



ST HELENS BOROUGH LOCAL PLAN 2020-2035

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 4: LOCAL PLAN SOUNDNESS & QUALITY ASSESSMENT

OCTOBER 2020

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 4: LOCAL PLAN SOUNDNESS & QUALITY ASSESSMENT

Why you should use this part of the toolkit

The purpose of this assessment is to provide a 'mock' examination - as far as that is possible - of the drafts of your local plan policies update. It is intended to be particularly helpful for use as part of the development of your emerging local plan policies update and as a final check prior to publication of your Regulation 19 Submission Local Plan policies update. It will help you to identify areas for improvement and understand potential risks to the soundness of the plan or its usability.

How to use this part of the toolkit

There are 50 'key questions' in the assessment matrix below which might seem a lot to get through. But thinking through these questions now could save time and expense further down the line. If you are undertaking a partial plan policies update not all of the content will be relevant to you.

If you are completing this assessment or peer reviewing it for a colleague within or from another authority, you should put yourself into the mind of a Planning Inspector assessing the soundness of the draft local plan policies update by keeping in mind the 'tests' as follows. Is the draft local plan update:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework](#).

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For some elements, particularly those concerning clarity, you will also need to consider yourself as an end user of the Local Plan policies update.

Provide a brief answer to each question cross referring to evidence that has informed or supports the local plan policies update in order to justify your reasoning and the score you have attributed. Identify any likely implications of not changing your approach or ways in which you may potentially improve the score either through changes to the plan policies update, evidence or further engagement with developers or infrastructure providers recorded in your statement of common ground. But remember that the local plan policies update doesn't need to be supported by reams of evidence. Evidence needs to be proportionate, clear and robust in line with [PAS advice on proportionate evidence](#).

If you find it helpful, you can score your local plan policies update on the degree to which you meet requirements underpinning the question. You can then add up the scores to calculate your confidence in the local plan policies update (on a scale from -100 to +100) and use this as a benchmark for future improvements. Where a particular question is not applicable to your circumstances, please score +2.

How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to assess the extent to which your plan addresses key soundness requirements. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find the assessment (or some elements) helpful to inform changes to your plan or supporting documents.

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	KEY QUESTIONS	<p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
Growth Strategy		
A	<p>In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area</p>	<p>The Council’s strategy for delivering growth and development has been to provide for the levels of growth in both employment and housing that are realistic, deliverable and therefore achievable within the Plan period. When setting the housing and employment land requirements, the Council have sought to provide a balance between ensuring the local plan delivers enough development land to meet the Borough’s needs in full and protecting the Green Belt.</p> <p>The Plan seeks to deliver sustainable regeneration and growth in the key settlements, namely St Helens Core Area, Blackbrook and Haydock, Newton-le-Willows and Earlestown, Rainford, Garswood and Rainhill. The Council intends to work pro-actively with partner organisations where necessary to secure the suitable regeneration of town, district and local centres and of existing housing and employment areas, particularly in less affluent areas.</p>
B	<p>In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update</p>	<p>Key factors informing the distribution of development include:</p> <ul style="list-style-type: none"> • The aim to identify land in sustainable locations, generally within, on the edge of, or close to Key Settlements (insofar as this is acceptable and practicable). Taking account of environmental and infrastructure constraints; the need to maintain an effective Green Belt; settlement size; projected future population growth; past rates of housing delivery in relation to settlement size; and the availability of services and facilities. • The desire to maximise re-use of previously developed land; • A thorough review of the Green Belt; • Infrastructure assessments including a Transport Impact Assessment; • The findings of the SEA and HRA; • The location of key transport corridors. <p>New employment development within use classes B1, B2 and B8 will be primarily focussed on large previously undeveloped sites in close proximity to the M6 and M62 in order to meet modern requirements and market demand.</p>

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		<p>The housing land supply will be distributed across the Borough, albeit with a concentration in existing urban areas and the major urban extension planned at Bold.</p>
C	<p>List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery</p>	<p>Policy LPA08 relates to infrastructure delivery and funding; it links closely to the content of the St Helens Infrastructure Delivery Plan (December 2020), which sets out the level of new or improved infrastructure that will be required to deliver the growth proposed in the Plan and aims to identify the costs, delivery agents and means of funding.</p> <p>Further requirements for the proposed allocated sites are also listed in Appendix 5 of the Plan.</p> <p><u>Employment Strategic Sites:</u></p> <p>1EA: Omega South Western Extension, Land north of Finches Plantation, Bold – Appropriate highway access via the existing Omega South development. Measures to secure access to the site by walking, cycling and public transport from residential areas in St Helens and Warrington.</p> <p>2EA: Land at Florida Farm North, Slag Lane, Haydock – Key highway infrastructure improvements have been delivered and the site is now fully operational.</p> <p>6EA: Land west of Millfield Lane, south of Liverpool Road and north of Clipsley Brook, Haydock – Appropriate highway access via Millfield Lane and allocated 2EA site. Any mitigation measures required to limit impacts on the M6 (junction 23) or other parts of the highway network. Provision of effective flood management measures.</p> <p>7EA: Parkside East, Newton-le-Willows – This site has its own specific policy, Policy LPA10. The delivery of rail infrastructure to connect a SRFI to the rail network will be required. Local highway improvements and improvements to M6 junction 22 could be required.</p> <p>8EA: Parkside West, Newton-le-Willows – Provision of a new link road, linking to Junction 22 of the M6 (needed for a second phase of development). Suitable measures to control the impact of increased traffic movement or uses within the site on residential amenity, noise and /or air quality in the surrounding area.</p> <p><u>Housing Strategic Sites:</u></p>

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		<p>2HA: Land at Florida Farm (South of A580), Slag Lane, Blackbrook – Highway access from the A580. Any mitigation measures required to limit impacts on the M6 (junction 23) or other parts of the highway network. Provision of effective flood management measures. Potential education contributions, provision of open space.</p> <p>3HA: Former Penlake Industrial Estate, Reginald Road, Bold – This site is currently under construction in line with planning consent P/2015/0130.</p> <p>4HA: Land bounded by Reginald Road / Bold Road / Travers Entry / Gorse Lane / Crawford Street, Bold (Bold Forest Garden Suburb) – Key infrastructure will include the provision of a primary school on site. Highway infrastructure not only on the Local Road Network but also potential impacts on Junction 8 of the M62. Development needs to be consistent with the adopted Bold Forest Park Area Action Plan. Well landscaped setting including extensive green links through and around the site and promote tree planting.</p> <p>5HA: Land South of Gartons Lane and former St. Theresa’s Social Club, Gartons Lane, Bold – Appropriate highway access, developer will be expected to fund the provision of a suitable access road to the car park area in the adjacent Bold Forest Park as well as utility service connections. Financial contributions for education and off-site highway works.</p> <p>6HA: Land at Cowley Street, Cowley Hill, Town Centre - Appropriate highway access should be provided from City Road and College Street (with any necessary off-site improvements).</p> <p>9HA: Former Linkway Distribution Park, Elton Head Road, Thatto Heath - Key site requirements are addressed in the approved plans and conditions attached to planning permission reference P/2018/0060/FUL, granted on 20 June 2018.</p> <p>10HA: Moss Nook Urban Village, Watery Lane, Moss Nook – Appropriate highway access and off-site highway works to be undertaken.</p>				
1.	<p>Overall does the local plan policies update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is ‘an appropriate strategy’ within the context of paragraph 35 of the NPPF?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2 Yes, the strategic policies contained in Chapter 4 of the Plan clearly set out and articulate where and how the proposed development for the Borough will be delivered. These are considered appropriate strategies in the context of paragraph 35 of the NPPF.</p>				

