

St Helens Local Plan

Sustainability Appraisal

Addendum to the SA Report

December, 2019
Updated September 2020

Revision History

Revision	Revision date	Details	Name	Position
V1.0	Nov 2019	Draft for client review	Ian McCluskey	Principal Consultant
V1.1	Dec 4 th , 2019	Final report for internal review	Ian McCluskey	Principal Consultant
V1.1	Dec 6 th , 2019	Final Report signed-off	Frank Hayes	Associate Director
V1.2	Dec 15 th , 2019	Minor updates to reflect final agreed modifications	Ian McCluskey	Principal Consultant
V1.3	Sept 21 st , 2019	Further updates to reflect focused changes	Ian McCluskey	Principal Consultant

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Table of Contents

NON TECHNICAL SUMMARY	1
1. Introduction	2
2. Minor amendments.....	2
Introduction.....	2
Scoping	2
Screening and appraisal of the minor modifications.....	2
Reasonable alternatives.....	3
Mitigation and enhancement	3
Monitoring.....	3
3. Typographical errors	3
Introduction.....	3
4. Responding to representations.....	4

APPENDIX A: CHANGES TO CORRECT TYPOGRAPHICAL ERRORS TO THE SA REPORT (JANUARY 2019)

APPENDIX B: SUMMARY OF CONSULTATION REPRESENTATIONS

APPENDIX C: SCREENING THE MINOR MODIFICATIONS

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NON TECHNICAL SUMMARY

An addendum to the SA Report has been prepared to deal with the following matters:

- To explore the implications of proposed modifications.
- To address typographical errors in the SA Report.
- To respond to consultation representations.

With regards to the modifications, there are some improvements in relation to the historic environment, traffic, and biodiversity. However, these do not change the overall conclusions / effects that were identified in the SA Report.

With regards to reasonable alternatives, no further strategic alternatives need to be appraised in the SA.

No mitigation or enhancement measures have been identified at this latest stage of the SA.

It is not necessary to include additional monitoring measures as the conclusions of the assessment remain the same as within the Environmental Report (which already contains an appropriate monitoring framework).

The typographical errors relate purely to the numbering of the employment options. The findings are exactly the same.

The majority of comments in relation to the SA Report were about the site appraisal outcomes; with site promoters disagreeing with some of the outcomes. This mainly relates to the fact that the appraisal was 'mitigation-off', so the scores for some sites appear more negative than would be the case should the measures being proposed by site promoters be put into place.

A small number of changes have been recorded where it is agreed that scores are factually incorrect.

Site ref / name	SA Objective	SA Report score	Amended score
Site 8HS	SA20: Access to Convenience Store	Amber	Red
	SA8: Heritage	Red	Amber
	SA13: Education	Grey	Green
Site 10HA	SA16: Housing delivery	Green	Grey
Site 1HS	SA20: Access to Convenience Store	Green	Grey

1. Introduction

- 1.1 Following consultation on the St Helen's Local Plan (Pre-submission), a number of minor amendments were proposed by the Council. Further focused changes were made and an updated Schedule of Modifications prepared in September 2020.
- 1.2 The purpose of this report is to explore the implications of these amendments with regards to the sustainability appraisal findings (as set out in the SA Report, January 2019).
- 1.3 In addition, the Addendum identifies and clarifies typographical errors that have been identified in the SA Report in relation to the Strategic Employment Alternatives appraisal.
- 1.4 Finally, the Addendum provides a summary of consultation representations received that are of relevance to the SA (including a suitable response).

2. Minor amendments

Introduction

- 2.1 A number of minor modifications have been proposed so that the pre-submission Plan can be updated to reflect:
 1. A need to address typographical issues,
 2. A need to provide clarity in response to particular issues,
 3. Specific representations made on the pre-Submission Plan.
- 2.2 It is important to explore what the implications of this are in terms of the SA findings. As such, the modifications schedule has been screened, and a comment is provided for each amendment to outline what the implications are for the SA. The detailed schedules are set out as Appendix A and B to this Addendum.

Scoping

- 2.3 The scoping information as set out in the Scoping Report and SA Report remains valid and has been used to inform the assessments in this addendum.

Screening and appraisal of the minor modifications

- 2.4 In summary, the vast majority of modifications are unlikely to have any effects upon the SA findings. The most notable changes are those relating to the site specific clauses. The additional modifications made in September 2020 were all 'screened out' as being unlikely to lead to significant effects or a change in the SA findings.
- 2.5 There are implications with regards to only two SA topics as a result of all the modifications. These are discussed below.

Traffic, transport and air quality

- 2.6 The minor mods (including the amendments to site specific clauses) provide greater clarity that the strategic development sites will need to be supported by sustainable modes of travel. This is positive in terms of addressing potential traffic, congestion and air quality issues.

- 2.7 The SA Report took account of the positive focus on sustainable travel in the Pre-Submission Local Plan, as it was a recurrent theme throughout the policies. Nevertheless, a potential / uncertain significant negative effect was still predicted due to the scale of growth in locations that are likely to attract car usage.
- 2.8 The proposed modifications should help to further mitigate negative effects as there are more specific mentions of the need to support bus routes, walking and cycling and 'other' modes of sustainable transport. This additional focus is more likely to mean that the residual impacts are not significant (but a degree of uncertainty still remains and monitoring of impacts will be important).

Built and natural environment

- 2.9 There is a specific modification proposed in response to the SA which seeks to minimise the effect of allocated employment site on the setting of a listed building 'Le Chateau'. This is already acknowledged and taken into account in the SA Report. The overall findings therefore remain the same.

Reasonable alternatives

- 2.10 There are no reasonable alternatives to the proposed minor modifications for the following reasons:
- Most are corrections in response to typographical or factual errors.
 - More substantive changes are policy revisions or additions in response to specific comments or evidence. There are no alternative suggestions.

Mitigation and enhancement

- 2.11 It is not considered necessary to recommend further amendments (particularly as no significant negative effects have been identified).
- 2.12 Furthermore, the modifications are being proposed partly for the reason of enhancing positives or minimising negatives.

Monitoring

- 2.13 Monitoring measures are set out within the SA Report. There is no need to propose additional monitoring measures as the appraisal findings remain virtually the same (and importantly, no significant effects have been identified as a result of the minor amendments).

3. Typographical errors

Introduction

- 3.1 It has been noticed that there are typographical errors in the SA Report. These relate to the employment growth alternatives. The three alternatives are initially introduced as follows in Section 4 of the SA Report:
- Alternative 1: The proposed approach
 - Alternative 2: Lower growth
 - Alternative 3: Higher growth.

- 3.2 However, the actual appraisal set out in Appendix IV of the SA Report refers to the preferred approach as alternative 2 and lower growth as alternative 1. This is a typographical error throughout the appendix and within the related paragraphs at section 4.4.1- 4.1.7. (likewise, these typographical errors have occurred in the non-technical summary).
- 3.3 For the avoidance of doubt, the sections where these alternatives are referred to incorrectly (in the SA Report) have been reproduced in **Appendix A** to this Addendum. The alternatives have been labelled correctly, but the actual appraisal text and findings otherwise remain exactly the same.

4. Responding to representations

- 4.1 A number of representations were made at the LPSD consultation which refer directly to the SA Report. The main comments have been drawn together and a response to each representation is made in **Appendix B** to this Addendum.
- 4.2 The majority of comments relate to the outcomes of the site appraisal process; with alternative scores suggested for specific sites. In the main, the suggested scores have not been accepted. This is because the site appraisal findings are correct in relation to the agreed methodology that was applied. A 'mitigation-off' approach to the appraisal was taken to ensure consistency in comparison. Likewise, detailed technical studies were not available for each site to confirm whether 'potential negative effects' would occur or not. However, the site appraisal findings are only one element of the decision making process, and can be supplemented by more detailed findings. Therefore, a negative score does not necessarily mean that a negative impact would occur.
- 4.3 Where factual errors have been identified, the scores have been amended accordingly. In summary these are as follows:

Site ref / name	SA Objective	SA Report score	Amended score
Site 8HS	SA20: Access to Convenience Store	Amber	Red
	SA8: Heritage	Red	Amber
	SA13: Education	Grey	Green
Site 10HA	SA16: Housing delivery	Green	Grey
Site 1HS	SA20: Access to Convenience Store	Green	Grey

**APPENDIX A: CHANGES TO CORRECT
TYPOGRAPHICAL ERRORS TO THE
Submission Draft SA REPORT
(January 2019)**

4.4 Summary of appraisal findings

Findings for the employment growth alternatives

4.4.1 Alternative 2 (lower growth) would not generate any significant effects, either positive or negative. However, it would achieve some minor benefits with regard to health and wellbeing and moderate effects with regard to support for the local economy. These positive effects could be achieved without notable effects upon environmental factors, and with good mitigation and enhancement, the residual effects across most sustainability topics would be neutral. For some factors, minor negative effects would be unavoidable and permanent, so negative effects would remain such as a loss of agricultural land and changes to the setting of heritage assets.

4.4.2 Alternatives 1 (proposed approach) and 3 (higher growth) present a different picture, as they would help to deliver strategic employment needs and would have more pronounced effects overall.

4.4.3 Alternatives 1 (proposed approach) and 3 (higher growth) are both predicted to have significant positive effects with regard to employment, tackling deprivation and health and wellbeing. For Alternative 3 (higher growth), this could be a major positive effect. However, positive effects would come at the expense of greater impacts upon the natural environment. For the most part, the effects would still not be significant, but they would be more notable than for Alternative 2 (lower growth). For example, there would be increased risk of flooding, and greater potential for impacts to landscape, cultural heritage and amenity.

