



ST HELENS
BOROUGH COUNCIL

SUPPLEMENTARY PLANNING DOCUMENTS

- **Design**
- **Developer Contributions**
- **Open Space Provision and Enhancement**
- **Transport and Travel**

Consultation Statement

2024

Introduction

- 1.1 The St Helens Borough Local Plan up to 2037, was adopted in July 2022, and forms part of the development plan for the Borough. There is an acknowledgement within the Local Plan that a number of existing Supplementary Planning Documents (SPD) need to be reviewed, along with the production of a number of new SPDs; therefore, St Helens Borough Council (“the Council”) has prepared the following draft SPDs:
- Design SPD
 - Developer Contributions SPD
 - Open Space Provision and Enhancement SPD
 - Transport and Travel SPD
- 1.2 Once adopted, these SPDs will be a material consideration in the determination of planning applications in the Borough. The Design SPD will replace the ‘*Design Guidance*’ SPD (2007) and the ‘*New Residential Development*’ SPD (2010); and the Transport and Travel SPD will replace the ‘*Ensuring a Choice of Travel*’ SPD (2010) as well as ‘*Guidance Note for Travel Plans*’ (2016) and ‘*Guidance Notes for the Submission of Transport Assessments*’ (2016).

Consultation Process

- 2.1 To help define and shape their content, a 6-week targeted scoping and screening consultation was undertaken on the proposed draft SPDs between November and December 2022. Following the screening process, and due to a HRA and SA/SEA having been undertaken for the St Helens Borough Local Plan up to 2037 (2022) that included the identified likely effects of policy at that stage, it was concluded that none of the proposed draft SPDs would have significant environmental effects beyond those considered by the Local Plan HRA and SEA; therefore, they did not trigger the need for either a HRA or SEA. The required statutory consultation bodies (the Environment Agency, Historic England, and Natural England) all agreed with the Council’s conclusions.
- 2.2 In accordance with Regulation 12 of The Town and Country (Local Planning) (England) Regulations 2012, and the Council’s adopted Statement of Community Involvement, the Council carried out a 6-week statutory consultation on all four draft SPDs that ran from Wednesday 20th December 2023 to Tuesday 30th January 2024.
- 2.3 The Council notified all statutory consultees (including Parish Councils, Ward Councillors, neighbouring authorities and members of the public, agents, developers and organisations contained on the Planning Policy Consultation Database) about the consultation.
- 2.4 The consultation was available to view online on the Council’s website <https://www.sthelens.gov.uk/article/3774/Plans-under-preparation> and the Council’s Communications Team posted articles on the Council’s various social media outlets. Comments were invited in writing to be sent either via email or by post.
- 2.5 Prior to the public consultation, the Planning Policy Team liaised with various internal Council departments, including Development Control, Open Space, Highways and Legal Services. Informal consultation was also undertaken with the Lead Local Flood

Authority (drainage), Education, Nature Conservation, Housing and the Integrated Care Boards (healthcare).

Representation Summary

- 3.1 Overall, a total of 28 responses have been received on the draft SPDs. This includes representations from the following stakeholders:
- Active Travel England
 - Asteer Planning on behalf of Wain Estates (Land) Limited
 - Canal and River Trust
 - DK-Architects
 - Education Department – St Helens Borough Council
 - Frost Planning on behalf of English Land
 - Historic England
 - Housing Team - St Helens Borough Council
 - Knowsley Council
 - Lead Local Flood Authority – Lancashire County Council
 - Lead Local Flood Authority – St Helens Borough Council
 - Lichfields on behalf of Taylor Wimpey and Story Homes
 - Liverpool City Region Combined Authority
 - Mersey Forest
 - National Highways
 - Network Rail
 - Nexus on behalf of BXB (Cowley Hill) Ltd.
 - NHS Property Services
 - Open Spaces Team - St Helens Borough Council
 - Peel L&P
 - Pegasus Group on behalf of Redrow Homes Ltd.
 - Rainhill Civic Society
 - Sport England
 - The Coal Authority
 - Torus Developments
 - Turley on behalf of Harworth Estates Investments Ltd.
 - United Utilities
 - WSP on behalf of Barratt / David Wilson Homes
- 3.2 The following tables summarise the responses received during the consultation period and include the Council's response to each of the comments. For ease, each draft SPD has its own section.
- 3.3 The Appendices include tables that identify any changes proposed to each draft SPD as a result of comments received and / or for further clarity or additional legislation updates.

St Helens Borough Council Design SPD – Consultation Responses

The draft Design SPD provides a comprehensive guide to inspire and guide the delivery of high-quality development within the Borough, providing clear guidance to applicants, developers, the community and landowners on the quality of new development the Council will expect.

