



ST HELENS
BOROUGH COUNCIL

**ST HELENS BOROUGH
LOCAL PLAN 2020-2035**

**ST HELENS BOROUGH COUNCIL'S RESPONSE
TO INSPECTORS MATTERS ISSUES AND
QUESTIONS**

**Matter 10 – Infrastructure and Delivery
Matter 11 – Monitoring and Implementation**

SESSION 11 – 9:30 TUESDAY 22 JUNE 2021

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Matter 10: Infrastructure and Delivery

(Policies covered: LPA08, LPA09, LPA02 Appendix 2: Definition of Infrastructure, Appendix 4: Monitoring Framework)

Issue 1: Definition and scope of infrastructure required

- 1. In general terms will Policy LPA08, the IDP and other policies of the Plan, including allocation policies, ensure that necessary infrastructure is delivered and in a timely fashion?*

The provisions of Policy LPA08 in combination with other policies of the Plan and in conjunction with the Infrastructure Delivery Plan (IDP) will ensure that appropriate and necessary infrastructure is provided in a timely fashion to support development proposals and that future development contributes towards mitigating any issues that it may create.

The IDP has been prepared to provide an over-arching framework to support the successful implementation of the Local Plan by establishing the infrastructure required to support the new development in the district. The IDP schedule provides detail on the infrastructure that is required to deliver the Local Plan (what it is, who is involved, cost, funding sources, timescales and priority level), while Policy LPA08 provides the policy mechanism for delivering the infrastructure.

The implications of Policy LPA08 have been taken into account in assessing the viability of developments (VIA001). The viability evidence base tested a wide range of infrastructure costs based on the evidence presented within the IDP.

The IDP has been prepared with the full involvement of service providers and relevant stakeholders to reflect the requirements of allocated sites and other strategic infrastructure requirements in the district. In addition to discussions with the service providers, the IDP takes into account the outcomes of technical studies and relevant strategies and investment plans of the service providers.

The IDP has evolved in tandem with the plan, and will continue to be a living document as the plan is implemented. Policy LPA08 provides guidance on how infrastructure will be delivered to support new development, including the mechanism for securing the infrastructure and/or funding to provide this. The policy reflects the importance attached to ensuring that infrastructure is provided at the appropriate time, to support new development, and to establish a framework to secure infrastructure through a phased approach, including the use of conditions or planning obligations, where appropriate.

Finally, the partnership approach that has been taken to working with infrastructure providers and landowners to prepare the Local Plan and IDP means that there is a clear understanding of what infrastructure is required during the course of the plan period and when the need arises. This approach allows service providers to factor these requirements into their future investment plans, and the district council will continue to work with partners to secure timely delivery of infrastructure.

The Council plans to use a mixture of planning obligations and planning conditions to secure the required improvements or funding. There are particular infrastructure issues, as set out in the IDP, relating to the whole District. The District Council plans to address these issues through a mixture of financial contributions from s106 and external funding sources. The policies in the local plan will ensure that district wide infrastructure projects are delivered at the right time and in the right place. These will guide development and ensure phasing and trigger mechanisms deliver the required infrastructure.

2. Will the mitigation measures identified be sufficient to address the highway impacts identified?

The Infrastructure Delivery Plan (IDP) (SD013) will support the implementation of the Local Plan and sets out what level of new or improved infrastructure will be required to deliver the growth proposed. Table 2 (page 15) of the IDP sets out the identified pressure points within the highway system and potential improvements to the highway network. All infrastructure improvements designed to mitigate Local Plan development included within the IDP would fully incorporate road safety considerations and features within schemes. The mitigation measures listed required to address the highways impact are considered sufficient. As shown in the Council's response to the preliminary questions (SHBC001 – PQ65), some of the highway schemes included in the IDP are complete, others are in progress, with funding secured for a number of significant schemes. As evidenced in the Transport Impact Assessment, whilst there are potentially some individual locations where the highway network may see some cumulative impacts higher than the baseline position after mitigation, these will need to be considered and understood in the context of more detailed local assessment work associated with individual planning applications and Transport Assessments. Other site-specific measures to be determined during the Development Management process will be secured for delivery by S106 to support the development.