4.4.4 There would also be likely to be effects upon traffic and congestion, which could potentially be significant in the short to medium term as a result of increased construction activities and trips to new employment sites, which would be difficult to fully mitigate. However, it should be possible to limit most sustainability effects on sensitive receptors by requiring effective mitigation and enhancement measures to be implemented. The effects for Alternative 3 (higher growth) on traffic and congestion would be potentially major though.

4.4.5 More notable effects are predicted with regards to biodiversity and soil for both Alternatives 2 (proposed approach) and Alternative 3 (higher growth), and for only Alternative 3 (higher growth), potential significant effects on landscape also.

4.4.6 Provided that a proactive and effective approach is taken to managing the development process, Alternative 1 (the proposed approach) is considered to be the approach which would most effectively meet the aims of the Plan. However, this is reliant upon necessary infrastructure improvements being delivered in advance of development being brought into use and on green infrastructure being protected and enhanced where necessary to mitigate impact upon multiple factors such as wildlife, water quality, flooding, landscape and cultural heritage.

4.4.7 Though alternative 3 (higher growth) could generate further positive effects with regards to the economy, it would generate more pronounced negative effects on traffic and congestion, and landscape (compared to Alternative 1).

APPENDIX B: SUMMARY OF REG19 CONSULTATION REPRESENTATIONS

Representation	AECOM Response
Environment Agency	
The SA should show awareness that some residential development can cause risks to groundwater.	Comments noted. It is considered unnecessary to amend the report findings though, as the risk to groundwater is considered to be low (and would be dealt with through the planning application process at individual sites). There are no specific issues identified for any of the allocated sites.
With relation to groundwater protection, it is suggested that mitigation measures during construction should be routine to ensure that effects are avoided.	It is expected that the planning application process would deal with such matters. Additional policy changes in the Plan would be helpful, but would not lead to a difference in the SA findings.
Natural England	
There are no comments directly upon the SA. However, the comments on the HRA are relevant, as this feeds into the SA findings. Without the assurance of suitable mitigation measures, the allocations are at risk of becoming undeliverable at project stage if the Habitats Regulations cannot be satisfied.	<p>The SA findings ought to reflect the uncertainty in relation to the HRA and mitigation.</p> <p>The SA Report does not currently discuss these matters. However, minor amendments are being proposed that seek to address these issues. The conclusions in the SA will therefore remain the same.</p>
Historic England	
No comments	N/A
Pegasus	
The methodology used to assess development sites within the Sustainability Appraisal is questionable particularly in relation to the Burrows Lane Site. The Burrows Lane Site was given an overall "high+" score for its Green Belt contribution even when it is acknowledged that it makes a low contribution on one of the three purposes. The evidence presented by the Council is not robust and requires a comprehensive update as part of the next stage of the local plan.	The scores relating to the Green Belt have been derived from the Green Belt Review (2018)
Member of the Public (EF0068/05)	
Whilst the Sustainability Appraisal does provide an assessment of the reasons for the allocation, safeguarding or discarding of sites (Table 6.3 - housing and employment), there is no clear assessment of the relative or comparative	Table 6.2 in the SA Report summarises the site appraisal process, which provides a comparison of the relative merits and constraints of each site. The rationale for selecting sites is set out in table 6.3.

<p>merits of the potential housing sites to determine why some housing sites are considered worthy of allocation and others safeguarded.</p>	<p>The decisions relating to the allocation, safeguarding or discounting of sites are related to the SA but a range of other factors.</p>
<p>Numerous members of the public</p>	
<p>Only 4 of the housing site options considered in Table 6.2 of the Sustainability Appraisal scored 'red' (negative impact) against 4 or more of the sustainability criteria. Of those, 8HA is the only one still being brought forward for future development. It follows that 8HA is the least sustainable housing site being allocated.</p>	<p>It is not the role of the SA to suggest what sites should be allocated and which should not. The SA provides a consistent and objective comparison of the relative merits and constraints of sites. This contributes to the decision making process, but is not the only factor. Therefore, sites that appear to perform 'the worst' are not necessarily always unsuitable for allocation. This is a planning judgement that the Council has to make.</p>
<p>Member of the public (EL0067/03)</p>	
<p>There are numerous discarded sites with only one or two negative indicators whilst sites with greater negativity have been Allocated or Safeguarded. This leads to question the purpose and validity of the SA given that so many negative indicators do not appear to deter allocating or safeguarding land.</p> <p>In specific relation to 8HS, SA3 is marked as unlikely to have significant affects to air quality, however the IDP has no solution to this, so how can this possibly be marked neutral. SA6 is marked as potentially negative effects which could be mitigated. This cannot be marked as amber given the unknown conditions and the long history of flooding in the area.</p>	<p>It is not the role of the SA to suggest what sites should be allocated and which should not. The SA provides a consistent and objective comparison of the relative merits and constraints of sites. This contributes to the decision making process, but is not the only factor. Therefore, sites that appear to perform 'the worst' are not necessarily always unsuitable for allocation. This is a planning judgement that the Council has to make.</p> <p>With regards to 8HS, the findings are based upon agreed criteria from scoping. These are applied consistently and are indicative high level findings. No changes are considered necessary.</p>
<p>Member of the public (EL0117 EL0117/36)</p>	
<p>St Helens is ranked as the 36th most deprived local authority in England. The relative position of the Borough has deteriorated since the 2010 Index of Deprivation.</p> <p>The English Indices of Deprivation 2015 (30/9/15) places St Helens 25th. Why hasn't this statistic been stated (rather than 36th as per the 2010 report)? Note that the St Helens borough is also located next to Knowsley, which is ranked 2nd (with Liverpool 4th). Surely more focus needs to be given to improving facilities and services (e.g. education and health) to the St Helens residents, rather than generating further pressure on already inadequate and generally poor services through the development of additional housing estates?</p> <p>Same issue raised here: EL0117/36</p>	<p>It is not the role of the SA to set the strategy for the Borough.</p> <p>The SA does however set objectives that seek to reduce poverty and social exclusion, to improve health and inequalities, and to improve access to services. In this respect, the Plan (and reasonable alternatives) has been tested as to the extent to which it would achieve these objectives.</p> <p>The reference to St. Helens being the 36th most deprived local authority is accurate and is taken from the most up to date 2015 Index. St. Helens was ranked 51st in the 2010 Index. The SA Framework identified deprivation as a key issue to be addressed.</p>

Member of the Public (EL0138/03)

Objects to factual inaccuracies, inconsistencies and statements in the Sustainability Appraisal.

1. Appendix A of the SA AECOM ID:75 indicates that development of the land (8HS) is unlikely to have significant impacts upon Objective SA3 (Air Quality). However it is clear that the development of 8HS will generate new traffic and will require a new roundabout from the A580 to serve the development which will lead to stationary traffic with idling engines.

2. SA6 regarding Floodrisk indicates that development of AECOM ID:75 (8HS) is likely to have a negative impact however goes on to state that such an impact can be mitigated this is despite a localised floodrisk that not only impacts the development site but also Bleak Hill School and Hamilton Road.

3. SA12 regarding Improving Health indicates that the development of AECOM ID:75 (8HS) is likely to have a positive affect on health given that there is a Medical Centre (Eccleston) some 529m away. However the medical centre is located much further away at 1km from the site and is planning on relocating to 1.5km away. This will undoubtedly lead to many short car journeys, increasing congestion and air pollution and thus having a negative impact on health.

4. SA13 regarding Improving Education indicates that there would be neutral impact of AECOM ID:75 (8HS) however the local secondary school (some 550m away) is already at capacity and a further school in the area would only add to existing traffic congestion and associated pollution. The impact of 8HS on SA13 should therefore be negative.

5. SA14 regarding Improving Employment Opportunities identifies that there are employment opportunities in farming at Catchdale Moss. Considers that this is unrealistic given that the development of 60 ha of agricultural land for 1,200 new homes will remove farming jobs. The nearest employment prospects are over 6km away with no connecting public transport service which will promote car dependency and increase traffic particularly at Windle Island.

1. The classification / scoring is based upon set thresholds and criteria in the site appraisal framework. This gives an indication of whether significant effects would occur or not, but is not a final prediction. The effects are dependent upon the details of a development itself. Generating traffic does not in itself mean that significant effects on air quality (particularly in the AQMA, which is a focus of this criterion) would occur.

2. The appraisal outcome is based upon the agreed thresholds in the appraisal framework. For those sites where only part is at risk of flooding, it is considered that potential negative effects are avoidable / can be mitigated. Again, this depends upon scheme details, but at this high level, a site that is not entirely at risk of flooding is justified as an amber score rather than red.

Measurement was based upon distance at the time of assessment for consistency. Was not aware of relocation plans.

4. SA13 does not take account of capacity factors. This is a recognised weakness in the criterion. In terms of distance though, the findings are correct and therefore the score remains the same.

5. Catchdale Moss is categorised as a 'key employment area'. The criteria measures distance to the nearest opportunities and is scored accordingly. This does not mean that all new homes here would be served by such opportunities. There are other key employment areas within 5km of the site also, so a neutral score is appropriate.

6. The score is based upon agreed criteria and is correct. Agree that larger sites will have varying degrees of accessibility though.