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		The SA/SEA identifies the reasonable alternatives and why they have not been selected, both in terms of the SHBLP as a whole and the individual policies within it.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		<p>Reviewer Comments: Given the context of paragraph 35 of the NPPF the SHBLP is positively prepared seeking development targets that meet the Borough’s objectively assessed needs, informed through a detailed and appropriate level of evidence that is consistent with national guidance. The preparation of the SHBLP has allowed many opportunities for alternatives to be presented and considered, and in discussion with neighbouring authorities and through the preparation of proportionate evidence an appropriate strategy has been presented for future development in St Helens.</p> <p>The strategic sites will require a masterplan as part of any planning application in line with Policies LPA04.1: Strategic Employment Sites and LPA05.1: Strategic Housing Sites.</p>				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
2.	<p>Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?</p>	<p>Reason for score: +2</p> <p>The SHBLP sets out the site allocations, which are considered to have the potential to make a significant positive contribution to the Borough’s housing and employment needs and are likely to come forward for development within the Plan period. The site allocations have been informed using a number of background evidence documents which collectively assess the deliverability of the proposed development sites including:</p> <ul style="list-style-type: none"> • Green Belt Review 2018; • Strategic Housing Land Availability Assessment 2017; • Transport Impact Assessment (2019); • Infrastructure Delivery Plan 2020; and • Economic Viability Assessment 2018. 				

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		The housing, employment and Parkside background papers and the Bold Garden Suburb Position Statement set out how the deliverability of strategic site allocations have been determined.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		Reviewer Comments: There is a detailed evidence base informing the identification of the strategic sites and their deliverability.				
3.	<p>Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower?</p> <p>If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence?</p> <p>Does the level of housing provide for an appropriate and justified buffer?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2</p> <p>The proposed housing target has changed throughout the process of Plan preparation. When Plan preparation commenced in 2016 it was estimated that as a minimum around 451 new homes per year would be required. At the Preferred Options stage the Council's preferred option was 570 new homes per year, this was considered necessary to deliver the proposed employment land allocations, but this has subsequently decreased to 486 dwellings per year. This is mostly due to a reduction in the amount of employment land proposed to be allocated in the Local Plan, but it is also due to methodological changes to the way that housing requirements are required to be calculated through the standard method, rather than any significant changes in the underlying demand and need for new homes in the Borough.</p> <p>The SHMA assessed different scenarios to identify the level of housing likely to be required to support the employment sites proposed to be allocated within the Plan. Having regard to this evidence, the Council consider Option 3 Scenario 2, which results in an annual housing need of 486 dwellings to be the most appropriate basis for the Local Plan housing requirement, as this reflects the final proposed allocation of employment sites. Local Plan Policy LPA05: 'Meeting St. Helens Housing Needs' therefore identifies a minimum average housing need figure of 486 net dwelling completions per year (between 2016 and 2035). This equates to a total of 9,234 dwellings within this period.</p>				

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		<p>While the proposed housing target is higher than the current standard need figure of 434 dwellings per annum, it is considered that the 486 dwellings per year requirement represents a sound requirement as it addresses housing needs in full and supports economic growth ambitions.</p> <p>In relation to local authorities who do not use the standard method, the PPG suggests that where a higher need is identified than the standard method and where it adequately reflects current and future demographic trends and market signals “the approach can be considered sound as it will have exceeded the minimum starting point.” (paragraph 15).</p> <p>A 20% buffer has been applied to the Green Belt allocations in the Plan and a 15% discount for non-delivery of the urban housing land supply has been applied; this will help ensure that the Plan meets objectively assessed needs, with sufficient flexibility to adapt to rapid change as required by the NPPF.</p>				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		<p>Reviewer Comments: As part of submission the Council has prepared a Housing Background Paper. Its sets out the background and approach taken to the housing policies in the SHBLP; and provides an update on the Council’s housing land supply position. The paper does not repeat all the evidence that the Council has relied upon when preparing the SHBLP. This evidence has been separately published and is available on the Council’s website.</p>				
4.	<p>Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have been fully considered? Can you demonstrate that exceptional circumstances exist to justify green belt release?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2 The SHBLP is accompanied by a comprehensive Green Belt Review (2018). A significant proportion of the Borough’s land is in the Green Belt (65.2%), comprising almost all the open undeveloped land not within the urban areas.</p>				

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		<p>The Green Belt Review 2018 and the Developing the Strategy Background Paper outline the exceptional circumstances justifying Green Belt release.</p> <p>Alternative options to Green Belt release were consulted on at the Scoping and Preferred Options stages, and the SA has assessed reasonable alternatives throughout the plan making process.</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: No action required</p>				
		<p>Reviewer Comments: The Council has identified that there is a shortfall of suitable land within its existing urban areas to meet both the housing and employment needs of the Borough throughout the Plan period. No neighbouring authority has been identified that can demonstrably help meet this need.</p> <p>The Green Belt Review (2018) has identified areas where development could be accommodated whilst causing least harm to the purposes of the Green Belt.</p> <p>The SHLAA 2017, the Employment Land Needs Study 2015 (and Addendum Study 2019) and St. Helens Allocations Local Plan Evidence Base Paper September 2015 set out the shortage of available urban land to meet housing and employment land needs.</p>				
5.	<p>Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2 It is clear through the various stages of the local Plan process and stages of public consultation (Scoping, Preferred Options and various Call for Sites consultations) that a thorough search of sites has been undertaken and the deliverability of these sites have been examined by the appropriate assessments</p> <p>Sites identified within the SHBLP have been selected through various means.</p>				

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		<p>The SHLAA (2017) was produced following a comprehensive and rigorous Call for Sites process. The 2017 SHLAA also assessed and reviewed all conclusions previously reached for sites already contained in the previous SHLAA's. It provides a robust understanding of the Borough's housing capacity under current planning policy conditions.</p> <p>All sites allocated (housing and employment) (and those that were considered reasonable alternatives but where rejected) have gone through the Sustainable Appraisal (Ref: SD005) process, which assessed them against a range of criteria.</p> <p>All proposed allocations on Green Belt land have been assessed consistently through the Green Belt Review 2018.</p> <p>All allocated housing sites have been evaluated through the Economic Viability Assessment.</p> <p>The Employment Land Needs and Supply Background Paper sets out how the employment allocations have been selected.</p>				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		<p>Reviewer Comments: The Plan preparation of sites for allocation has been rigorous and robust. There have been multiple opportunities for individuals to present sites for consideration in the SHBLP and the process to determine those sites has followed a clear and transparent process drawing upon supporting evidence where necessary to justify the sites selected.</p>				
6.	Does the local plan policies update identify a housing requirement for designated neighbourhood areas?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2				