3. Is the Council satisfied that the LP proposals would not have an unacceptable impact on highway safety or the residual cumulative impacts on the road network would not be severe (see SHBC001 – PQ65)?

The Council is satisfied that proposed development in the Local Plan would not have an unacceptable impact on highway safety and that the residual cumulative impacts on the road network would not be severe.

All infrastructure improvements designed to mitigate Local Plan development included within the IDP would fully incorporate road safety considerations and features within schemes. Some of the highway schemes included in the IDP are complete, others are in progress, with funding secured for a number of significant schemes.

The Transport Impact Assessment assesses the likely cumulative effect of the Plan's proposals on the highway and public transport network. The assessment takes account of potential growth in other nearby local authorities. Impacts on the local network, including key congested junctions, are identified, and mitigation schemes set out in Table 2 of the IDP.

The assessment indicates that subject to mitigation measures, the overall level of growth proposed in the Plan is capable of being accommodated. St Helens includes (within its area) two junctions on the strategic road network, at M6 Junction 23 in Haydock and M62 Junction 7 in Rainhill. Assessment of the SRN was also undertaken and related mitigation schemes included in the IDP. Further detailed modelling and/or studies required for any specific sites has been indicated. As evidenced in the Transport Impact Assessment, whilst there are potentially some individual locations where the highway network may see some cumulative impacts higher than the baseline position after mitigation, these will need to be considered and understood in the context of more detailed local assessment work associated with individual planning applications and Transport Assessments.

Overall, The Council is satisfied that any impact can be substantially mitigated by a combination of committed and emerging future highway infrastructure projects, modest changes in travel behaviour and lower cost improvements across key junctions.

4. How will the Council work with infrastructure and service providers (including the Liverpool City Region, Merseytravel, Highways England, developers, landowners and neighbouring authorities) to identify and address any impacts of proposed development, including through the use of contributions and through the implementation of highway improvement schemes?

As set out in the Plan, the Council is working closely with infrastructure and service providers (including the Liverpool City Region, Merseytravel, Highways England, developers, landowners and neighbouring authorities) to identify and address any impacts of proposed development, including (in appropriate cases) through the use of contributions and through the implementation of highway improvement schemes. The IDP identifies all the significant known infrastructure schemes that are required to deliver the Local Plan. It also identifies other schemes that would contribute towards the delivery of the plan or that would impact upon the Borough over the plan period. Many of these schemes link to other studies. A key means to deliver these infrastructure and services require the Council to work collaboratively with external partners and adjoining authorities. The Duty to Co-operate Statement (SD009) Appendix 2 sets out how infrastructure providers / external partners have been engaged and how the engagement will continue as demonstrated. Statements of Common Ground have been provided to this effect, for example with the LCR Authorities (SD010) and Highways England (SD031).

A key means to deliver the required infrastructure and services will also be through developer contributions, as set out in the IDP. The Council will continue to liaise with infrastructure and service providers, landowners and developers in determining the appropriate levels of developer contributions. The IDP will be regularly updated to take account of additional projects that arise from such discussions.

5. How will the Plan help to deliver these projects?

The Council has agreed to an MM to Policy LPA07 1 (a) to make it clear that rail improvements will form part of the infrastructure necessary to achieve the Council's strategic priorities. As such, rail projects such as a new railway station at Carr Mill and the Skelmersdale Rail Link scheme are referenced in the Liverpool City Region Combined Authority Long Term Rail Strategy (2018) (see TRA009). The Infrastructure Development Schedule Table in Section 7 of the IDP provides key information on how each of the projects will be progressed, funding requirements and partners. The Council is fully committed to working with site promoters and other to support these projects as seen from the current application at Carr Mill and rail enabled site development at Parkside East.

6. Is it clear from the wording of Policy LPA07 how a decision maker should react to development proposals for these rail projects (in line with paragraph 16 d) of the Framework)?