7. Agree that the score does not reflect real physical / safety barrier. **A negative score should be recorded rather than a positive for SA20.**

<p>6. SA19 regarding reducing the need to travel indicates that the development will have a positive effect given its location 85m of a local bus stop. Objector states that the bus stop is a low frequency service and much of the development site (8HS) will lie 1 kilometer from the bus stop.</p> <p>7. SA20 regarding access to town, district and /or Local centres indicates that the site benefits from a local convenience store within 45m. Objector states that the shop in question is on the northern side of the A580 and is not easily nor safely accessible. The development cannot score more than amber given the circumstances.</p>	
<p>Nexus Planning (on behalf of Storey Homes)</p>	
<p>SA1. It is considered that an amber score should be given rather than red.</p>	<p>SA1. The appraisal criteria applied is based upon fixed criteria to allow for a consistent comparison of sites. The score is merely to identify the potential constraints and merits of sites, rather than to determine precise impacts. A red score is recorded as the site contains a local wildlife site. It is acknowledged that with mitigation, these effects can be avoided.</p>
<p>SA8. Site is scored red due to overlapping with an area of archaeological interest. Disagree.</p>	<p>SA8. <u>The score has been recorded red in error and should be amber</u> (consistent with all other sites scored this way).</p>
<p>SA9. The SA scores a potential negative effect with regards to open space. However, an indicative masterplan shows that major open space will be provided.</p>	<p>SA9. To ensure consistency, new open space provision was not factored into the assessment as a criterion. Therefore, the scores remain the same for the purposes of the SA. However, it is recognised that strategic development can deliver improvements, and this is a factor that is taken into account in the decision making process.</p>
<p>SA13. The site could provide new facilities on site, which would warrant a positive effect.</p>	<p>SA13. <u>As the site is likely to deliver more than 500 dwellings, the score should be a positive (green)</u></p>
<p>SA14. The site has excellent access to the A580 and therefore will promote access to employment opportunities. It should therefore be scored green.</p>	<p>SA14. The site is not within 1.2km of a major employment area. Therefore a neutral score remains.</p>

Comments are raised about specific scores in the SA and how these relate to criteria in the GB review.

1. For sites 3HS and 4HS, there is a view that criteria SA3 should be negative rather than neutral.
2. For 3HS criteria SA9 should be negative rather than positive as development would result in the loss of recreational space.
3. Suggestion that site 4HS should score a red for SA8 (rather than amber). This is based on the fact that Historic England have raised objections.
4. There is potentially functionally linked habitat at site 1HS. The SA score for SA2 should therefore be amber and not neutral.

1. The scores within the SA are based upon set criteria and relate to potential effects in terms of air quality. Both the GB review and the SA are pieces of evidence that have informed the decision making process.
2. SA9 deals with access to open space. In this respect the site is scored correctly.
3. The SA score is considered appropriate. Though there is objection and uncertainty, this does not mean that mitigation isn't possible. A red classification would equate to heritage assets being likely to be lost or the setting of an asset in an open area being significantly affected. The site does not fit this category.
4. The SA utilised a proximity based method to ensure consistency in comparison of sites. In this respect, the neutral score is correct. The HRA and GB review are separate pieces of evidence, which are also important in the decision making process. The Council has had access to all three (plus other) evidence studies to inform its decisions.

Frost Planning (on behalf of English Land)

Paragraph 4.2.13 fails to acknowledge site 9EA benefits an extant planning permission for B1/B2/B8 uses.

ID104 E13 in the assessment table (page 37 in the SA Report) is inconsistent with the Technical Appendix A. Furthermore, there is no tangible evidence/risk to biodiversity, landscape sensitivity, or distance to prominent ridgeline. Also, the development of this site for employment uses will clearly support the local economy, reduce poverty and social exclusion and minimise the need to travel (in contrast with the table which suggests a 'neutral' impact only).

Para 4.2.13 does state that site 9EA has an extant planning permission.

We find the summary in table 6.1 to be consistent with the correlating proforma in Technical Appendix A.

The scores associated with biodiversity and landscape have been identified correctly according to the site assessment criteria. The site appraisals are a high level assessment tool to identify the relative merits and constraints. This does not represent a detailed assessment of impacts.

The criteria for addressing inequalities is related to the proximity of the most deprived areas to the potential employment site. In this respect, the site scores a 'neutral' effect. This does not mean that measures could not be taken to try and strengthen links between such areas though. At this high level assessment stage though, the criteria and outcome score are considered to be appropriate.

Pegasus (on behalf of I Birchall & D Birchall)

The methodology used to assess development sites within the Sustainability Appraisal is questionable particularly in relation to the Burrows Lane Site. The Burrows Lane Site was given an overall "high+" score for its Green Belt contribution even when it is acknowledged that it makes a low contribution on one of the three purposes. The evidence presented by the Council is not robust and requires a comprehensive update as part of the next stage of the local plan.

The SA does not utilise Green Belt function as a site appraisal criteria.

Turley (on behalf of Harworth Estates Ltd)

In terms of the SA, we do not agree with some of the findings.

- do not agree with the SA Score for SA Objective SA1. Development here is currently categorised as having likelihood to generate negative effects due to it containing 288m of Local Wildlife Site (LWS) (Sutton Brook) and is 89m to the nearest TPO. However, the majority of the development at the site will be placed at an appropriate distance from the Brook as to avoid harmful impacts, and any development that will be nearby to the Brook will be appropriately mitigated for. There will be ecological enhancement and management works at the site, including the Brook, which will offset any impacts development may have on the LWS. As the site is 89m from the nearest TPO it is highly unlikely that development here will have any impact on the tree(s) as the development will be contained solely within the site boundary. However, appropriate mitigation will be put in place if there is a risk of impact and it is therefore recommended that the site should be considered 'Amber' in the SA as any potentially negative effects can be mitigated against.

- do not agree with the SA Score for SA Objective SA2 given that the land at Moss Nook currently comprises a derelict site and so the redevelopment for residential dwellings will promote positive effects to the land quality and as such should score 'Green' 2 in the SA (as opposed to 'Grey' 3).

To summarise, the recent technical studies confirm that there are no environmental, physical or social constraints that would restrict

SA1. The site appraisal framework is a high level assessment tool that identifies the relative constraints and merits of sites. This does not take account of the exact location of development or detailed proposals for mitigation (hence the red score).

SA2 is determined on the basis of the amount and quality of agricultural land on site. There are only negative or neutral effects for this criterion as development will not lead to improvements with regards to agricultural land. A greys score is correct.

future development on the site. As in accordance with the principle of development that has been approved for the site, the SA demonstrates how development of the site will promote many positive effects on the environment and social wellbeing.

Turley (on behalf of Peel)

Haydock Point North:

- SA1. Biodiversity: Detailed ecological surveys reveal that the site is not of high biodiversity value.
- Air quality: Modelling demonstrates that there will be no significant effects with regards to traffic.
- Local Economy: The SA downplays the economic benefits of the site.

Haydock Point South:

An alternative appraisal is presented.

- SA1. Biodiversity: [Suggest amber rather than red.](#)
 SA2. Land quality: [Suggest amber rather than red.](#)
 SA3. Air quality: [Suggest amber rather than red.](#)
 SA4. Sustainable water resources: [Suggest green rather than grey.](#)
 SA5. Climate change: [Agree](#)
 SA6. Flooding: [Suggest grey rather than amber](#)
 SA7a. Landscape: [Agree](#)
 SA7b. Prominent ridgeline: [Agree](#)
 SA8. Cultural Heritage: [Suggest grey rather than amber](#)
 SA15. Economy: [Agree](#)
 SA17. Poverty: [Agree](#)
 SA19. Travel: [Agree](#)

Haydock Green

Peel disagrees with four outcomes in the site appraisal for Haydock Green.

SA1 should be amber and not red (mitigation is possible and will avoid significant effects)
 SA9 should be green and not amber.
 SA15 should be green and not amber
 SA16 should be green and not amber

LPSD Site 2ES (Haydock Point North)

The site assessment is based upon agreed criteria and did not have the benefit of detailed surveys and modelling. For consistency, the sites are all scored on the basis of the same information.

Site GBP 036 (Haydock Point South)

The scores in the SA are derived from the site appraisal framework in Appendix II of the SA Report. All scores are correct in this context.

SA1. The SA does not benefit from detailed ecological surveys for each site. To ensure consistency, the criterion is based purely on the presence of known wildlife constraints. In this respect, a red score is correct.

SA2: The criterion is based upon the amount and quality of agricultural land present. A red score is correct on this basis.

SA3. The appraisal criterion is a high level measure to identify potential constraints. In this case HGV generating development within an AQMA equates to a red score. The appraisal did not have the benefit of detailed monitoring, and needs to ensure that sites are compared using the same information.

SA4. Only two scores are possible under this criterion (grey and amber).

SA6. 2% of the site is within flood zone 2/3, which means an amber score is recorded in line with the site appraisal framework. It is acknowledged that this is a limited constraint in the context of the site though.

SA8: There is a listed building on site (Dean School Cottage). However, it is acknowledged that significant effects could be avoided hence an amber rather than red score.