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		<p>To date there has been very limited interest in Neighbourhood Planning within the Borough, with no applications received from any Parish or Town Council, and Neighbourhood Forum (or any other qualifying body) to make one.</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: No action required</p>				
		<p>Reviewer Comments: Paragraph 65 of the NPPF only requires policy making authorities to set out a housing requirement for designated neighbourhood areas, which have none of.</p>				
7.	<p>Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +1 Appendix 5 of the SHBLP sets out the requirements for each allocated site (both housing and employment). These requirements include necessary infrastructure required for that particular development. Policy LPA04 'A Strong and Sustainable Economy' and Table 4.1 – set out details of appropriate uses and indicative site sizes for the allocated employment sites. Along with how these sites would be protected from different uses not listed in Table 4.1. Policy LPA04.1 'Strategic Employment Sites', sets out details of masterplans that would be required as part of any planning application for the allocated strategic employment sites.</p> <p>Policy LPA05 'Meeting St.Helens Borough's Housing Needs' and Table 4.5, set out the requirements for new housing development, including site sizes, indicative yield and density and net developable areas. With Policy LPA05.1 'Strategic Housing Sites' setting out the requirements for masterplanning for all strategic housing sites.</p> <p>Appendix 7 sets out the site profiles for safeguarded land and lists the requirements should these sites be brought forward for development.</p> <p>The Council has also produced an Infrastructure Delivery Plan (Ref: SD013) which is a living document and sets out what level of new or improved infrastructure will be required to deliver the growth proposed in the SHBLP.</p>				

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		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: More detailed masterplanning for site 4HA				
		<p>Reviewer Comments: The allocations vary in scale and delivery. For the strategic sites it is expected that comprehensive masterplans will be produced, predominantly led by the developer but addressing the indicative requirements set out in Appendix 5.</p>				
D	<p>What targets have you set for non-residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period?</p> <p>List these targets and the evidence source for this 'need' target?</p>	<p>Policy LPA04: 'A strong and sustainable economy' identifies that at least 215.4 hectares of land should be developed for employment uses in St Helens between 2018 and 2035. This is based on evidence including the St Helens Employment Land Needs Assessment update 2018 and development completions data. The proposed approach will also help meet employment land needs across the City Region and West Lancashire as a whole, as identified in the draft Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA) 2017. The Local Plan does not set a specific employment floorspace or jobs target. The evidence base for the employment land requirement is set out in the Employment Land Needs Study 2016 and Addendum Report 2019. The Employment Land Needs and Supply Background Paper sets out how the employment needs target has been derived.</p> <p>The Plan does not set a specific retail floorspace target but the reasoned justification to Policy LPB01: St.Helens Town Centre and Central Spatial Area, does state that the Retail and Leisure Study 2017 based on an assessment of the expected levels of population and expenditure growth, identifies a requirement for additional comparison goods floorspace across the Borough from 2023 onwards. This will correspond to an approximate need for between 3,000m2 and 6,200m2 of new floorspace by 2028 rising to between 9,200m2 and 21,200m2 by 2033. To meet this need and address the weakening of the town centre's comparison goods market share in recent years, the Council will continue to pursue 'town centre first' principles in line with national policy and seek to accommodate as much of this additional floorspace within St Helens Town Centre as possible.</p>				
	8.	<p>Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are</p>	-2	-1	0	+1
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

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	achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be met?	Reason for score: +2 The targets are based on evidence that is both effective and justified. A range of sites have been allocated to deliver the non-residential floorspace that has been identified. There has been strong developer interest in the sites allocated.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		Reviewer Comments: The non-residential floorspace that has been identified is primarily for B2 and B8 use with no retail and leisure uses being allocated. The Employment Land Needs and Supply Background Paper sets out how the deliverability of the employment land allocations have been assessed.				
9.	Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2 Yes, the Council have produced an Infrastructure Delivery Plan (IDP) (Ref: SD013). The IDP identifies the costs, delivery agents and means of funding for the infrastructure required to support growth proposed in the SHBLP. It focusses on the ways in which infrastructure providers plan to meet the changing demands on their networks and the ways St Helens Council will assist this process, including its supportive policy framework and requirements that seek to manage future demands. It also identifies commitments and proposals in this regard. Local Plan Policy LPA08 'Infrastructure Delivery and Funding', relates to planning obligations and provides the mechanism for the delivery of infrastructure. Policies LPA04.1 'Strategic Employment Sites' and LPA05.1 'Strategic Housing Sites' both require detailed comprehensive masterplanning and the site requirements for each strategic employment and housing site.				

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		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		<p>Reviewer Comments: In addition to the IDP, Appendix 5 of the SHBLP, sets out the requirements for allocated sites (for both housing and employment development).</p>				
10.	<p>Can you demonstrate that the transport and other infrastructure needed to support <u>each</u> growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated?</p> <p>Have you identified the extent of any funding gap? If so, are you able to explain why you are confident that any gap can be addressed?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2 Through the Council's various work and production of a number of supporting documents including Transport Impact Assessment (January 2019) and IDP, the M6 junction 23 study and the Bold Forest Garden Suburb Transport Review (August 2019). The Council are confident that there are no significant delivery constraints and that funding will be provided either by the developer, or a combination of public and private sector funding, for example, £2million public funding has already been secured to enable a link road to be constructed at site 10HA (Moss Nook), and public funding has also been secured to help construct the Parkside Link Road (ref: 8EA).</p>				
		Implications of taking no further action: Potential delay to the delivery of some sites.				
		Mitigation / Action required (if necessary) to move scale to right: Continue to work with site promoters and relevant partners such as Highway England and the LCR Combined Authority to deliver the necessary schemes.				
		<p>Reviewer Comments: The approach taken by the Council in terms of infrastructure funding is pragmatic and reflects the reality for public sector projects.</p>				
		Process and Outcomes (see also Toolkit Parts 2 and 3)				

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	KEY QUESTIONS	<p style="text-align: center;">Assessment</p> <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
E	<p>What are the cross boundary strategic matters affecting your local plan policies update? List these.</p>	<p>The Duty to Cooperate Statement (Ref: SDXX) sets out in Figure 3 what the strategic matters for St Helens and relationship with the NPPF strategic matters. These include:</p> <ul style="list-style-type: none"> • The level and type of proposed housing development in St Helens relative to nearby authorities within and outside the Liverpool City Region (LCR); • The proposed level of gypsy and traveller accommodation in St Helens relative to other areas; • The amount and type of land needed for employment development in St Helens relative to nearby authorities within and outside the LCR; • The review of Green Belt boundaries to meet development needs; • Cross boundary impacts from specific sites identified for future housing or employment development; • The proposed role of St Helens town centre (and of other centres in the Borough) relative to centres in nearby authorities within and outside the LCR; • The effect of the SHBLP on transport infrastructure in nearby authorities within and outside the LCR; • The proposed strategy for managing flood risk within the Sankey Valley catchment area; • The effect of the SHBLP on utilities infrastructure (e.g., digital communications, water supply and wastewater management) in nearby authorities within and outside the LCR; • The effect of the SHBLP on the low carbon infrastructure potential of the LCR and wider area; • The proposed approach to dealing with waste management issues; • The safeguarding and supply of minerals resources; • The effect of the SHBLP on community facilities (such as health, education and cultural infrastructure) in nearby authorities within and outside the LCR; • The effect of the SHBLP on green infrastructure in nearby authorities within and outside the LCR; and • The effect of the SHBLP on the built and historic environment in nearby authorities within and outside the LCR. <p>The Council have entered into two Statement of Common Grounds (SoCG). The first is with the Liverpool City Region (LCR) (Ref: SD010) in regard to strategic policy-making authorities, and part of the evidence required by local planning authorities to demonstrate compliance with the Duty to Cooperate. This statement covers a wide range of spatial planning matters, including housing delivery, employment land, the Green Belt, transport planning, digital inclusion, health and wellbeing, and environmental and green infrastructure.</p>

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		Assessment				
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		The second SoCG (Ref: SD012) is with St Helens Council and Warrington Borough Council. This SoCG sets out how Employment Site 1EA will contribute to meeting Warrington's employment needs.				
11.	Does your Duty to Cooperate Statement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2				
		The Duty to Cooperate Statement (Ref: SD009) and both SoCGs (Ref: SD010 & SD012) clearly address each of the cross boundary strategic matters. The Duty to Cooperate Statement clearly sets out the relevant bodies with which cooperation has been carried out, with regard to the fact that the legislation requires cooperation to strategic matters where there would be a significant impact.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		Reviewer Comments: The Council has actively engaged with neighbouring planning authorities and stakeholders on an on-going basis, which is clearly set out in the above documents.				
F	Are there any aspects of the local plan policies update not in conformity with national policy? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence?	There are no aspects of the SHBLP that are not in conformity within the NPPF.				