Paragraph 16 (d) of the Framework states that Local Plans must contain policies that are clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals. Policy LPA07 makes clear reference to the rail projects and the requirements for any scheme that may come forward. Further, this information is expanded in the supporting text. It is considered that the Plan has sufficient information in the policy in terms of providing clarity to development proposals for the rail projects. This has been tested through the Carr Mill site planning application for residential use (which seeks to safeguard land for the railway station). Moreover, the supporting text in the Plan makes reference to other documents (such as Liverpool City Region Combined Authority Long Term Rail Strategy (2018) – (TRA009) and Long Term Rail Strategy (TRA009) which provides wider context and clarity.

Issue 2: Developer Contributions

7. How is the strategy in relation to developer contributions to be implemented by the LP (see SHBC001 – PQ69)?

Policy LPA08 provides a range of criteria in relation to developer contributions from new developments, including a hierarchy of developer contributions, and the use of viability assessments. This provides sufficient clarity in terms of how developer contributions will be determined. The policy provides the flexibility in developer contribution requirements and makes allowance for making a decision on a site by site basis. Criterion 4 refers to the IDP (SD013) which will be updated regularly through the lifetime of the Plan, and will act as a tool to help ensure that any existing or likely infrastructure capacity issues are understood and clearly identified. Please see SHBC001-PQ69 for further details.

8. Is the approach set out in Policy LPA08 effective and does it strike the right balance between flexibility and certainty for applicants?

The Council believes the approach set out in Policy LPA08 has the right balance of flexibility and certainty. It is a high-level policy that provides flexibility, where necessary and appropriate. Flexibility is provided around on-site or off-site infrastructure and / or financial contributions that will be secured by (Section 106 planning obligations (or other legally binding agreements) and / or tariff based system such as the Community Infrastructure Levy decision makers.

Issue 3: Viability

9. Does the EVA make realistic assumptions about land values, sales values, finance, profit and development costs?

Yes, it does. The assumptions used in the viability assessments are set out Section 5 of the Local Plan Viability Assessment (VIA001), the “EVA”. These assumptions are informed by the Evidence Base set out in Section 4 of the study. The assessment has regard to guidance in the National Planning Practice Guidance (PPG) and the document entitled ‘Viability Testing Local Plans’

In accordance with the guidance contained in the PPG and also Viability Testing Local Plans, the Study adopts a benchmark land value based on existing use value plus a suitable premium to the landowner. This is defined in the PPG as EUV+. The starting point of the approach is to assess an appropriate existing use value for the site typologies. For brownfield typologies then as outlined in para 5.15 this is informed by the evidence contained in Appendix 4 and is based on commercial land values. Existing use values for greenfield sites are based on agricultural land values and details of existing use values are provided at para 4.83 and 5.19.

The landowner premiums adopted for brownfield sites range from 50% of EUV in zone 1 to 75% in zone 3. For greenfield sites then as noted in SD004 Appendix 22 para 4.9 the landowner premium equates to between 14 and 24 times EUV, giving an overall benchmark land value equivalent to between 15 and 25 times EUV.

As a sense check then as noted at para 5.22 the EVA also has regard to sales of land with residential planning consent (Appendix 4) however these transactions are based on pre-existing policies and hence are not directly comparable for the purpose of the study.

Table 5.1 (page 68) provides a summary of the range of benchmark land values adopted for the residential typologies. Table 5.2 (page 70) provides a summary of land values adopted in relation to commercial developments.

The approach that has been taken then clearly accords to that outlined in best practice guidance including the PPG (2018). The EVA is based on ‘EUV+’ an approach that Keppie

Massie always adopt in undertaking Local Plan and CIL Viability Studies as this meets best practice and has been found sound by Inspectors in reviewing other EVA studies that they have undertaken elsewhere.

For the residential viability assessments, the best form of evidence of sales values is that from new build housing developments in the Borough. The EVA contains evidence of sales and asking prices from these developments at Appendix 2 and this is also summarised at Tables 4.7 – 4.9. To illustrate average house prices spatially across the Borough figure 4.6 and 4.7 show details of overall average house prices. Further justification for the values adopted is also contained at paras 4.36 - 4.44 and a summary of the sales prices adopted is contained at table 5.3.