Former LPP0 site HA10 (Haydock Green)

	<p>SA1. The site appraisal was undertaken without the benefit of detailed surveys, and to ensure consistency presents a 'mitigation-off' appraisal. A red score is correct in this context.</p> <p>SA9. The appraisal criteria stipulates that potential negative effects are recorded in the presence of historic assets / features. This is an appropriate approach that accords with the precautionary principle. It should be remembered that this is a 'mitigation-off' appraisal.</p> <p>SA15. Disagree.</p> <p>SA16. The site was identified in the Green Belt Review as having deliverability issues, hence the amber score (in accordance with the SA site appraisal framework).</p>
<p>Pegasus Planning (On behalf of Wallace Land Investments) Pegasus Planning (On behalf of Redrow)</p>	
<p>A number of assessed sites have different red line areas to those for the proposed allocations, therefore some of the scoring is not completely accurate.</p> <p>There are a number of discrepancies in the scoring for the site at Mill Lane, Rainhill (HS23).</p> <p>There are a number of discrepancies in the scoring for the site at Burrows Lane, Eccleston (GBS_108).</p> <p>With regards to site assessment outcomes:</p> <p>Site 6HA</p> <p>SA16 should be red and not grey as deliverability could be an issue.</p> <p>Site 8HA</p> <p>SA2 - Disagree with amber score. Grade 1 should be red no matter what size of site</p> <p>Site 10HA</p> <p>SA16 should be grey not green.</p> <p>Site 1HS</p> <p>SA20 should be grey not green.</p> <p>Site 2HS</p>	<p>The appraisal findings are based upon the red-line boundaries available at the time of assessment.</p> <p>The site appraisal is not meant to result in a score and ranking for each site. It is to identify high level constraints and opportunities for each site. It should be acknowledged that mitigation can have a bearing on the overall effects of a development.</p> <p>Site 6HA</p> <p>Deliverability scores have been derived from the details in the SHLAA, which suggests development could occur within the plan period. Score is correct.</p> <p>Site 8HA</p> <p>The criteria and thresholds were presented for comment at scoping, but no such issues were raised. The approach taken is considered to be appropriate.</p> <p>Site 10HA</p> <p>Deliverability scores have been derived from the details in the SHLAA (2017), which state development in years 6-15. <u>Amend from green to grey.</u></p> <p>Site 1HS</p> <p>The SA covers a different red line boundary, which brings a potential access point closer to a</p>

<p>SA16 should be grey not green</p> <p>Site 3HS</p> <p>SA13 should be grey not green for primary school</p> <p>SA16 should be grey not green as not available in first 5 years</p> <p>Site 6HS</p> <p>SA1 should be amber not red as the wildlife site is adjacent not on site.</p> <p>SA13 should be grey not green for primary school</p> <p>Site 8HS</p> <p>SA16 should be grey not green</p> <p>Land north of the M62 and south of Mill Lane</p> <p>SA1 - Red line area does not include the TPOs. SA2 - Detailed survey shows mostly 3b. SA7 should be amber not red as mitigation can be employed. SA8 - Should be amber not red.. listed assets are not in red line boundary and also mitigation can be employed. SA9 - PROW should be positive not amber SA12 - Disagree with the distance to leisure facilities, should be amber not red. Golf club nearby. SA16 - Should be green not grey. SA20 - Should be green not grey - the petrol station shop does have a small range of products.</p> <p>Burrows Lane - Eccleston</p> <p>SA 1 - should be grey not red as the site boundary has changed. SA7 - Landscape assessment of their own says amber not red. SA9 - should be green as it will not affect PROW (instead of grey) - this isnt what the criteria says though. SA16 - Should be green not red.</p>	<p>convenience store. However, the large nature of the site means that much of the site would not be accessible within 400m, so the <u>score should be amended from green to grey.</u></p> <p>Site 2HS</p> <p>Deliverability scores have been derived from the Green Belt review (see table 5.4 of the GB review 2018 for a summary).</p> <p>Site 3HS</p> <p>Check distance to school</p> <p>Deliverability scores have been derived from the Green Belt review (see table 5.4 of the GB review 2018 for a summary).</p> <p>Site 6HS</p> <p>SA1 - The wildlife site is within the assessed site. The boundary has been amended at the allocation stage to reflect this constraint. Therefore, the red score within the SA Report was correct.</p> <p>SA13 – Precise access point was unknown at time of appraisal. Measurement was taken from centre of site and access presumed possible by foot to Wordsworth avenue and Shakespeare Road (which is less than 400m and hence green).</p> <p>Site 8HS</p> <p>Deliverability scores have been derived from the Green Belt review (see table 5.4 of the GB review 2018 for a summary).</p> <p>Former LPPO Site HS23 (Land north of the M62 and south of Mill Lane)</p> <p>SA1 – Assessment was based on the submitted red line boundary.</p> <p>SA2 – Detailed studies were not taken into account (or available) at the time of assessment. To ensure consistency, this would have to be done for all other sites.</p> <p>SA7 – Mitigation strategies have not been taken into account at the time of assessment.</p> <p>SA8 – Assessment was based on the submitted red line boundary. Mitigation strategies have not</p>
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been taken into account at the time of assessment.

SA9 – Amber score has been recorded as potential for severance exists. This is consistently applied for other sites too. Mitigation not taken into account.

SA12 – Private golf clubs are not included in the assessment of leisure facilities.

SA16 - Deliverability scores have been derived from the Green Belt review (see table 5.4 of the GB review 2018 for a summary).

SA20 – For the purposes of the assessment, the petrol station is not classified as a convenience store. It has been mentioned for context.

Former LPPO Site HS08 (Burrows Lane – Ecclestone)

SA1 – Assessment was based on the submitted red line boundary.

SA7 – Detailed studies were not taken into account (or available) at the time of assessment. To ensure consistency, this would have to be done for all other sites.

SA9 – Scoring in the SA Report correct.

SA16 - Deliverability scores have been derived from the details in the SHELAA.

APPENDIX C: SCREENING THE MINOR MODIFICATIONS

Additional modifications to the Proposed Local Plan Submission Draft 2020 – 2035 (LPSD)

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

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strikethrough ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA
AM001	i List of Appendices			Retitle appendix 3 as " Aims and Objective and Policies <u>Strategic Aims, Objectives and Policies</u> "	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM002	ii List of Tables and remainder of document			There are 2 table numbers 4.7. Renumber the second table 4.7 and table 4.8 to table 4.8 and 4.9 respectively in all references throughout the document.	Typographical correction	None. Typographical changes do not change plan direction or policy content.
	6, 129, 142, 146, 147 & 163			Remove double page numbers at foot of each of these pages.	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM003	1	1.3.1		Revise 1.3.1 second bullet as follows: "...the Bold Forest Park Area Action	Typographical	None. Typographical changes do not

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strike through ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA
				Plan 2016 2017 , which sets out a strategy for the sustainable development and regeneration of several communities and adjacent countryside in the southern part of the Borough.”	correction	change plan direction or policy content.
AM004	2	1.3.4		National legislation also allows neighbourhood plans to be prepared for specific parts of the Borough. To date, no neighbourhood plans have been prepared in St.Helens Borough. Government policy requires <u>that</u> any neighbourhood plan that is prepared to be in conformity with should not undermine the strategic policies of the Local Plan [retain footnote].	To more accurately reflect the wording of the NPPF.	None. Change only provides clarity about the national policy context.
AM005	2	1.3.5		The policies of the Local Plan replace all the policies in the St.Helens Local Plan Core Strategy 2012 and the previously ‘saved’ policies of the St.Helens Unitary Development Plan (UDP) 1998. No part of that the Core Strategy or the UDP documents will	Typographical correction	None. Typographical changes do not change plan direction or policy content.

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strike through ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA
				remain extant from adoption of this Plan.		
AM006	2	1.3.6		None of the policies in the Joint Merseyside and Halton Waste Local Plan 2013 or Bold Forest Park Area Action Plan 2016 <u>2017</u> will be replaced by this Local Plan. These documents will remain fully in place beyond adoption of this Plan.	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM007	2	footnote 1		National Planning Policy Framework, 2018 <u>2019</u> – paragraph 29.	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM008	3	1.6.1		A range of existing and emerging policy documents have influenced the development of the St.Helens Borough Local Plan. The National Planning Policy Framework (NPPF) that was updated in 2018 aims to promote sustainable development and growth while making the planning system less complex and more accessible. The Local Plan has been	The NPPF has been subject to various changes as the Plan has progressed (i.e. not just those published in 2018).	None. Modifications are for clarity / accuracy and do not affect the policies.

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strike through ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA
				prepared to accord with the tests of 'soundness' set out in the NPPF. It has also had regard to the Government's online Planning Practice Guidance.		
AM009	6	Chapter 2 heading		Insert heading as follows: " <u>2. St Helens Borough Profile</u> "		None. Changes do not change plan direction or policy content.
AM010	10	2.9.3		Landscape improvement programmes have been undertaken in a number of locations, for example Bold Forest Park in the south of the Borough, Carr Mill Dam and Stanley Bank in the north. All these sites have had significant investment that has improved access to allow <u>enabled improved levels of</u> public access for walking, cycling and horse riding. The Mersey Forest and related initiatives have played a major role in securing the environmental regeneration of	For clarity	None. Change is for clarity only and is background information rather than policy content.

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strike through ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA
				parts of the Borough.		
AM011	16	4.3.1		The National Planning Policy Framework (NPPF) sets out a presumption in favour of sustainable development. Policy LPA01 supports this presumption and all development within the Borough will be considered against this policy.	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM012	18	Policy LPA02, paragraph 8e)		e) requiring development to support healthy lifestyles in accordance with Policy LPD <u>A</u> 11.	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM013	22	4.6.8		The Council aims to ensure that the housing and employment needs of St.Helens are met in full within the Borough. Land for new development will be identified in <u>New development will be guided towards</u> sustainable locations, generally within, on the edge of, or close to Key Settlements (insofar as this is acceptable and practicable). These decisions <u>This approach</u> will take account of:	For clarity	None. The modifications do not change the plan approach or any policies.