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	<i>For instance, are you seeking to require affordable housing on sites which are below the threshold of major development as defined by national planning policy?</i>					
12.	<p>Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan, or a plan produced by a Combined Authority or through voluntary agreement).</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2				
		There are no policies within the SHBLP that conflict with national or neighbouring local authority's policies. The LCR Spatial Development Strategy is still in draft form and has yet to be adopted.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: There are no policies within the SHBLP that conflict with national or neighbouring local authority's policies.				
13.	<p>Is the local plan policies update:</p> <ul style="list-style-type: none"> • in conformity with any 'higher level' plans prepared by the Council; and • properly reflecting provisions of any made neighbourhood plan? 	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2				
		The SHBLP will supersede any 'higher level' plans prepared by the Council, namely the St. Helens Local Plan Core Strategy 2012 and previously 'saved' policies of the St. Helens Unitary Development Plan 1998. No parts of these documents will remain fully in place beyond adoption of the SHBLP.				
		The SHBLP is also in complete conformity with the St. Helens Council Plan 2017-2020 Corporate Plan, which sets out the key aims and objectives for the residents and communities of St Helens. It can be found via the following webpage link https://www.sthelens.gov.uk/media/7627/sthelens-council-plan-2017_20.pdf				

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		<p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) to move scale to right: No action required</p> <p>Reviewer Comments: No Neighbourhood Plans have been 'made'.</p>				
14.	<p>Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement to date [you should revisit and update this following the publication of your Regulation 19 local plan policies update]?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2 The Statement of Community Involvement (Ref: SD015) has been produced in accordance with TCP regulations and is compliant with them. At various stages of its production, the SHBLP has gone beyond the requirements as outlined within the SCI.</p>				
		<p>Implications of taking no further action: None</p> <p>Mitigation / Action required (if necessary) to move scale to right: No action required</p> <p>Reviewer Comments: A comprehensive Consultation Statement has been prepared that demonstrates compliance with the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement.</p> <p>The Regulation 22 Consultation Statement (Ref: SD004) introductory chapters explain that the statutory requirements are understood, and it is considered that the document clearly sets out the consultation methods and response to representations at each stage of Plan preparation.</p>				
15.	<p>Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2</p>				

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		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
	alternatives? Is it clear why alternatives have not been selected?	A Sustainability Appraisal has been carried out by independent consultants, AECOM, and has been updated at every stage of the development of the SHBLP document which has evaluated all reasonable alternatives and provides clear reasoning why alternatives have not been selected.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		Reviewer Comments: The SA Report is clear that reasonable alternatives were considered for the spatial strategy (housing and employment growth and distribution); alternative site options for housing and employment; and consideration of other policy options. Commentary is provided on reasons alternatives have been considered; why alternatives have been considered and which are considered to be reasonable; and an explanation is provided as to why the preferred approach has been selected and why others have been rejected. A number of policy options were considered predominantly procedural in nature and as such, where not sufficiently discrete or precisely defined to allow for a meaningful appraisal in the SA, and so not treated as 'reasonable alternatives' and therefore not subject to a detailed appraisal.				
16.	Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2				
		The SA Report (Ref: SD005) and addendum (Ref: SD005.4) fully covers and is clear on these matters.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
Reviewer Comments: The SA Report sets out the assessments for policies, sites and the spatial strategy. It uses a SA framework that was						

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		<p>developed as part of a scoping process. The Scoping Report was prepared and published for consultation in January 2016. Following consideration of the comments received, the scope of the SA has been determined and has provided the baseline position against which appraisals have been undertaken, including 18 key issues and 20 SA objectives.</p> <p>Commentary throughout the SA addresses the likely significant effects of the proposed policies and proposals.</p>				
17.	Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2 The SA comprehensively demonstrates how policies and proposed site allocations have been assessed, and how this has influenced which policies have been amended or changed for the final document. This has been an iterative process, which has been followed throughout the Plan's process.</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: No action required</p>				
		<p>Reviewer Comments: Chapter 8 sets out mitigation and enhancement proposals, which too have been considered at different stages. It contains SA recommendations, comments by the Council and implications for the SA findings.</p>				
18.	Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +1 Corporately the Council complete Community Impact Assessment's (CIA). These ensure that the Council gives due regard to the General Duty of the Equality Act 2010 within its policies and functions to the needs of people and protected characteristics and other priority groups. A CIA was produced at Preferred Options stage in November</p>				

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		<p>2016. A further CIA was produced in November 2018 to assess the Local Plan Submission Document. However, neither document contains significant detail.</p> <p>It is considered that the SEA encompasses a lot of what an Equalities Impact Assessment contains, and in more detail.</p>				
		<p>Implications of taking no further action: Questions arise at EIP</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: No action required</p>				
		<p>Reviewer Comments: Whilst both Community Impact Assessments are not detailed in their approach, they both consider the impact of the Local Plan's draft policies and proposals upon those groups with protected characteristics. The overall impact was found to be positive and thus no direct action in amending the Local Plan was noted.</p>				
19.	Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2 Yes, the HRA considers the SHBLP policies and plans in-combination with other plans and projects, such as Local Plans of the other local authorities in the Liverpool City Region. Chapter 6 addresses this issue.</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: No action required</p>				
		<p>Reviewer Comments: The HRA update was independently prepared and published by AECOM in December 2018 and updated in October 2020. It is clear that it has considered the in-combination effects with a suite of principal plans and projects relating to development, economic growth and environmental management within the regional area and beyond.</p>				
		-2	-1	0	+1	+2

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20.	If the Habitats Regulations Assessment has identified, through 'Appropriate Assessment' that mitigation measures are required, does the local plan policies update adequately identify the measures required and the mechanisms for delivering them?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2 Due to the distances separating St Helens from the closest European sites it is considered that adverse effects on integrity will not arise from the development set out in the SHBLP when considered on its own. An adverse effect from the SHBLP alone could arise with regard to potential loss of functionally-linked habitat for birds (particularly pink-footed goose but also other species) associated with the coastal European sites (Mersey Estuary SPA and Mersey Estuary Ramsar site, Ribble & Alt Estuaries SPA/Ramsar, Mersey Narrows & North Wirral Foreshore SPA/Ramsar) and Martin Mere SPA. However, the plan contains a protective policy framework to ensure this will not arise, in addition to a commitment to produce an updated Biodiversity SPD.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		Reviewer Comments: As above.				
21.	Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2 The HRA concluded that the SHBLP contains a sufficient policy framework to ensure that no adverse effects on the integrity of any European sites arise, either from the Plan alone, or from the Plan in combination with other plans and projects.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
Reviewer Comments:						