SD004 Appendix 22 para 5.9-5.13 contains further evidence to support the sales values that have been adopted for bungalows.

Tables 4.10 to 4.16 contain an overview of the commercial transactions that have been used to inform the study, this evidence has been obtained from Land Registry and data bases such as Co-star and EGi. This information has then been used to inform the commercial sales values detailed at table 5.7.

The EVA adopts an interest rate of 7%. This is a reasonable allowance for interest costs and indeed is slightly above the general average rate in FVAs submitted to Keppie Massie for review which more recently has been in the range of 6-6.5%.

For the residential developments the study applies a developer's profit of 20% of GDV both for the market and affordable housing. This is considered to be a very robust position as typically a lower level of profit (at around 6%) will be applied to affordable housing which carries less risk. For the small developments tested (5 and 10 dwellings) a profit of 17.5% has been applied reflecting the more limited risk profile of these developments. The viability testing for the speculative commercial developments is based on a developer's profit of 15% on cost which is a typical level and widely applied in the industry.

In light of the guidance contained in the PPG the assumptions made are considered to be generous. The PPG states that

“For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies.”

and

“A lower figure may be more appropriate in consideration of delivery of affordable housing in circumstances where this guarantees an end sale at a known value and reduces risk.”

The profit assumption at 20% for both market and affordable housing clearly exceeds the guidance in the PPG which envisages that a profit at 15% of GDV with a lower figure for the affordable housing may be suitable for the purpose of plan making.

To ensure robustness the construction costs that have been adopted for the site specific and generic testing have been prepared by a Quantity Surveyor and full details relating to their approach and assessment is contained at Appendix 5 of the EVA. These cost assessments are based on current building regulation requirements and are inclusive of substructures, super structures, all external works, incoming services and drainage, preliminaries, professional fees and a contingency at 5% of all costs. In relation to the site specific cost assessments these also include costs associated with known requirements or constraints in relation to a particular site for example dealing with highway works. The construction cost assessments are informed by Local Market Evidence.

In light of two responses received relating the construction costs adopted in the EVA, a briefing note was prepared by Keppie Massie titled Database and Construction Cost Assessment. This forms part of SD004 Appendix 21 and 22. The document provides a detailed analysis of the cost database including average allowances for professional fees and contingency.

The EVA includes reasonable, typical industry standard allowances for matters such as sales and marketing costs (3.5% GDV) and acquisition costs (SDLT plus 1.8%).

The EVA assumes that affordable housing and public open space are provided onsite for schemes above the relevant policy thresholds. The testing also includes contributions for education based on the Council's standard formula and a residual S106 contribution of £1,000 per dwelling. SD004 Appendix 21 table 2.1 contains a summary of S106 contributions secured by the Council. As noted in para 2.6 then based on this data the residual S106 contribution for highways and health is a total of £386 per dwelling, hence the assumption of £1,000 per dwelling is robust.

The assumptions in the EVA are considered realistic and robust based on best available information. They align with advice in guidance and are typical of similar studies that Keppie Massie have undertaken elsewhere which have been found sound.

Issue 4: Green Infrastructure (GI)

10. Is the inclusion of rural areas in the definition of GI justified?

On reflection, the inclusion of rural areas as a whole in the definition of GI is not justified in view of the NPPF Annex 2 (Glossary) definition. GI relates to the network of multi-functional natural assets that can be located within urban and rural areas. As a result, the definition of green infrastructure in Appendix 1 of the LPSD will require modification (see response to question 12 below).

11. How would rural areas be defined?

The rural areas of St Helens Borough are those that lie outside the built-up, urban areas, beyond the identified settlements.

12. Are the definitions of GI contained within the Plan consistent (criteria 1 of policy LPA09, paragraph 4.33.2, GI in the Glossary to the Plan at Appendix 1)?

Proposed main modification MM051 in the Draft Main Modifications Schedule (SHBC010) seeks to modify Policy LPA09 and the reasoned justification. However, in view of the above responses above, this proposed main modification needs to be amended to ensure the proposed changes will make the policy and reasoned justification justified and consistent with national policy.