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strike through ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA
				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.		
AM014	29	Policy LPA04, paragraph 1c)		<p>c) ensure the necessary infrastructure is provided to support business needs (see <u>Policy LPA08</u>);</p> <p>d) Support the creation of and expansion of small businesses; and</p> <p><u>e) Support businesses and organisations in the economic recovery and renewal from the Covid19 Pandemic.</u></p>	Typographical correction	<p>Typographical changes do not change plan direction or policy content.</p> <p>Additional changes provide additional support for small businesses and also recognise the need to respond to the Covid 19 pandemic. Whilst positive, no specific measures are outlined, and so significant effects are unlikely.</p>

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strike through ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA
AM015	29	Policy LPA04, paragraph 2		2. The Council will aim to deliver a minimum of 215.4 <u>219.2</u> hectares of land for employment development between 1 April 2018 and 31 March 2035 to meet the needs of St.Helens Borough.	Factual correction	None. The modifications do not change the plan approach or any policies.
AM016	31	Table 4.1, entry for site 9EA (land to the west of Sandwash Close, Rainford)		Change appropriate uses listed in column 4 for site 9EA to <u>B1</u> , B2, B8	To correct a typographical error - the extant planning consents for this site refer to B1, B2, B8 uses (B1 was missed off from the list).	None. Typographical changes do not change plan direction or policy content.
AM017	31	footnote 15		Sites 2EA, <u>3EA, 9EA and 10EA</u> and 6EA are subject to existing planning permissions for employment development	To provide updated information.	None. For information only.
AM018	33	footnote 20	as there is evidence to suggest that take-up rates since than <u>then</u> have been suppressed by a restricted land supply.	Typographical correction	None. Typographical changes do not change plan direction or policy content.

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strike through ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA
AM019	34	Paragraph 4.12.8		Once an allowance of 2.7ha for take up and 9.34 5.46 ha for the existing developable employment land supply in the Borough has been applied the residual requirement is 215.4 219.2 ha.	Factual correction	None. Changes are to correct errors. No changes to the supply of employment land are proposed.
AM020	34	Table 4.4 "Residual Employment Land Requirement - 2018-2035"		Change existing supply of developable employment land (31 Mar 2018) from 9.3 to 5.46 hectares . Also, change the Total Residual Requirement from 215.4 to 219.2 hectares .	Factual correction	None. Changes are to correct errors. No changes to the supply of employment land are proposed.
AM021	34	Paragraph 4.12.2	identified in Table 4.4 (totalling 215.4 219.2 ha) cover a different time period to the.....	Factual correction	None. Changes are to correct errors. No changes to the supply of employment land are proposed.
AM022	37	footnote 22		Site 2EA 6EA is the subject of an existing planning permission for employment related development granted in April 2017 (reference P/2016/0608/HYBR).	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM023	38	Policy LPA04.1"Strategic		Development within Strategic Employment Sites will be required to,	Typographical	None. Typographical changes do not

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strike through ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA
		Employment Sites", criterion 4		subject to compliance with Policy LPA08, <u>to</u> provide or make financial contributions towards the provision, expansion and / or <u>any</u> enhancement of transport infrastructure (including road, public transport, cycling and pedestrian infrastructure) and / or other infrastructure to serve the needs of the development.	correction	change plan direction or policy content.
AM024	38	Policy LPA04.1"Strategic Employment Sites", criterion 5		within any other allocated employment site, must address the site specific requirements set out in Appendix 5 (in the case of sites 1EA,6EA,2EA and 8EA) and (in the case of site 7EA) Policy LPA10 (in the case of site 7EA).	For clarity	None. Relates to document structure rather than policy content.
AM025	42	Paragraph 4.18.1	The requirement of 9,234 486 dwellings per annum set out in Policy LPA05 is designed to.....	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM026	45	Table 4.6		o) Required capacity of sites with 20% increased allowance for sites to be removed from the Green Belt (site allocations 5HA to 15HA inclusive) (to allow for contingencies e.g.,	Typographical correction	None. Typographical changes do not change plan direction or policy content.

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strikethrough ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA										
				infrastructure provision, delays, lead-in times to start of housing delivery etc.)												
AM027	45	Footnote 32		This figure has been derived by deducting the expected delivery from SHLAA sites between 1 April 2017 and 31 March 2020 (<u>see Table 5.3 in the 2017 SHLAA</u>) from the overall SHLAA supply identified in row e (7817 units).	For clarity	None. Relates to document structure / facts rather than policy content.										
AM028	46	Footnote 34		This total supply figure is derived by adding the residual SHLAA capacity (row m) to the adjusted capacity from the sites removed from the Green Belt (row <u>ep</u>).	Typographical correction	None. Typographical changes do not change plan direction or policy content.										
AM29	41	Table 4.5		<table border="1"> <thead> <tr> <th rowspan="2">Site ref.</th> <th colspan="2">Indicative site capacity (new dwellings)</th> <th rowspan="2">Total</th> </tr> <tr> <th>Before 31.03.35</th> <th>After 31.03.35</th> </tr> </thead> <tbody> <tr> <td>2HA</td> <td>400 <u>382</u></td> <td>422 <u>140</u></td> <td>522</td> </tr> </tbody> </table>	Site ref.	Indicative site capacity (new dwellings)		Total	Before 31.03.35	After 31.03.35	2HA	400 <u>382</u>	422 <u>140</u>	522	Slight tweaks to the estimated number of units to be delivered during and post Plan period, due to some updates to the build out rates and lead in time	The effects predicted in the SA Report remain valid, but the extent of these within the plan period would be slightly different for 4HA and 10HA in the plan period. For example, the full
Site ref.	Indicative site capacity (new dwellings)		Total													
	Before 31.03.35	After 31.03.35														
2HA	400 <u>382</u>	422 <u>140</u>	522													

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strikethrough ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA																								
				<table border="1"> <tr> <td>4HA</td> <td>480 360</td> <td>2508</td> <td>2,988</td> </tr> <tr> <td></td> <td></td> <td><u>2628</u></td> <td></td> </tr> <tr> <td>5HA</td> <td>520 472</td> <td>49 97</td> <td>569</td> </tr> <tr> <td>9HA</td> <td>350 352</td> <td>0</td> <td><u>352</u></td> </tr> <tr> <td>10HA</td> <td>802 585</td> <td>0 217</td> <td>802</td> </tr> <tr> <td>Totals</td> <td>4085 3684</td> <td>2955 3358</td> <td>7040 7042</td> </tr> </table>	4HA	480 360	2508	2,988			<u>2628</u>		5HA	520 472	49 97	569	9HA	350 352	0	<u>352</u>	10HA	802 585	0 217	802	Totals	4085 3684	2955 3358	7040 7042	assumptions for some of the sites. Please see the Housing Need and Supply Background Paper Appendix 1 for an updated housing trajectory as of 31.03.2020.	extent of agricultural land loss would not take place during the plan period, but this action would be put in motion. The positive effects associated with housing growth would still remain significantly positive overall, but on a site specific basis, the benefits are slightly less. The long term effects remain the same.
4HA	480 360	2508	2,988																											
		<u>2628</u>																												
5HA	520 472	49 97	569																											
9HA	350 352	0	<u>352</u>																											
10HA	802 585	0 217	802																											
Totals	4085 3684	2955 3358	7040 7042																											
AM030	47	Table 4.7	New footnote to be added next to Allocated Site title	<u>Inclusive of Green Belt allocations only.</u>	For clarity.	None. For clarity on calculations only.																								
AM031	47	Table 4.7	New footnote to be added next to Other Supply title	<u>SHLAA discounted average yearly supply..</u>	For clarity.	None. For clarity on calculations only.																								

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strike through ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA
AM032	50	Policy LPA06 "Safeguarded Land"		<p>1. The sites identified as Safeguarded Land on the Policies Map have been removed from the Green Belt in order to meet longer term development needs well beyond the Plan period. Such Safeguarded Land is not allocated for development in the Plan period. The future uses that the sites are safeguarded for are listed in Tables 4.7 and 4.8 4.8 and 4.9.</p> <p>2. Planning permission for the development of the safeguarded sites for the purposes identified in Tables 4.7 and 4.8 4.8 and 4.9 will only be granted following a future Local Plan review that proposes such development. Accordingly, proposals for housing and employment development of safeguarded sites in the Plan period will be refused.</p> <p>3. Other forms of development on Safeguarded Land will only be permitted where the proposal is:</p> <p>a) necessary for the operation of existing permitted use(s) on the land;</p>	Typographical correction	None. Typographical changes do not change plan direction or policy content.

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strike through ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA
				<p>or</p> <p>b) for a temporary use that would retain the open nature of the land and would not prejudice the potential future development of the land for the purposes stated for each site in Tables 4.7 and 4.8 4.8 and 4.9.</p> <p>4. Development on any other site that would prevent or limit development of Safeguarded Land for its potential future uses identified in Tables 4.7 and 4.8 4.8 and 4.9 will not be permitted.</p>		
AM033	50	Table 4.7		Rename table 4.7 as table 4.8	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM034	51	Table 4.8		Rename table 4.8 as table 4.9	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM035	51	Table 4.8		The Housing Total on this table is incorrect and should read 3,096 and	Factual correction	None. Typographical changes do not

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strikethrough ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA
				not-2,644		change plan direction or policy content.
AM036	52	Paragraph 4.24.1		In accordance with Policy LPA02, the sites listed in Tables 4.7 and 4.8 <u>4.8 and 4.9</u> have been safeguarded to meet potential long term development needs. Whilst they have been removed from the Green Belt, they are not allocated for development before 2035. Their purpose is to ensure that the new Green Belt boundaries set by this Plan can endure well beyond 2035. The reasons why specific sites are safeguarded rather than allocated for development before 2035 are set out in the St.Helens Green Belt Review 2018. The safeguarded sites are protected from other forms of development that would prevent or significantly hinder their future development for the uses identified in Tables 4.7 and 4.8 <u>4.8 and 4.9</u> . This is to ensure that, potentially, they could be used for these purposes in	Typographical correction	None. Typographical changes do not change plan direction or policy content.