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		The HRA is quite clear and covers these matters.				
Housing Strategy						
22.	<p>Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved as a minimum? If not [for instance, because another local authority has agreed to plan for your unmet need], can you explain and robustly justify why?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2 The Housing Need and Supply Background Paper (SD025) provides an indicate housing trajectory demonstrates that the full housing requirement can be met for the period 2020-2035. The trajectory assumes an adoption date of 01/12/2021. The trajectory indicates that based on the Council’s housing supply data at 31/03/2020, there will be a supply of 8,112 units over the Plan period. The housing trajectory is considered realistic and is based on sensible judgements being made about lead in times and build rates, thus will help ensure that housing supply is maintained throughout the Plan period. Within the Plan period housing supply there is a good mix of types and size of site.</p>				
		<p>Implications of taking no further action for local plan soundness and/or effectiveness: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: No action required</p>				
<p>Reviewer Comments: The housing number also includes a 20% buffer on proposed Green Belt allocations, in order to provide flexibility in the housing supply to allow for potential delays in development, for example to allow for the provision of essential infrastructure and other issues that may affect supply. An allowance of 15% (437 dwellings) has been made for reduced delivery on the SHLAA sites (including non-Green Belt site allocations 3HA, 6HA, 9HA and 10HA) over the later years of the Plan period (6-15 years).</p>						
G	<p>Is there any unmet need in neighbouring areas that you have been formally asked to accommodate? If yes, then list the amount by each local authority area.</p>	<p>None of the neighbouring districts have identified a need for St Helens Borough to accommodate any of their housing development needs. Neither has any spare capacity been identified in any neighbouring local authority areas to accommodate any of the housing needs arising in the Borough of St Helens.</p>				

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		All of the immediately neighbouring districts to St Helens Borough have (due to restrictions on the supply of land in their existing urban areas) recently undertaken or are in the process of undertaking Green Belt reviews to meet their development needs.				
23.	Does your local plan policies update accommodate any of this unmet need where you can sustainably do so?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2				
		No – in the Liverpool City Region Statement of Common Ground, the local authorities have agreed that there is no unmet housing need to be redistributed among or beyond the seven local authorities during current local plan periods.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
Reviewer Comments: N/A						
24.	Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period? Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2				
		The Housing Need and Supply Background Paper (SD025) demonstrates a 5-year supply position at 31/03/2020 (this is illustrated in Appendix 2). The trajectory illustrates a steady delivery rate early in the Plan period which rises to a high build out in mid-years of the Plan period when the Green Belt site allocations start to deliver significant completions. The delivery rate then levels out and tails off towards the end of the Plan period when the 'Other Supply' sites (SHLAA sites) are all delivered, demonstrating that the Plan can ensure and maintain a 5-year supply during the Plan period.				

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		<p>The build out rate assumptions utilised in the trajectory are slightly lower than what some developers have indicated they expect to deliver on the allocated sites (for example on site 2HA, 4HA and 8HA). The Council have taken a slightly cautious approach to assumed build out rates, given the current market uncertainty surrounding the economic impact of COVID19, the supporting infrastructure required to deliver many of the sites and the fact that quite a lot of large former Green Belt sites will be coming to the market at the same time.</p> <p>Housing delivery will be monitored annually to ensure that there is a deliverable 5-year supply and there is a requirement for a Local Plan review after 5 years. Such mechanisms will allow the Council to identify any potential problems with housing delivery well before the end of the Plan period.</p>				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		<p>Reviewer Comments: A Housing Need and Supply Background Paper (Ref: SD025) has been produced and submitted along with the SHBLP. Both the Housing Background Paper and SHBLP clearly show the strategy for delivery and implementation, which is clearly articulated and supports the trajectory.</p>				
25.	<p>Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption; and (ii) that beyond this 5 year period sites are developable and (iii) if relevant, you have included a 5 or 20 percent buffer to deal with under-delivery.</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2</p> <ul style="list-style-type: none"> (i) Appendix 2 of the Housing Need and Supply Background Paper (Ref: SD025), clearly sets out the 5-year supply position. (ii) Policy LPA05 sets out how housing delivery will be monitored annually to ensure that there is a deliverable 5 year supply and there is a requirement for a Local Plan to be reviewed after 5 years. (iii) The Council have included a 5% buffer to the 5 years housing requirements. We do not currently have any under-delivery. 				
		Implications of taking no further action: None				

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		<p>Mitigation / Action required (if necessary) to move scale to right: No action required</p> <p>Reviewer Comments: The Council has sought to provide a buffer so that it does not fall foul of the housing delivery test.</p>				
26.	Does the level of supply provide any ‘head room’ (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2 In order to ensure that the 9,234 net housing requirement is met in full, the SHBLP applies a SHLAA capacity reduction (including non-Green Belt Local Plan allocation sites 3HA, 6HA, 9HA and 10HA) for non-delivery of 15% for years 6-15 (437 dwellings) and a 20% buffer to the Green Belt allocations (186 dwellings) to allow for contingencies e.g. infrastructure provision, delays, lead-in times etc.. It is considered that the additional ‘buffer’ of housing land will allow for the Council to react quickly to any unforeseen changes in circumstances. These buffers also allows for a potentially higher future requirements based on any future update of the Government’s standard method for calculating housing need and meet the NPPF requirement (paragraph 14) and the presumption in favour of sustainable development.</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: No action required</p> <p>Reviewer Comments: As stated previously housing delivery will be monitored annually to ensure that there is a deliverable 5 year supply and there is a requirement for a Local Plan review after 5 years. Such mechanisms will allow the Council to identify any potential problems with housing delivery well before the end of the Plan period.</p>				
27.	Is the Council reliant on the delivery of any ‘windfall’ sites (sites not specifically identified in the development plan) during the plan period and if so, how many and	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2</p>				

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KEY QUESTIONS		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
	when? Is there compelling evidence to confirm that such sites will continue to come forward?	Yes, the Council is reliant on the delivery of 'windfall' sites. The 2017 SHLAA identifies a small sites windfall allowance of 93 units per annum. A sense check of the small sites allowance has been carried out and shows a small sites provision averaging 103 units per annum over the past 10 years and 21% of all housing delivery in the Borough.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		<p>Reviewer Comments: The 2017 SHLAA identifies that St Helens has a strong record of delivering a substantial number of dwellings on sites below the threshold of 0.25ha, this delivery has taken place under varying economic conditions and does not follow a trend. Therefore, it is considered reasonable that small sites will continue to be delivered in the Borough throughout the Local Plan period.</p>				
28.	Does the local plan policies update make it clear what size, type and tenure of housing is required?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2 Yes, these requirements are set out through overarching policies: LPC01 'Housing Mix', LPC02 'Affordable Housing' and LPC03 'Gypsies, Travellers and Travelling Showpeople'.</p>				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		<p>Reviewer Comments: The Council has sought to address these needs as best as it can, recognising that in some cases the mechanisms for delivery are subject to change/limited certainty, such as older peoples or specialised housing, or are at an early stage in their development, e.g. build to rent. The Plan seeks to provide opportunities to meet the housing needs of groups identified above where possible, but in some cases allows flexibility to not deliver where this would otherwise slow down delivery or render a development unviable.</p>				
		-2	-1	0	+1	+2

