. However, effective measures available (depending on the type of development) may include:</u></b></p> <ol style="list-style-type: none"> <li><b><u>1. Electric vehicle charging points at parking spaces;</u></b></li> <li><b><u>2. Provision of a communal minibus (particularly if electric), and car club space;</u></b></li> <li><b><u>3. Cycle parking and shower facilities for staff;</u></b></li> <li><b><u>4. On-site services (e.g. GP surgeries and shops) to reduce need for off-site movements;</u></b></li> <li><b><u>5. Personalised Journey Planning services for residents. If employment premises the company could provide incentives for car-sharing and minimising car journeys for work;</u></b></li> <li><b><u>6. Production of sustainable travel information for residents e.g. accurate and easily understandable bus timetables;</u></b></li> <li><b><u>7. Implementation of a Staff Management Plan to place restrictions on car use by Staff;</u></b></li> <li><b><u>8. For vehicles generating HGV movements,</u></b></li> </ol>	<p>For clarity</p>	<p>No implications for SA findings.</p>

			<b><u>restrictions to keep movements below 200 Heavy Duty Vehicles per day, or a commitment to ensuring all HGVs used will be Euro6 compliant.”</u></b>		
MM040	162	<b>LPD10</b>	1. Proposals for food and drink uses (including restaurants, cafes, drinking establishments and the sale of hot food for consumption off the premises) <b><u>which consist of new built development or those that are not classed as permitted development for Change of Use under use Class E or are Sui Generis</u></b> will only be permitted where all of the following criteria are met: ....”	To reflect changes to the use Classes Order	No implications for SA findings.
		Reasoned Justification, paragraph 8.30.2	<del>“8.30.2 Paragraphs 1 and 2 of Policy LPD10 cover food and drink uses within Classes A3 to A5 of the Use Classes Order<sup>1</sup> i.e., restaurants and cafes, drinking establishments and hot food takeaways. Paragraphs 3 and 4 of the Policy relate solely to proposals for hot food takeaways falling within use Class A5. The policy does not apply to shops within Use Class A1 that sell food for consumption off the premises. <b><u>The Government introduced a new Use Class E on 1<sup>st</sup> September 2020<sup>2</sup> which now groups Restaurants and Cafes within Use Class E. Therefore, proposals to change within the same use class do not require Planning Permission. Paragraphs 1 and 2 of Policy LPD10 only apply to restaurant and café</u></b></del>	Consideration for the implications of the changes to the use Classes Order	No implications for SA findings.

<sup>1</sup> Town and Country Planning (Use Classes) Order 1987 (as amended)

<sup>2</sup> The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020

			<b><u>applications where a new unit is proposed or where the existing use class E cannot be demonstrated. Proposals for drinking establishments and hot food takeaways are now Sui Generis and remain unaffected. Paragraphs 3 and 4 of the Policy relate solely to proposals for hot food takeaways.</u></b>		
MM041	176	Appendix 1 Glossary	<b>“Green Infrastructure:</b> A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. It is a network of open spaces, waterways, gardens, woodlands, green corridors, <b>and</b> street trees <del>and open countryside</del> that brings many social, economic and environmental benefits to local people and communities. Some examples of these are parks, street trees, gardens, grassland, rivers and ponds.”	For clarity.	No implications for SA findings.
	183		<del><b>“Primary and secondary frontages:</b> Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.”</del>	To align with the NPPF and reflect the removal of the primary and secondary frontages from the Plan.	No implications for SA findings.
MM043	189- 190	Appendix 2 Definition of Infrastructure	<i>Delete Appendix 2</i>	Concerns that some categories listed in Appendix 2 do not comprise infrastructure, and would not be expected to be supported by developer contributions in accordance with LPA08.	No implications for SA findings.

MM043	195-215	Appendix 4 Monitoring Framework	<i>See Annex 6 for proposed modifications.</i>	For clarity and improved effectiveness.	No implications for SA findings.
MM044	218-242	Appendix 5 Site profiles Allocated Employment and Housing Sites	<i>Proposed changes to the site profiles are set out in Annex 1.</i>	<p>Requirements which are generic and apply to each site because of other policies of the Plan are removed from the site profiles, because the requirements should be site specific.</p> <p>The addition of new requirements (or removal of existing), where appropriate.</p> <p>Removal of allocations 2EA, 3EA, 10EA, 11EA and 3HA because they are now either developed or under construction, so there is no need to give them allocation status.</p> <p>For those sites that have a planning permission, but are not yet built (9EA, 9HA and 10HA), the key conditions from the decision notices are included to ensure effectiveness of Plan.</p> <p>To reflect inclusion of new Parkside West and Bold Forest Garden Suburb</p>	Screened in

				<p>Policies (LPA12 and LPA13).</p> <p>Adjustment to site boundaries for sites 9EA and 7HA.</p>	
MM045	248-259	<p>Appendix 7</p> <p>Site profiles</p> <p>Safeguarded employment and housing sites</p>	<p>Proposed changes to the site profiles are set out in Annex 2</p>	<p>Requirements which are generic and apply to each site because of other policies of the Plan are removed from the site profiles, because the requirements should be site specific.</p>	<p>Screened in</p>

				<p>The addition of new requirements (or removal of existing), where appropriate.</p> <p>Adjustment to site boundary for site 4HS.</p>	
MM046	283-284	Appendix 11 St Helens Town Centre Plan	<p><i>Update the St. Helens Town Centre Map to show the removal of the primary and secondary frontages. Please see Annex 10.</i></p>	<p>To align with the NPPF.</p> <p>For clarity.</p>	No implications for SA findings.