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strike through ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA
				the future.		
AM037	52	Paragraph 4.24.2	of the safeguarded sites for the purposes in Tables 4.7 and 4.8 <u>4.8 and 4.9</u> will only be acceptable if a future	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM038	52	Paragraph 4.27.4	 safeguarded for housing is 2,644 <u>3,096</u> dwellings. To this can be added the indicative post-2035 delivery of 2,995 dwellings projected on the allocated housing sites 2HA, 4HA, 5HA, <u>and 6HA</u> (see Policy LPA05,	Factual and typographical correction	None. Typographical changes do not change plan direction or policy content.
AM039	54	Policy LPA07: "Transport and Travel", criterion 2		All proposals for new development that would generate significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement, <u>the scope of which must be agreed by the Council.</u>	For clarity.	Clarifying that the scope of the TA must be agreed by the Council will not lead to different conclusions with regards to the SA. The requirement to prepare a TA is already noted as

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strike through ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA
						positive.
AM040	55	Policy LPA07: "Transport and Travel", criterion 4		4. To minimise air and noise pollution and carbon emissions, non-residential forms of development that would generate a significant amount of transport movement by employees or visitors must be supported by suitably formulated Travel Plans. <u>Conditions and/or legal agreements will be used to ensure that Travel Plans submitted in such cases are fully implemented and monitored.</u>	To include requirement for travel plans to be implemented, in line with the comments of Highways England.	The addition is positive, as it offers a greater degree of certainty that measures will be put into place to support more sustainable forms of travel. The SA already identifies positive effects for LPA07 in relation to criterion 4. The significance of effects will remain the same.
AM041	55	Policy LPA07: "Transport and Travel", criterion 6		6. Direct access from new development on to the Strategic Road Network will only be permitted <u>as a last resort</u> , where agreed by Highways England <u>and where the necessary levels of transport accessibility and safety could not be more suitably provided by other</u>	In the interests of clarity, and to accord with the comments of Highways England.	None. Clarification does not change the principle of the criterion or how it is likely to be applied.

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strikethrough ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA
				<u>means.</u>		
AM042	57		New paragraph 4.27.8A	<p><u>“Proposed Major Road Network As part of the Transport Investment Strategy published in 2017, the Government committed to creating a Major Road Network (MRN). Draft proposals were issued for consultation, outlining how a new MRN would help the Government deliver a number of objectives, including supporting housing delivery and economic growth. The creation of an MRN will allow for dedicated funding from the National Roads Fund to be used to improve this middle tier of the busiest and most economically important local authority ‘A’ roads. Parts of the A58 and A570, and the whole of the length of the A580 which falls in St Helens, have been proposed for inclusion in the MRN.</u>”</p>	To include reference to the proposed major road network in line with the comments of Highways England.	None. Provides clarity but does not add policy content.

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AM043	60	Paragraph 4.30.6		<p>The Council has no proposals, at the time of adoption of this Plan, to introduce a Community Infrastructure Levy (CIL). This means that in most cases developer contributions will be sought via planning obligations entered into under Section 106 of the Planning Acts. The National Planning Practice Guidance sets out <u>further details of the circumstances in which planning obligations can be used to fund infrastructure provision.</u> various circumstances in that ‘tariff style’ planning obligations should not be sought from small scale and / or self-build development. For example, contributions should not be sought from developments of 10 dwellings or less, and that have a maximum combined gross floorspace of no more than 1,000m² (gross internal area). The Council will comply with the up-to-date version of national guidance in operating Policy</p>	For clarity.	None. Typographical changes do not change plan direction or policy content.

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				LPA08.		
AM044	61	Paragraph 4.30.7	has prepared a the St.Helens Infrastructure Delivery Plan 2019 .	Grammatical correction and for clarity.	None. Typographical changes do not change plan direction or policy content.
AM045	63	Paragraph 4.33.2	Countryside In and Around Towns_undertaken with the Countryside Agency	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM046	64	Paragraph 4.33.3	sports grounds, amenity G reenspace, play areas, allotments, cemeteries and church yards. It also includes natural and semi-natural open spaces that is are less-intensively managed.....	Grammatical correction and for clarity.	None. Typographical changes do not change plan direction or policy content.
AM047	66	Policy LPA10 "Parkside East", criterion 3 part i)		put training schemes in place (where practicable) to increase the opportunity for the local population to obtain access to and employment at the site.	Typographical correction	None. Typographical changes do not change plan direction or policy content.

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AM048	66	Policy LPA10 "Parkside East", criterion 4	the site which falls to the east of the M6 (see pPolicies mMap).	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM049	66	Paragraph 4.36.3	freight by rail) and addressing climate change.	Grammatical correction	None. Typographical changes do not change plan direction or policy content.
AM050	70	Policy LPA11 "Health and Wellbeing", criterion 7		promote a <u>A</u> ctive d <u>D</u> esign principles as established by Sport England; and	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM051	71	Paragraph 4.39.3 - 3rd bullet down.		• limited levels of physical activity; <u>and</u> rising levels of obesity (in adults and children);	Grammatical correction	None. Typographical changes do not change plan direction or policy content.
AM052	72	Paragraph 4.39.7		Further details of Active Design are set out in the Sport England document " <u>A</u> ctive Design: Planning for h <u>H</u> ealth and w <u>W</u> ellbeing through s <u>S</u> port and p <u>P</u> hysical a <u>A</u> ctivity" 2015. Active <u>d</u> <u>D</u> esign principles will be applied as	Typographical correction	None. Typographical changes do not change plan direction or policy content.

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				appropriate to new development proposals in the Borough to help provide opportunities for active and healthy lifestyles.		
AM053	82	Paragraph 6.3.8	Policy LPC01 requires that in new developments on a greenfield site of 25 or more dwellings, at least 20% of the.....	For clarity.	None. Typographical changes do not change plan direction or policy content.
AM054	90	Policy LPC03 "Gypsies, Travellers and Travelling Show People, criterion 5, part b)		avoid prejudicing the operations of any existing employment uses.	Grammatical correction	None. Typographical changes do not change plan direction or policy content.
AM055	97	Policy LPC05 "Open Space", criterion 2 part a)		a) it is clearly demonstrated that the open space (having regard to the standards referred to in Table- 6.9 7.1) is surplus to requirements; or	Typographical correction (the table number quoted in this policy is incorrect)	None. Typographical changes do not change plan direction or policy content.
AM056	102	Policy LPC06 "Biodiversity and Geological	Add new clause 7 to Policy LPC06	<u>7. Further details concerning the implementation of this policy will be set out in the Council's proposed Nature Conservation</u>	For clarity and to address the comments of	The additional clause does not change the findings in relation to policy LPC06. The

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		Conservation"		<u>Supplementary Planning Document.</u>	Natural England.	changes do not set out any new requirements as such, but just signpost to a proposed SPD.
AM057	104	Paragraph 7.6.5		It has been identified that new housing development in the <u>Liverpool City Region</u> Borough, particularly when considered cumulatively, may <u>is likely to</u> cause <u>significant</u> ecological effects on the Sefton Coast SAC and other designated European sites around the Liverpool City Region due to increased recreational pressure. The Council is working with other local authorities and partner organisations in the City Region to quantify these effects and to identify, <u>through the preparation of a City Region wide recreation mitigation strategy,</u> a strategic and consistent approach to any mitigation that is required. This may include the use of developer contributions (if these are shown to be	For clarity and to address the comments of Natural England.	The paragraph discusses mechanisms for delivering mitigation with regards to recreational pressure on European protected sites. Proposed modifications clarify the City-wide response, which will be important in terms of how the relevant plan policies are applied. However, this is not policy as such, and so the effects identified in

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				necessary to mitigate the effects of development in different parts of the City Region on the European sites). Any such contributions linked to development in St.Helens Borough will be proportionate to the identified scale of its impacts. The Council will use this approach, subject to agreement of its details, to address this issue.		the SA remain the same.
AM058	104		New paragraph 7.6.5A	<u>The City Region recreation mitigation strategy referred to in paragraph 7.6.5 above has yet to be completed. However, within St Helens any developer contributions are likely to be focussed at least in part on the delivery of strategic greenspace enhancements in the local area, for example at Bold Forest Park. The Bold Forest Park (BFP) Area Action Plan forms part of the St. Helens Local Plan and provides a framework for the development of the BFP area, which covers about 1,800ha of land</u>	For clarity and to address the comments of Natural England.	This is supporting text, which provides clarity on the mechanisms and opportunities for mitigating impacts on biodiversity (particularly on European sites). Whilst a positive addition, it has no implications for the SA findings. The SA identifies that there is a policy framework in

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				<u>in the southern part of the Borough. Due to its location on the urban fringe of St. Helens, the BFP is potentially accessible to a large sub-regional population and is capable of playing an important role as an alternative recreational destination. The Council will continue to promote the BFP as a sub-regional greenspace and to seek opportunities for additional funding to help improve the functionality and management of the BFP.</u>		place to secure mitigation and enhancement. Positive effects are recorded as a result. These changes do not alter this.
AM059	105	Paragraph 7.6.11	The Nature Conservation SPD sets <u>will set</u> out in more detail how this should be achieved.	Grammatical correction and for clarity.	None. Typographical changes do not change plan direction or policy None.
AM060	105	Paragraph 7.6.13	The Nature Conservation SPD sets <u>will set</u> out more detail about how.....	Grammatical correction and for clarity.	None. Typographical changes do not change plan direction or policy None.
AM061	105	Paragraph 7.6.14	The Nature Conservation SPD includes <u>will include</u> examples of how	Grammatical correction and for	None. Typographical changes do not

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				habitat for.....	clarity.	change plan direction or policy content.
AM062	108	Paragraph 7.12.1	Supplementary Planning Document (SPD) seeks will seek to enhance the Borough's natural.....	Grammatical correction	None. Typographical changes do not change plan direction or policy content.
AM063	115	Paragraph 7.18.13	The St.Helens Nature Conservation SPD provides will provide further guidance on the Council's approach, crucial parts of which are.....	Grammatical correction	None. Typographical changes do not change plan direction or policy content.
AM064	119	Paragraph 7.21.7		Parks and gardens of national historic importance are designated as Registered Parks and gardens and included in a register maintained by Historic England. There are currently two three Registered Parks and Gardens in the Borough at Taylor Park (which was part of the former Eccleston Estate), and St.Helens Cemetery in Windle, a landscape associated with the Former	Factual correction, as there are 3 Registered Parks and gardens in St Helens.	None. Factual correction in supporting text has no bearing on the appraisal findings.