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29.	Does the local plan policies update specifically address the needs of different groups in the community?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2 A range of policies for housing delivery are specifically targeted at meeting the needs of particular groups and addresses a range of issues regarding type, size and building standards that seeks to guide housing delivery to respond to the needs of households in St Helens including the elderly, families and the disabled.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		Reviewer Comments: Policy LPC01 'Housing Mix' addresses a range of issues including the provision of accessible and adaptable to Part M4(2) standards of 20% for sites that would deliver 25 or more units, and at least 5% of new dwellings over 25 units for Part M4(3) 'wheelchair user' standards. The policy also sets out a requirement that at least 5% of new homes on greenfield sites of 25 or more units should be bungalows. Policy LPC03 'Gypsies, Travellers and Travelling Showpeople' addresses the needs for Gypsies, Travellers and Travelling Showpeople.				
30.	Can your affordable housing requirements, including any geographical variations, be justified?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2 The strategic aims of affordable housing for St Helens is outlined in Policy LPC02 'Affordable Housing' which includes 3 affordability zones for the Borough. An affordable housing policy was appraised by independent consultants, Keppie Massie, as part of the Economic Viability Assessment (EVA) and has been updated at every stage of the development of the SHBLP document. The Local Plan provides for the full need for affordable housing to be met.				
	Does the local plan policies update provide for the delivery of the full need for affordable housing? If not, can you explain and justify why?					

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		Policy LPC02 also sets out the circumstances in which affordable housing provision to help meet this need will be required and indicates the quantities that will be sought from open market housing development.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		<p>Reviewer Comments: The EVA demonstrates that there are geographical disparities in viability and this has informed the zonal approach proposed. The St Helens SHMA 2018 update, has identified a need for 117 new affordable units per years between 2016 and 2033.</p> <p>The Council's response to affordable housing is considered proportionate, related to evidenced needs and viability impacts.</p>				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
31.	<p>Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence?</p> <p>Does the local plan policies update make adequate provision for the identified needs?</p>	<p>Reason for score: +2 Relevant evidence has informed the preparation of the Plan.</p> <p>The 2014 GTAA identified a need for 8 permanent pitches but that the GTAA did not identify a need for accommodation for Travelling Showpeople.</p> <p>The SHBLP allocates land for 8 permanent pitches and 3 transit (limited length of stay) pitches.</p>				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		<p>Reviewer Comments: The Council consider that the GTAA provides a robust basis upon which the criteria-based policy.</p>				

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		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
32.	Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?	<p>Reason for score: +2 Yes, the GTAA identified that of the 8 permanent pitches required in the Borough: 6 were required between 2013 and 2018; 1 between 2018 and 2023; and 1 between 2023 and 2033. The GTAA also found a need for 3 transit pitches to be provided (capable of accommodating 6 touring caravans) for Gypsies and Travellers for the period 2013 to 2033.</p>				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		Reviewer Comments: As above.				
H	List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery	<p>Site Ref: GTA01 – Land north of Sherdley Road and west of Sutton Heath Road, Sherdley Road, Thatto Heath</p> <p>Site Ref: GTA02 – Land adjacent to land east of Sherdley Road Caravan Park, Sherdley Road, Thatto Heath</p> <p>Timescales for their delivery is set out above.</p>				
Justified approaches to plan policy and content						
33.	Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

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	<p>[You may wish to check each policy setting a threshold]</p>	<p>Reason for score: +2 Where a policy contains a threshold it is considered that a clear justification as to why this has been included is contained in the Reasoned Justification associated with that policy.</p>
		<p>Implications of taking no further action: Modifications to the Plan, potential delays at EiP</p>
		<p>Mitigation / Action required (if necessary) to move scale to right: No action required</p>
		<p>Reviewer Comments: The following SHBLP policies contain one or more threshold which trigger specific policy requirements, and are all justified by evidence and have further explanations for these requirement in the supporting reasoned justification:</p> <p>LPA05 ‘Meeting St.Helens Borough’s Housing Needs’ sets out minimum densities to ensure the optimum amount of housing development.</p> <p>LPC01 ‘Housing Mix’ – sets out a threshold requirement for the provision of ‘accessible and adaptable’ homes, ‘wheelchair user’ homes, and the provision of bungalows. These thresholds have been justified through the SHMA, which reinforces the fact that St Helens has an aging population and a high number of residents who have disabilities. The Council have a long waiting list for bungalow and accessible type homes in the Borough. The policy is considered flexible as it provides an exception clause should these thresholds lead to an unviable development.</p> <p>LPC02 ‘Affordable Housing’ – sets out a threshold of 10 or more units to contribute 30% of new dwellings on greenfield sites in the affordable housing zones 2 and 3, and 10% on brownfield sites in affordable housing zone 3. The zonal approach is set out and explained in the Reasoned Justification along with a map showing the different zonal areas.</p> <p>LPC04 ‘Retail and Town Centre’ – sets out local floorspace thresholds for when a retail and leisure impact assessment is required – this approach is considered to be in accordance with guidance set out in the NPPF and is justified by evidence contained in the St Helens Retail and Leisure Study (2017). It also sets out how the sequential approach should be applied in the context of designated centres. This is in accordance with guidance set out in the NPPF and NPPG.</p>

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		<p>LPC10 'Trees and Woodland' this has a requirement for the replacement of justified tree loss on a ratio of at least 2 for 1 ratio. The Reasoned Justification clearly sets out reasons why this is considered a justified requirement and in line with national policy.</p> <p>LPC12 'Flood Risk and Water Management' sets out the circumstances in which a flood risk assessment will be required. It includes a hierarchy for how surface water should be managed through the incorporation of an appropriate sustainable drainage system. The policy also includes threshold rates for greenfield and brownfield run-off rates. The policy is in accordance with the St Helens Strategic Flood Risk Assessment, the NPPF and NPPG.</p> <p>LPC13 'Renewable and Low Carbon Energy Development' states that proposals for new development within a strategic employment site or a strategic housing site (as defined in Policies LPA04.1 and LPA05.1) must, unless this is shown not to be practicable or viable, ensure that at least 10% of their energy needs can be met from renewable and / or other low carbon energy source(s). This has been aligned with the NPPF which supports the transition to a low carbon future in a changing climate and encourages the use of renewable energy resources.</p> <p>LPD03 'Open Space and Residential Development' requires development of 40 or more homes to make provision for new open space, the standards of which are set out in Policy LPC05. The threshold of 40 homes has been used as it has always worked well in practice, and there is no recent evidence that indicates that it should be changed.</p> <p>LPD05 'Extension, Alteration or Replacement of Buildings in the Green Belt' sets out a threshold of 30% for extensions to dwellings in the Green belt and also the replacement of dwellings in the Green Belt, and is in accordance with the NPPF and is considered appropriate in achieving a sensible balance in most circumstances.</p> <p>LPD09 'Air Quality' requires new development along the M62 past the Manchester Mosses Special Area of Conservation that results in 1,000 vehicles per day or 200 heavy goods vehicles to be accompanied by evidence identifying whether the resultant impacts on air quality would cause a significant effect on the ecological interests of the site. Air quality can also affect biodiversity and thereby impact on legal obligations under the Conservation of Habitats and Species Regulations 2017.</p> <p>LPD10 'Food and Drink' provides for a 400m exclusion zone around any primary, secondary or sixth form college for any hot food takeaway. This is justified in the Council's Hot Food Takeaway SPD and in the Reasoned Justification.</p>

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		All the above policies have been subject to economic viability testing.				
34.	Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear <i>why</i> matters will be covered in other Development Plan Documents or Supplementary Planning Documents and why this is appropriate?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2				
		The SHBLP references documents when outlining key details but does not defer detail on strategic matters to other documents. The Plan does refer to forthcoming documents such as masterplans and SPDs which aim to provide detail on matters which would be inappropriate to include within the Plan itself. This is considered appropriate.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		Reviewer Comments:				
		The approach to masterplans and other supporting documents is considered appropriate. The SHBLP's policies are succinct and provide sufficient clarity on most matters. On site specifics there needs to be further analysis and engagement to go into further appropriate detail. The timescales for delivery in the trajectory reflect this factor in particular.				
35.	Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2				
		The SHBLP is clear on its use of hierarchy in terms of developer contributions (LPA08), town centres (LPC04), heritage assets (LPC11), habitats (LPC06), sustainable drainage systems (LPD12).				