The initial change in MM051 to change 'countryside' to 'rural' will assist in ensuring the wording is consistent with the NPPF, and so should be retained.

Following on from the response to question 10 above, the definition of GI in the glossary (Appendix 1) of the LPSD requires a modification to ensure consistency with LPA09 and the NPPF. The following is suggested:

"A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. It is a network of open spaces, waterways, gardens, woodlands, green corridors, **and** street trees ~~and open countryside~~ that brings many social, economic and environmental benefits to local people and communities. Some examples of these are parks, street trees, gardens, grassland, rivers and ponds".

Finally, paragraph 4.33.2 of the LPSD should be modified, as follows:

~~"The Green Infrastructure network includes (in addition to urban greenspaces, trees, and water bodies etc.) the countryside around the towns, which accounts for around 50% of the Borough's land area. This is predominantly productive farmland. The importance of countryside around the Borough's more urban locations was recognised by the pilot study Countryside In and Around Towns undertaken with the Countryside Agency (now Natural England) in 2006. In implementing Policy LPA09 (in both urban and rural areas) the Council will seek to liaise closely with, and where necessary work in partnership with, landowners".~~

The proposed changes to the GI definition in Policy LPA09, the glossary and paragraph 4.33.2 as suggested above should be used to update the proposed main modification (MM051) in SHBC010. As a result, the definitions of GI within the LPSD will be consistent with each other and align with the NPPF.

13. Is the definition of GI consistent the Framework?

Yes, taking account of the proposed changes outlined above (in response to question 12), the definition of GI is consistent with the NPPF.

14. Is this policy justified and consistent with national policy?

Yes, Policy LPA09 is consistent with NPPF paragraph 171 which states that planning policy should “*take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries*”. Policy LPA09, criterion 2 indicates how the Council will work collaboratively with a variety of stakeholder partners to enhance and improve the current status of the natural environment across the Borough.

In addition, compliance with policy LPA09 will support a number of the main themes in the NPPF, such as promoting healthy and safe communities, promoting sustainable transport, achieving well-designed places and meeting the challenges of climate change, flooding and coastal change.

The policy is justified as it recognises the importance and value of the Green Infrastructure network and the assets that comprise it, and therefore the need to provide appropriate protection. However, there is flexibility within the policy in the form of a recognition that there may be times when loss of or harm to GI assets may be unavoidable or justified, and at such times, mitigation and / or compensatory provision will be required. It is therefore considered justified and consistent.

15. How would it be demonstrated that appropriate protection or retention of GI assets cannot be achieved?

Discussions concerning GI will be held during the development management process, and with a particular focus on the strategic employment and housing sites, Policies LPA04.1 and LPA05.1 require any planning application to be supported by a comprehensive masterplanning process, which will include the provision a Green Infrastructure Plan. The DM process, and the details provided to inform it for sites identified as ‘strategic’ and those that are not, will enable the Council to review proposals on a case-by-case basis to understand whether there are circumstances meaning the appropriate protection or retention of GI assets cannot be achieved.

Section 4 of Policy LPA09 provides a framework to provide such information, but would perhaps benefit from an additional reference to the need to demonstrate the specific reasons why the protection or retention of GI assets may not be achievable through the Development Management process when an application has been submitted.

16. What mitigation, other than compensatory provision, would be required?

The Council has proposed additional wording to policy LPA09 criterion 4 to provide further clarification and illustrate an example of a form of mitigation that would be required regarding the loss of green infrastructure (MM052, SHBC010). The design and layout of sites, particularly those of a larger scale, could enable existing fragmented assets within sites to be better connected through the use of footpaths lined with hedgerows which connect assets, or the provision of sustainable urban drainage systems etc. The detailed design of schemes has the potential to present mitigation opportunities in response to site specific circumstances.

These will be considered on a case by case basis through the planning application process. The Policy does not attempt to specify the types of mitigation in recognition that the opportunities to deliver it could be very wide range and are dependant on site specific circumstances. Therefore, it is considered appropriate to keep the wording flexible.