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				<u>Pilkington Headquarters Complex.</u>		
AM065	123	Policy LPC12 "Flood Risk and Water Management", part 12		Proposals for the soft or hard landscaping of any development site should, where practicable, demonstrably reduce the expected rate of surface water discharge from the site, for example through the use of permeable surfaces.	To provide greater flexibility and to accord with the Council's guidance on SuDS schemes.	Removal of an example does not change the requirements set out in the policy. Therefore, the effects remain the same.
AM066	156	Paragraph 8.21.3	through the Digital Economy Bill Bill <u>Act</u> , will make the roll-out of.....	Factual correction	None. Factual correction in supporting text has no bearing on the appraisal findings.
AM067	161	Paragraph 8.27.7		The Manchester Mosses Special Area of Conservation (SAC) has been identified as being at risk of harm from increased air pollution caused by traffic. For this reason, all proposals for development that would cause an increase in traffic levels that would exceed one or both of the thresholds in paragraph 3 of Policy LPD09 must be accompanied by sufficient	In the interests of clarity, and to address the comments of Natural England.	The supporting text should mean that the potential for cumulative effects upon Manchester Mosses SAC are better considered. Whilst this is a beneficial change, it has no implications

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				evidence to enable the effects upon the SAC to be assessed. <u>Under part 1 of Policy LPC06, smaller development proposals would also need to be accompanied by such evidence if they are likely to have a significant effect alone or in combination with other projects on the SAC.</u> Any significant effects would need to be addressed in line with Policy LPC06.		for the overall SA findings (which already consider that policies LPC06 and LPD09 are beneficial with regards to addressing air quality impacts on the SAC). Clarifications are unlikely to make a significant difference.
AM068	161		New paragraph 8.27.7A	<u>The precise details of the measures required in response to point (3) of policy LPD09 will depend on the details of the development itself. However, effective measures available (depending on the type of development) may include:</u> <u>1. Electric vehicle charging points at parking spaces;</u> <u>2. Provision of a communal minibus (particularly if electric), and car club space;</u> <u>3. Cycle parking and shower</u>	In the interests of clarity, and to address the comments of Natural England.	The supporting text provides examples of some of the measures that can be employed to reduce air pollution. Whilst this is useful, it has no implications for the SA (which must base the assessment upon the policy content). The important factor is the requirement to

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				<p><u>facilities for staff;</u> <u>4. On-site services (e.g. GP surgeries and shops) to reduce need for off-site movements;</u> <u>5. Personalised Journey Planning services for residents. If employment premises the company could provide incentives for car-sharing and minimising car journeys for work;</u> <u>6. Production of sustainable travel information for residents e.g. accurate and easily understandable bus timetables;</u> <u>7. Implementation of a Staff Management Plan to place restrictions on car use by Staff;</u> <u>8. For vehicles generating HGV movements, restrictions to keep movements below 200 Heavy Duty Vehicles per day, or a commitment to ensuring all HGVs used will be Euro6 compliant.</u></p>		<p>establish and mitigate negative effects (which is already set out in the policy and is reflected in the SA findings).</p>

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AM069	164	Paragraph 8.30.7	childhood obesity, Policy LPD14 <u>0</u> therefore restricts the areas.....	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM070	165	Appendix 1: Glossary		Insert new glossary as set out in Appendix A to this schedule.	The changes to the glossary are proposed to make the document more concise (by excluding some entries which are not referred to in the main text of the Plan and removing duplicates). Some of the entries have also been revised to be more accurate and/or to be consistent with revisions to the NPPF.	None. Glossary information has no relevance to the SA findings.
AM071	191	Appendix 3: St. Helens Local Plan		Change appendix title to "Appendix 3: St. Helens Local Plan 2020-2035–"	For clarity	None. Relates to document structure

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		2020-2035 - Strategic Aims, Objectives and Policies		Strategic Aims, Objectives and Policies"		rather than policy content.
AM072	217	Appendix 5: Site profiles - Allocated Housing and Employment Sites		Change appendix title to "Appendix 5: Site profiles - Allocated Employment and Housing and Employment Sites"	To fit with the order in which the sites appear in the appendix.	None. Relates to document structure rather than policy content.
AM073	217	Appendix 5: Site profiles - Allocated Housing and Employment Sites		Change note on page 217 to read [Please note: the requirements set out for each site in this appendix are in addition to any others that are needed to comply with Plan policies e.g., in relation to <u>transport or other</u> infrastructure provision, <u>natural environment, greenspace, heritage, site layout and design, flood risk, residential amenity or any other matter. Any development proposals affecting any of the sites must clearly demonstrate the impacts of the development and any necessary mitigation measures.</u>]	To make it clearer that the site specific requirements identified in this appendix are indicative and must be read in conjunction with the Plan policies as a whole.	None. The SA findings took account of the Local Plan policies considered holistically. Therefore, the assessments about the likely effects of development at allocated sites was made in the context of the full range of plan policies (not just the site profile information).

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AM074	217	Appendix 5: Site profiles - Allocated Housing and Employment Sites		Revise the entries stated for the sites as set out in Appendix B to this schedule.	Various reasons as set out in Appendix B.	As above
AM075	243	Appendix 6: Site profiles - allocated Gypsy and Traveller Sites		Change appendix title to "Appendix 6: Site pProfiles - aAllocated Gypsy and Traveller Sites	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM076	247	Appendix 7: Site Profiles - Safeguarded Employment and Housing Sites		Change note on page 247 to read [Please note: the <u>sites listed in this appendix are not allocated for development within the Plan period.</u> <u>The</u> requirements set out for each site in this appendix are in addition to any others that are needed to comply with Plan policies <u>may apply to a future development proposal at the time</u> e.g., in relation to infrastructure provision,]	To make it clearer that (in line with Policy LPA06) the sites in this appendix are not allocated for development before 2035 and that the requirements listed for each site are indicative.	The SA focused upon the effects of development within the Plan period (i.e. the allocated sites). Ithe implications of safeguarded land was identified, but it was made clear that impacts would need to be determined through a plan review. Therefore, modifications related to the safeguarded sites will have no significant effect on the findings.

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AM077	247	Appendix 7: Site Profiles - Safeguarded Employment and Housing Sites		Revise the entries stated for the sites as set out in Appendix B to this schedule.	Various reasons as set out in Appendix B	As above
AM078	283	Appendix 11: Town, district and local centre boundaries		Change appendix title to " Appendix 11: Town, d <u>D</u> istrict and l <u>L</u> ocal e <u>C</u> entre b <u>B</u> oundaries	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM079	p7	Policies Map		Green Belt boundary - Land rear of 2 to 12 Leyland Green Road and land surrounding and including 168 Booth's Brow, Garswood - should not be shown as being in the Green Belt. See Appendix C for more detail	This is a drafting error - this land has been accidentally identified in the Green Belt review as part of the current Green Belt when it was not included in the 1998 UDP Green Belt. It was mistakenly identified in an	None. The appraisal findings were not influenced by the error on the policy map.

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					earlier version of the Green Belt review and was known as Location 41 in the 2016 Green Belt Review. There is therefore no change to the status of the land compared to the 1998 UDP Green Belt boundary.	
AM080	p10	Policies Map		Slight amendment to the boundary of the Borough Cemetery, Windle - Registered Parks and Gardens. See Appendix C for more detail	The current boundary is incorrect	Has no implications for the SA findings. The correct boundary was referred to when determining potential effects in the SA.
AM081	p23	Policies Map		Minor alteration to the Conservation Area Boundary for Rainhill See Appendix C for more detail	The current boundary is incorrect	Has no implications for the SA findings. The correct boundary was referred to when

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						determining potential effects in the SA.
AM082		Policies Map		Add the Local Geological Sites to the Policies Map See Appendix C for more detail	For accuracy	Does not affect the appraisal findings (which took account of the location of LGS).
AM083	P46		New footnote	The total number of units for allocated sites (2058 units) is 2 units more than row P in Table 4.6 due to rounding of delivery rates.	For clarity.	Has no implications for the SA findings.
AM084	Pages 6, 129, 142, 146, 147 & 163			Remove double page numbers at foot of each of these pages	Typographical correction	None. Typographical changes do not change plan direction or policy content.
AM085		Policies Map	New site (AC12)	Additional Anomaly Map showing the proposed Green Belt change to Gibbons Road, Garswood.	Additional update following representation at LPSD stage. The site was not identified at LPPO stage, however, is	Slight change is related to green belt review. No significant effects likely to arise given the insensitive nature of the area

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					considered an anomaly site that meets the criteria for anomaly changes in the Green Belt, and therefore should be included as an anomaly change.	involved.
AM086	10	Paragraph 2.8.1	Paragraph 2.8.2	2.8.1 challenge is for the town and other centres to diversify their role in response to changing economic circumstances, including competition from retail parks and internet shopping. <u>The Council has successfully secured an initial £173,029 capacity funding grant to support the development of a Town Deal Board and Investment Plan from the Governments Town Deal fund to help with projects around land use and regeneration, connectivity, skills and employment</u>	Factual update. The regeneration of the town and district centres are a key priority of the Local Plan. The Council are bidding to secure additional funding as part of the Town Deal initiative and is entering into a strategic partnership with the English Cities	Update to reflect delivery mechanism, not part of the policy text. No effects on the SA.