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	<p>[For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]</p>	Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		<p>Reviewer Comments: LPA08 'Infrastructure Delivery and Funding' includes a hierarchy of developer contributions</p> <p>LPB01 'St Helens Town Centre and Central Spatial Area' refers to a road-user hierarchy set out in the Liverpool City Region Transport Plan for Growth.</p> <p>LPC04 'Retail and Town Centres' includes a hierarchy of centres in the Borough, which have been defined in accordance with the St Helens Retail and Leisure Study and paragraph 85 a) of the NPPF.</p> <p>LPC06 'Biodiversity and Geological Conservation' sets out the hierarchy of sites and habitats found in the Borough, in accordance with paragraphs 171 and 174 a) of the NPPF.</p> <p>LPD12 'Flood Risk and Water Management' sets out the preferred sustainable drainage systems hierarchy for major developments. In line with the Council's adopted Sustainable Drainage Systems (SuDS) 2020 Design and Technical Guidance.</p> <p>The above approaches to hierarchy are considered to be appropriate and consistent with national policy.</p>				
36.	<p>Where policies seek to limit certain uses, is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence.</p> <p>[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2 The policies within the SHBLP that restrict or limit certain uses are in-line with national policy and can be evidenced.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				

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		<p>Reviewer Comments: LPA06 'Safeguarded Land' identifies land for safeguarding for future development. The policy states that proposals for housing and employment development of safeguarded sites in the Plan period will be refused. It also adds that development on any other site that would prevent or limit development of Safeguarded Land for its potential future uses will not be permitted.</p> <p>LPA09 'Green Infrastructure' limits development that would result in the loss, fragmentation or isolation of green infrastructure assets will be refused.</p> <p>LPB01 'St Helens Town Centre and Central Spatial Area' limits the change of use in the primary retail frontages in the St Helens Town Centre, and restricts development that would not provide an active ground floor window display.</p>				
37.	<p>Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development?</p> <p>[For example, onsite provision of open space, optional technical standards, internal and external space standards.]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2 All the local standards proposed for development are considered appropriate and supported by the evidence base, both in terms of need and impact on viability. All include a clear justification as to why they have been set in the Reasoned Justification sections of the policy.</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: No action required</p>				
<p>Reviewer Comments: LPC01 'Housing Mix' – sets out a threshold requirement for the provision of 'accessible and adaptable' homes, 'wheelchair user' homes, and the provision of bungalows. These thresholds have been justified through the SHMA, which reinforces the fact that St Helens has an aging population and a high number of residents who have disabilities. The Council have a long waiting list for bungalow and accessible type homes in the Borough. The policy is considered flexible as it provides an exception clause should these thresholds lead to an unviable development.</p>						

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		<p>LPC02 ‘Affordable Housing’ – sets out a threshold of 10 or more units to contribute 30% of new dwellings on greenfield sites in the affordable housing zones 2 and 3, and 10% on brownfield sites in affordable housing zone 3. The zonal approach is set out and explained in the Reasoned Justification along with a map showing the different zonal areas.</p> <p>LPD03 ‘Open Space and Residential Development’ requires development of 40 or more homes to make provision for new open space, the standards of which are set out in Policy LPC05. The threshold of 40 homes has been used as it has always worked well in practice, and there is no recent evidence that indicates that it should be changed.</p> <p>LPD09 ‘Air Quality’ requires new development along the M62 past the Manchester Mosses Special Area of Conservation that results in 1,000 vehicles per day or 200 heavy goods vehicles to be accompanied by evidence identifying whether the resultant impacts on air quality would cause a significant effect on the ecological interests of the site. Air quality can also affect biodiversity and thereby impact on legal obligations under the Conservation of Habitats and Species Regulations 2017.</p> <p>LPD10 ‘Food and Drink’ provides for a 400m exclusion zone around any primary, secondary or sixth form college for any hot food takeaway. This is justified in the Council’s Hot Food Takeaway SPD and in the Reasoned Justification.</p>				
		Deliverability				
38.	<p>Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2 An Economic Viability Assessment (EVA) has been produced by independent consultants Keppie Massie. The EVA is a number of documents that along with other documents to support the SHBLP and its policies, including the impacts of affordable housing, open space requirements and housing standards.</p>				

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		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		<p>Reviewer Comments: The viability of the SHBLP policies have been suitably tested. Further comments were sought from the company to address some of the representations made at Regulation 19 stage and have been included within the Regulation 22 Consultation Statement (Ref: SD004).</p>				
39.	<p>Does the local plan policies update reflect the conclusions and recommendations of your viability evidence?</p> <p>Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2 Yes, the Plan does reflect the conclusions and recommendations outlined within the EVA. For instance, it demonstrated that there are geographical disparities in viability and this has informed the zonal approach proposed. Policy LPC02 contains three separate affordable housing zones that follow ward boundaries. The Council has therefore divided the Borough into three affordable housing zones.</p>				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
<p>Reviewer Comments: The SHBLP policies take account of the EVA. Early discussion/engagement occurred with the Council's viability expert who provides advice also on individual site assessments and planning applications within the Borough on an on-going basis.</p>						
40.		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

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	<p>Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?</p>	<p>Reason for score: +1 The SHBLP includes a Monitoring Framework (Appendix 4). The Framework covers every policy within the Plan. It sets out an indicator, data source, target (where appropriate), a trigger for action and potential action for contingency. However, some sections lack detail and have not had targets and triggers set.</p>				
		<p>Implications of taking no further action: Potential need for modifications.</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: Provision of additional details as mentioned above.</p>				
		<p>Reviewer Comments: The monitoring proposed is considered proportionate and well related to the policies. The range of indicators has been expanded to take account of representations received at all stages of consultation. There is no reason to suggest that data required to monitor these matters will not be accessible to the Council.</p>				
41.	<p>Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u>?</p> <p>Where triggers for plan review and/or update are identified are they justified and proportionate?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +1 As part of the Monitoring Framework each indicator and target also has a 'potential action of contingency' which includes a review of the Local Plan or a review of the policies. The trigger for action section sets out what would lead to a review of the Plan or policies, but this too lacks any real detail.</p>				
		<p>Implications of taking no further action: None – National policy now expects such reviews to take place on a regular basis.</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: Set out a clearer timetable for a Local Plan review</p>				
		<p>Reviewer Comments: The monitoring framework discusses the potential need to review the Plan due to policy ineffectiveness and desired outcomes not being achieved.</p>				