17. How could Section 4 of Policy LPA09 be modified to provide greater clarity on where the loss of GI might be acceptable to ensure that the policy is effective and consistent with national policy?

Proposed main modification MM052 (SHBC010) seeks to improve the format of this section of the Policy to make the decision making framework clearer. The Council considers that policy LPA09, criterion 4 provides a clear and reasonable framework to enable the assessment of where the loss of green infrastructure might be acceptable, without being overly prescriptive.

It is recognised that there could be a significant number of circumstances where the loss of GI might be deemed acceptable, such as the necessity to provide key infrastructure within a certain area of a development, or to meet site-wide design objectives for a development etc. On that basis, the Policy does not attempt to set out all such possible circumstances. However, if considered appropriate, a broader form of wording could be used at the end of sub-section a) (MM052), along the lines of "... in the pursuit of achieving wider planning objectives."

18. Will the policies of the Plan, including LPC05 and LPD03, ensure sufficient protection and provision of open space?

Yes, many of the policies in the Plan support the need to protect, provide and expand the network of open spaces in the Borough. Whilst the primary policies to secure this would be considered as LPC05, LPD03 and LPA08, Policies such as LPA03, LPA04.1, LPA05.1, LPA09, LPA11, LPC07, amongst, others provide further support to the importance of protecting existing and providing new open space.

Policies LPC05 and LPD03 have been informed by the relevant evidence and are considered realistic in terms of the ability to deliver.

19. Is the threshold of 40 dwellings for the provision of open space positively prepared, justified and consistent with national policy?

The threshold of 40 dwellings for the provision of open space is positively prepared, justified and consistent with national policy.

In response to the Inspectors' request (INSP006), additional viability testing was undertaken regarding the provision of open space for residential schemes of 10 dwellings (VIA002, to be read alongside the Economic Viability Assessment, VIA001). As a result, the Council is reassured and satisfied that the setting of a threshold of 40 dwellings will enable the provision of open space requirements to be facilitated whilst also supporting the delivery of other policy requirements such as contributions for education, affordable housing etc.

20. Is this approach justified and effective?

The Plan provides framework for the provision of open space including formal outdoor sports facilities and adopts a flexible approach that such facilities may be provided through direct on-site facilities or through contributions towards new or existing off-site provision. The Plan does not recommend provision for new development through a standard of provision on outdoor sport requirements. Instead, it requires developers to refer to the latest evidence of outdoor sports space to understand the potential contributions that will be required. The Council has commissioned the work to update the Playing Pitch Strategy and Action Plan (OPE005), the outcome of which will need to be considered by developers. This approach is considered effective and in alignment with the advice from Sport England and the principles set out in para 96 of the NPPF.

21. Is it clear from the policies in the Plan what level of new provision for outdoor sport, strategic housing allocations will be expected to provide?

Table 7.1: Open Space Standards and para 7.3.12 in the Plan make a clear reference to the Council's latest Playing Pitch Strategy and Action Plan which contains the needs assessment and site-specific recommendations for outdoor sport requirements. The current Playing Pitch Strategy and Action Plan is in the process of being updated, which when adopted will provide the most up to date information on the levels of outdoor sport provision requirement for new development including strategic housing allocations. The Policy is also clear about the need for the new development to take account of the surpluses and deficiencies of outdoor sports provision within the area where the site is located.

Whilst it is acknowledged that the Plan does not set out the level of new provision for outdoor sport, it provides sufficient clarity in terms of where the information can be found.

22. Will the recently commissioned update to the Playing Pitch Strategy and Action Plan be able to inform the policies and proposals within this Plan?

The new Playing Pitch Strategy (PPS) and Action Plan will not be available in time to inform the policies and site requirements in the LPSD itself through the Examination process. However, once available it will be used to inform the outdoor sports requirements for sites as per Table 7.1 in the LPSD (page 100) through the implementation of the Plan, until such time as it is replaced by a more up to date version.

Also, paragraph 7.3.13 of the LPSD indicates the Council's intention to create a Supplementary Planning Document (SPD) relating to open space, which the outcomes from the updated PPS and Action Plan will support the creation of.