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				<p><u>for St Helens Town Centre.</u></p> <p><u>2.8.2 In addition, the Council is entering into a strategic partnership agreement with the English Cities Fund (ECF) to ensure the delivery of a Borough wide regeneration strategy initially starting with St Helens Town Centre.</u></p>	Fund.	
AM087	84	Policy LPC02		2. Proposals for new open market housing developments of 44- 10 units or more will be required to.....	To ensure the Plan is compliant with the latest version of the NPPF.	Minor change unlikely to change SA findings.
AM088	17	Policy LPA02 "Spatial Strategy"	Add new criterion 4 to Policy LPA02	<p><u>4. Comprehensive regeneration of the wider Borough will be delivered by the English Cities Fund Regeneration Partnership, through the provision of quality housing, new commercial activity, upgraded infrastructure and the overall improvement of the social and economic viability of the Borough on a phased basis.</u></p>	As a factual update following the Council entering into a strategic partnership with the English Cities Fund.	Clarity on one method of delivery provides more certainty that positive effects are likely to occur, but does not change the overall findings.

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AM089	17 - 18	Policy LPA02 "Spatial Strategy", criteria 4-10		Re-number existing criteria 4-10 to 5-11.	For clarity following modification AM088 amendments.	Formatting does not affect the appraisal findings.
AM090	24	Paragraph 4.6.19		As a priority, the Council will continue to work to support the redevelopment of brownfield sites in the urban area. It is also pursuing opportunities to enhance town centres in the Borough, for example through the creation of the St. Helens Town Centre Strategy. In addition, the Council intends to work pro-actively with partner organisations where necessary to secure the suitable regeneration of other town, district and local centres and of existing housing and employment areas, particularly in less affluent areas. The Council will prepare Supplementary Planning Documents covering specific areas where this is considered necessary to help implement their regeneration.	For clarity following additional paragraphs outlined in modification AM091.	Update not part of the policy text. No effects on the SA.

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AM091	24		New paragraphs 4.6.20 to 4.6.22	<p><u>4.6.20 The Council is entering into a formal partnership agreement with the English Cities Fund as the Council’s preferred strategic partner to ensure the delivery of a Borough wide regeneration strategy, including economic regeneration and housing. The Council has recognised that a new approach to growing the economy of the Borough is required that seeks to work pro-actively with the private sector and establish a strategic partnership maximising the opportunities presented to deliver significant future growth in St. Helens and deliver key priorities including Town Centre regeneration, social wellbeing and providing appropriate infrastructure to support future development.</u></p> <p><u>4.6.21 Furthermore, as part of the ‘Town Deal’ initiative established by the Government in 2019, the</u></p>	<p>Factual update. The regeneration of the town and district centres are a key priority of the Local Plan. Therefore, reference to both the ECF and Town Deal is considered appropriate.</p>	<p>Update to reflect delivery mechanism, not part of the policy text. No effects on the SA.</p>

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				<p><u>Council are seeking to secure significant investment of up to £25 million. This funding will be used to help increase economic growth with a focus on land use and regeneration, improved connectivity (both transport and better broadband connectivity), skills and employment, and heritage, arts and culture for St. Helens Town Centre.</u></p> <p><u>4.6.22 The Council will prepare Supplementary Planning Documents covering specific areas to help implement regeneration where this is considered necessary.</u></p>		
AM092	32		New paragraphs 4.12.2 and 4.12.3	<p><u>4.12.2 The Local Plan's vision, still stands true as we plan for recovery from the COVID-19 pandemic: By 2035, St. Helens Borough will provide through the balanced regeneration and sustainable growth of its built-up areas, a range</u></p>	As a factual update following the Council entering into a strategic partnership with the English Cities Fund in a post	Clarity on one method of delivery and addressing recovery provides more certainty that positive effects are likely to occur, but does not

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				<p><u>of attractive, healthy, safe, inclusive and accessible places in which to live, work, visit and invest. Key to this is a continued focus on the economy, so that St. Helens residents are able to access good quality jobs that raise their living standards, whilst also improving physical and mental health.</u></p> <p><u>4.12.3 It is anticipated that the English Cities Fund Regeneration Partnership and the Council's successful Town Deal funding bid will also assist in the post COVID-19 economic recovery.</u></p>	COVID19 economy.	change the overall findings.
AM093	32	Paragraphs 4.12.2 to 4.12.18		Re-number existing paragraphs 4.12.2 – 4.12.18 to 4.12.4 – 4.12.20	For clarity, following modification AM092 amendments.	Formatting does not affect SA findings
AM094	73	Policy LPB01 "St.Helens Town Centre and Central	New criterion 2	<u>2. The English Cities Fund Regeneration Partnership will help deliver a comprehensive</u>	As a factual update following the Council entering	Clarity on one method of delivery provides more certainty that

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		Spatial Area”		<u>redevelopment of the Town Centre and Central Spatial Area, including new commercial activity, upgraded infrastructure, the provision of quality housing, and the overall improvement of the social and economic viability of the area.</u>	into a strategic partnership with the English Cities Fund.	positive effects are likely to occur, but does not change the overall findings.
AM095	73-74	Policy LPB01 “St.Helens Town Centre and Central Spatial Area”, criteria 2-8		Re-number existing criteria 2-8 to 3-9.	For clarity, following modification AM094 amendments.	Formatting does not affect SA findings
AM096	75	Paragraph 5.3.6		5.3.6 A Town Centre Strategy ⁴⁶ to provide a comprehensive approach to the future of St.Helens Town Centre underwent public consultation during August – October 2017. The Strategy set out a vision for the future of the town centre detailing thematic initiatives to deliver this. <u>In January 2020 the Council successfully received an initial £173,029 capacity fund as part of the Governments</u>	As a factual update following the Council’s bid to secure additional funding as part of the Town Deal initiative.	Update to reflect delivery mechanism, not part of the policy text. No effects on the SA.

Mod Ref No.	Page number	Current policy/paragraph	New policy/paragraph	Change (deleted text in strike through ; new text <u>underlined</u> and bold; changes to diagrams, tables, etc. described in italic text).	Reason for Modification	Implications for the SA
				<p><u>Town Deal initiative. The Council are now seeking to secure significant investment of up to £25 million. This funding will be used to help increase economic growth with a focus on land use and regeneration, improved connectivity (both transport and better broadband connectivity), skills and employment, and heritage, arts and culture. A Town Investment Plan will be developed and will sit alongside the Town Centre Strategy.</u></p>		
AM097	75	Paragraph 5.3.8		<p>5.3.8 The Council will support initiatives and schemes that will help to implement the Strategy by revitalising and enhancing the Town Centre's retail, leisure and cultural offer. The 'Area of Opportunity', referred to in the Strategy, has been identified due to the potential to reconfigure and / or redevelop land and premises close to Church Square</p>	<p>As a factual update following the Council entering into a strategic partnership with the English Cities Fund.</p>	<p>Update to reflect delivery mechanism, not part of the policy text. No effects on the SA.</p>

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				and Chalon Way for suitable town centre uses. <u>To support this initiative and to assist in the regeneration of the area, the Council is entering into a regeneration partnership with the English Cities Fund to deliver a comprehensive redevelopment of the Town Centre (and wider borough on a phased basis).</u>		
AM098	77	Policy LPB02 "Earlestown Centre", criterion 4		4. The delivery and implementation of a Council-led strategy to provide a framework for the future regeneration and development of the town centre will be supported. <u>The English Cities Fund Regeneration Partnership will help deliver a mix of residential, leisure, business and retail development all centred around the Town Centre.</u>	As a factual update following the Council entering into a strategic partnership with the English Cities Fund.	Provides more certainty that positive effects are likely to occur, but does not change the overall findings.
AM099	78	Paragraph 5.6.3		5.6.3 The Council will seek to safeguard <u>and build upon</u> this important role and function by	As a factual update following the Council entering	Update to reflect delivery mechanism, not part of the policy

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				<p>applying the 'town centre first' approach to ensure that Earlestown remains the Borough's second centre providing a highly sustainable location for retail and other services. <u>Through its partnership with the English Cities Fund the Council will work towards creating a mix of residential, leisure, business and retail development all centred around the Town Centre.</u></p>	<p>into a strategic partnership with the English Cities Fund.</p>	<p>text. No effects on the SA.</p>
AM0100	78	Paragraph 5.6.8		<p>5.6.8 To provide a focus for future development of the town centre and positively</p> <p>promote Earlestown as a location to live, <u>through the English Cities Fund Regeneration Partnership</u> the Council, intend to bring forward a dedicated Town Centre strategy,</p> <p>.....</p>	<p>As a factual update following the Council entering into a strategic partnership with the English Cities Fund.</p>	<p>Update to reflect delivery mechanism, not part of the policy text. No effects on the SA.</p>