It supports the Council’s six strategic priorities and offers further guidance and interpretation on how a high standard of design can be met on any level, from a simple single storey extension to a large logistics warehouse and supplements the Local Plan’s policies covering high quality design and measures to adapt to climate change.

All development will analyse the **Site & Context**, irrespective of its scale. The draft SPD then identifies three tiers of design, namely **Strategic, Neighbourhood and Streets & Buildings**. The larger the scheme, the higher the design input that will apply.

The process is flexible with the main objective being ‘*a means of identifying and considering design issues in a logical sequence that can be shared and understood by all of the parties at the appropriate time*’.

Each chapter concludes with a checklist that sets out the issues for consideration relative to the tier of design.

The following table summarises the responses received in relation to the draft Design SPD and includes the Council’s response to each of the comments. Appendix A includes a Table of Changes proposed for the draft Design SPD.

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
Active Travel England	The statutory consultee role of Active Travel England (ATE) does not extend to local planning or planning policy, therefore ATE will not respond on this occasion.	Comments noted – no changes required.
Asteer Planning on behalf of Wain Estates (Land) Limited	<p>BFGV is the largest allocation within the St. Helens Local Plan, and as such, the design requirements for the site should be clarified in order to facilitate the masterplanning of the site.</p> <p>The Draft SPD should either provide specific guidance in relation to the BFGV allocation; or preferably, clarify that the design requirements for the BFGV will be dealt with through the separate, more detailed Masterplan SPD.</p>	<p>This will be a separate Masterplan SPD / Design Code, currently being commissioned.</p> <p>BFGV will be dealt with through a separate Masterplan SPD.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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	<p>The Design SPD should make the relationship between relevant Local Plan Policies and the various SPDs very clear.</p>	<p>No change proposed as the draft SPD states “<i>provides further guidance and interpretation on how a high standard of design can be met, and supplements the Local Plan’s policies covering high quality design</i>” (Text taken from Introduction). Each Design Theme is introduced in the context of Local Plan policy.</p>
Canal and River Trust	<p>No specific comments.</p>	<p>Comment noted – no changes required.</p>
DK Architects	<p>Cover caption says it’s of ‘Heald Farm Court’ but the image selected is of Warburton Hey. Figure 136 references ‘The Gables’ but this is not an image of our scheme, captions need updating.</p>	<p>Comments noted - captions have been updated accordingly.</p>
Frost Planning on behalf of English Land	<p>The SPD’s duplicate much of existing national and local policy. They should be shorter and simpler toolkits for all to use.</p> <p>All SPDs fail to recognise that many employment sites are difficult to deliver on viability grounds. The SPDs impose layers of additional financial and other obligations (e.g. design, BNG, open space, travel plans), therefore any SPDs should exclude key employment sites and sites that benefit from extant planning permissions.</p>	<p>Design is a broad topic. The draft SPD is structured so that applicants can find relevant guidance without reading the whole document. The following paragraph on viability has been added to the draft SPD introduction.</p> <p><i>‘It is the responsibility of the applicant to take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. Where the principles set out in the SPD impact upon the viability and deliverability of a development, the applicant can argue a case for non-compliance, by preparing a viability appraisal to be shared with the Council. This does not, however, exempt the developer from adopting the design process set out in the SPD in order to achieve the high quality design outcomes required by the NPPF and National Design Guide.’</i></p>
Historic England	<p>The document would be more effective if it was informed by, and provided a summary of, an analysis of local character and context. Paragraph 35 of the National Design Guide states that: “All local design policies, design guides and codes will need to set</p>	<p>Comments noted – no changes required (save for reference to Policy LPC11 as below). The draft SPD sets out a process of analysing the local context and preparing a baseline study on a site-by-site basis, rather than setting this out in detail.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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	<p>out a baseline understanding of the local context and an analysis of the local character and identity”.</p> <p>Whilst the authority may already hold this information, it does not come through strongly enough in the draft SPD. As a minimum the document should highlight particular design elements that define local character and make St Helens a distinctive place, such as local history and cultural influences, materials, patterns of built form, landscape character, prevailing architectural styles and local vernacular.</p> <p>We do however suggest that reference should be made to Local Plan Policy LPC11: Historic Environment in order to draw the readers attention to the requirements of local and national policy when bringing forward development proposals that could affect the significance of heritage assets. This could possibly be referenced in the Links section. It may also be prudent to specifically highlight the requirement for applicants to prepare an Assessment of Significance for all proposals that may affect a heritage asset, and the need for a desk-based assessment, and where necessary field evaluation, where assets of archaeological interest are involved.</p>	<p>Characterisation studies, including detailed analysis of local character and identity, will form the basis of a design code, which is forthcoming.</p> <p>Reference to Policy LPC11: Historic Environment has been added to the Site & Context chapter; 2.1.1 Policy.</p> <p><i>“St Helens Borough has a unique heritage, based upon its history connected with the railways, mining, glass and other industries. Policy LPC11: Historic Environment sets out how the Council will seek to conserve the Borough’s historic environment and promote awareness of its shared heritage.”</i></p>