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KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
Plan effectiveness (and associated policy clarity)						
42.	Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years from adoption? Does the evidence relied on to support those policies correspond/cover this whole period?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: -2				
		The SHBLP clearly sets out the timeframe for the Plan period 2020 – 2035. However, due to delays in submitting the Plan it may result in the Plan not being 15 years from adoption.				
		For each Policy within the SHBLP there is a key that sets out what strategic aims and objectives have been met, whether the policy is strategic or not and what the key delivery mechanisms are.				
		Implications of taking no further action: Further amendments and discussion at EIP				
Mitigation / Action required (if necessary) to move scale to right: Suggest additional modifications (minor mods) to amend the Plan period to affirm a 15 year Plan period						
Reviewer Comments:						
The Council are aware that when submitted the Local Plan will not have a full 15 years from the date of adoption as this is likely to be late 2021. Therefore, the Council will seek further advice from the examining Planning Inspector once appointed on this matter.						
43.	Does the local plan policies update clearly set out which <u>adopted</u> Development Plan policies it supersedes?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2				
		Paragraph 1.3.5 in Chapter 1 clearly states that the policies contained in the SHBLP will replace all current policies in the St Helens Local Plan Core Strategy (2012) and the previously 'saved' policies of the St Helens Unitary Development Plan (1998).				

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KEY QUESTIONS		Assessment				
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Paragraph 1.3.6 also sets out which documents the SHBLP will not supersede and will remain fully in place beyond the adoption of this Plan. These include the Joint Merseyside and Halton Waste Local Plan (2013) and the Bold Forest Park Area Action Plan (2016)				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		Reviewer Comments: As above				
44.	Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2 Yes, the policies are clear and easily readable in order to be applied for development management purposes. Each policy has a clear objective and is followed by a reasoned justification section that is concise and supportive of the policy. It sets out and justifies the approach taken in that particular policy.				
		Most policy areas are also shown on the proposed Policies Map (SD002), exceptions include the Affordable Housing Zones, potential New Greenway Routes and the Sankey Catchment Action Plan, which are all shown as figures within the Plan.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		Reviewer Comments: The aims and objectives are clear, the policies can be easily used and understood for decision making purposes. The Council has amended policies on the basis of comments received through the consultation process. The Plan and its policies have sought to be succinct and not duplicate higher tier policies or provide slightly different wording to address similar matters to reduce the potential for confusion.				
		-2	-1	0	+1	+2

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		Assessment						
		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>						
KEY QUESTIONS		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement		
45.	<p>For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; and (ii) clearly defined on the Policies Map?</p> <p>Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making?</p>	<p>Reason for score: +2 Yes, the policies in the SHBLP are clearly defined on the Policies Map, with the relevant policies listed in the Policies Map legend.</p> <p>The SHBLP includes a number of figures to help provide further understanding and clarity for a specific policy. For example, Policy LPC02 'Affordable Housing', Figure 6.1 shows a map of the Borough clearly identifying where the relevant affordable housing zones lie. Similarly Figure 7.2 identifies potential New Greenway Routes. Appendices 5, 6 and 7 provide maps of allocated, safeguarded housing and employment sites, including the Gypsy, Travellers and Travelling Showpeople allocated sites.</p> <p>Appendix 9 contains maps of Nature Improvement Areas, Appendix 10 contains maps of the Borough where the Mineral Resources and Licence Areas with Appendix 11 providing maps of all the designated Town, District and Local Centre Boundaries.</p> <p>All maps and graphics included within the plan are there to provide clarity, and help navigate the document, as well as improve readability through visual intrigue.</p>						
		Implications of taking no further action: None						
		Mitigation / Action required (if necessary) to move score to right: No action required						
		<p>Reviewer Comments: The Plan has sought to be presented in the best way possible to assist with legibility. Where there have been issues identified with the quality of graphics, the Council has sought to improve them and will be mindful of these points when the final document is adopted and the graphic designers/ printers commissioned to produce the final document.</p>						
				-2	-1	0	+1	+2

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		Assessment				
KEY QUESTIONS		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
46.	<p>Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording?</p>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2 The policies in the SHBLP make clear the type of development it will promote and uses positive rather than negative wording. However, this is not always appropriate and as such some policies include negative wording. For example, policies LPC12 'Flood Risk and Water Management' and LPD09 'Air Quality'.</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: No action required</p>				
		<p>Reviewer Comments: The SHBLP has sought to positively address growth and development within the borough. As such its policies seek to encourage positive outcomes, rather than focussing on what should not occur.</p>				
47.	<p>Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed.</p> <p>[Note: If you have said 'all development' this implies equal application irrespective of the development scale/use/location and this may not be either justified or deliverable]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +2 Policies apply to all scales, uses and locations unless otherwise specified. It is considered that the policies relate to an appropriate scale of development and are clear in outlining when it is expected that they will apply.</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: No action required</p>				
<p>Reviewer Comments: Overall, policies are clear where they refer to a specific use and as appropriate reference is made to types of development in particular locations.</p>						

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		Assessment				
KEY QUESTIONS		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
I	<p>State how many policies are in your local plan update?</p> <p>Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.</p>	<p>The SHBLP contains a total of 40 policies. These have been separated into 5 sections:</p> <ul style="list-style-type: none"> • Core Policies • Area Policies • Homes and Communities • Environmental and Resources • Development Management Policies <p>(i) No policies within the SHBLP repeat parts of other policies.</p> <p>(ii) Replication of the NPPF has been minimised as far as possible, but where this has occurred it has been rephrased and is considered necessary to clarify the overall policy approach.</p> <p>(iii) Policies that include cross reference to other policies within the Plan include: LPA02, LPA04, LPA04.1, LPA05.1, LPA10, LPB01, LPB02, LPC01, LPC05, LPC10, LPC13, LPD01, LPD02, LPD03, LPD07 and LPD09.</p>				
48.	<p>Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies?</p> <p>If you find duplication or repetition you may want to take minute to consider whether this is appropriate.</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: +1 Cross references and some repetition within the SHBLP are limited to that necessary to ensure appropriate clarity and delivery of the Plan.</p>				
		<p>Implications of taking no further action: None</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: No action required</p>				
		<p>Reviewer Comments: It is recognised that there is cross referencing and repetition within the SHBLP and as such this response is identified as +1 rather than +2. However, it is considered that where utilised this has been to ensure the proper application of the Plan and aide its usefulness for the reader and decision maker.</p>				
		-2	-1	0	+1	+2

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		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
49.	Do policies avoid duplicating other regulatory requirements (for example, building regulations)?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2 The policies do not duplicate other regulatory requirements. However, Policy LPC01: Housing Mix, goes beyond them, in relation to 'accessible and adaptable' and 'wheelchair user' standards in housing.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
		Reviewer Comments: The SHBLP does not appear to duplicate other regulatory requirements				
50.	Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker? [For instance, policies should avoid using overly subjective terms such as "to the Council's satisfaction", "considered necessary by the Council" or "appropriate" without associated clarification.]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: +2 Every effort has been made to ensure that the proposed policies avoid ambiguity and that any specific requirements are justified and clear in how they would be applied in the decision-making process.				
		Implications of taking no further action: None				
		Mitigation / Action required (if necessary) to move scale to right: No action required				
Reviewer Comments: The Council have in each policy set out a clear approach to policy implementation, avoiding ambiguity in the decision-making process. The term 'to the satisfaction of the Council' is used once and clearly sets out what the requirements are. The term 'appropriate' has also been used on a number of instances but it has been clearly clarified within the policy and in the reasoned justification.						