Issue 5: Parking Standards and vehicle charging points

23. Is the policy effective and clear without the inclusion of the requirements for parking and vehicle charging point (possibly as an Appendix)?

Yes. The Council considers that a new Transport SPD, and not in a LP appendix, to be the appropriate location for providing requirements for parking and vehicle charging point, building on the parking standards information currently contained in an existing SPD(LOC009 – Ensuring a Choice of Travel SPD). The revised SPD will take into account all aspects of para 105 of the NPPF and will follow due process in adoption by the council once produced. The standards set out in the SPD will also need to be able to show flexibility to change as uptake of electrical vehicle increases over time. The NPPF recognises this in saying there is a need to ensure an 'adequate' provision' – something which can only really be quantified as part of looking at the transport offer as a holistic picture. Moreover, accommodating this information in an appendix would introduce delay and/or separate intrinsically linked elements of transport planning for new sites.

24. Should the LP be more prescriptive in requiring charging points having regard to Section 9 of the Framework and the evidence base (EVA)?

No. The level of parking and EV charging required is intrinsically related to the availability and suitability of other modes of transport from a development site, and separating out charging points would unduly detach one mode from the broader transport situation for development. The Section 9 of the Framework requires the Plan to look at all transport matters holistically. Moreover, the EVA concludes that The cost of electric vehicle charging points is minimal and makes no significant difference to the base construction costs and will have a very limited impact on overall viability. The Council considers that the LP should remain less prescriptive.

25. Could the requirements set out in the existing SPD be referred to if the intention is to keep any future updates broadly similar?

Criterion 9 of Policy LPA07 makes clear reference to Ensuring Choice of Travel SPD albeit in the context of it being reviewed to incorporate new details, for example, those related to the Council's vehicle and cycle parking standards, standards for vehicle charging point provision, and to the requirements concerning transport assessments, transport statements and travel plans. Para 4.27.9 in the supporting text also refers to the commitment to update the SPD. These references are considered sufficient and no further references are necessary.

Matter 11: Monitoring and Implementation

Issue 6: Monitoring and Implementation

26. Taking into account any modifications, is the Plan clear in indicating how the Plan's policies and proposals will be monitored?

Modifications have been proposed to the Monitoring Framework in Appendix 4 of the LPSD, which can be seen in Annex 6 of the Draft Main Modifications Schedule (SHBC010). These modifications have improved how the Plan will be monitored, and ensure the indicators, targets, triggers for action and potential actions are all clear and implementable.

27. Will the indicators in the monitoring framework be effective in monitoring the success of the Plan's policies and proposals?

Yes, the Monitoring Framework indicators, as updated through Annex 6 of SHBC010, are effective. The indicators have been carefully considered and established in view of the data that will be available to report on the effectiveness of the Policies. As a result, the Council will have a clear picture of whether or not the policies are effective over the Plan period, or whether further action may be needed.

28. Is the LP clear as to when a need to update the Plan before five years would be triggered, for example, for reasons relating to the delivery of housing?

Yes, the Monitoring Framework, as proposed to be amended through Annex 6 (SHBC010) does set out in the 'potential action' column, where if there is significant underperformance against targets, there may be a need to review the Plan, and this is separate to the need to review five years after adoption.

With respect to the delivery of housing, five year housing land supply is in the Monitoring Framework as an indicator, with a trigger for action of 'having fewer than 5 years' supply'. There are then a number of potential actions associated with this, including 'consider early review of the Local Plan if there is long-term underperformance against the 5 year supply' (as proposed to be modified in SHBC010).

Therefore, the Local Plan is clear in this regard.

29. Is the Plan clear as to which SPDs will be updated and prepared to provide guidance on the implementation of the Plan?

The Plan does make reference to the future SPDs to be prepared and updated in the body of the text, such as the intention to provide further guidance on requirements for open space provision and enhancement in a future SPD in paragraph 7.3.13.

However, there may be merit in providing an overarching reference to the planned future SPDs to assist in the implementation of the Plan at the beginning of the document, perhaps at the end of section 3 (page 15).