<p>Housing Team - St Helens Borough Council</p>	<p>Paragraph 4.1.3. Housing mix refers to affordable dwellings being ‘pepper potted throughout the site’ i.e. affordable dwellings should be ‘pepper potted’ throughout the site rather than being concentrated in a particular part of the site and the Council will not</p>	<p>Comments noted, and this section has been amended as follows to improve clarity: <i>“Affordable dwellings should be evenly distributed throughout the site rather than being concentrated in a particular part of the</i></p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>accept affordable housing, which, either by its design or siting, is clearly distinct from the market housing.</p> <p>I think some additional explanation or examples could help clarify what is and is not acceptable in terms of distribution of affordable housing on sites of differing sizes. I am not sure if “pepper potted” is defined in planning terminology or considered a commonly used term. However, communication I have had with a developer and RP suggests that they may interpret pepper-potted as meaning affordable homes cannot be clumped together at all and rather must be dispersed completely among market homes. This would be a concern for RPs on housing management grounds. From my on the ground experience of housing management, I would support concerns that complete dispersal of social rented housing on a site is neither desirable or financially sustainable for an RP. I do not think the intention of the SPD guidance is complete dispersal of the affordable housing. However, I’d but suggest that some further interpretation would help with clarity on this point.</p>	<p><i>site. This does not preclude limited grouping of dwellings for functional or management purposes.”</i></p>
Lead Local Flood Authority, Lancashire County Council	As the proposals lie outside of the Lancashire County boundary – no comments to make.	Comment noted – no changes required.
Lead Local Flood Authority, St Helens Borough Council	<p>In section 2.1 it mentions land uses, specifically Urban Green Space. Does this include SuDS, as there could be a bullet point mentioning “Blue Green Corridors” or “SuDS”?</p> <p>There is no reference to the Local Plan Policy LPC12: Flood Risk and Water Management. LLFA understand not all the policies are identified in the</p>	<p>This paragraph sets out the Council’s expectations for a broad analysis of land use. Further definition, in relation to SuDS, is expected in Section 2.3.</p> <p>The following reference to Policy LPC12: Flood Risk and Water Management has been added to the Site & Context chapter; 2.3.1 Policy.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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	<p>SPD, if there is space available in the document, this would be welcome.</p> <p>For the review we were searching for the keyword SuDS and it showed a match in section 2.2. Upon inspection the text was not visible. In trying to select the words it showed further text with figure references. The text appears to be the same as the key in the image. While not an issue regarding the content, it is more of layout if there are other searches in the future, as this is similar throughout the document.</p> <p>Section 5.3 shows several figures 97, 98 and 99 for examples of SuDS, however there is no supporting text in the main body of the content.</p> <p>Section 5.6 in the checklist mentions drainage, however there is no supporting text in the main body of the content.</p> <p>Section A.4 in the Nature and Landscape column does not contain any links to the Government SuDS Drainage guidance. It is worth to mention the Ciria Susdrain webpage resource (https://www.susdrain.org/) and the Ciria SuDS Manual (current version C753) https://www.ciria.org/CIRIA/CIRIA/Item</p>	<p><i>“Policy LPC12: Flood Risk and Water Management aims to ensure that development is directed to locations with the lowest risk of flooding and to locations with the least impact on water quality in accordance with the NPPF and the St Helens Strategic Flood Risk Assessment.”</i></p> <p>This issue has been resolved.</p> <p>Comments noted. The following point has been added to the text:</p> <p><i>“SuDS should be treated as a design opportunity, integrated into the wider landscape design.”</i></p> <p>See above; the checklist has been amended to reflect this.</p> <p>Comments noted, and the website resources have been added to the relevant appendix.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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	<p>Detail.aspx?iProductCode=C753?</p> <p>Section A.4 in the Nature and Landscape does not contain any links to the Councils Land Drainage Byelaws 2013 – which provides much need protection and easements to watercourse embankments. The byelaws are a critical tool the LLFA use as part of developments and maintenance.</p> <p>While the LLFA is aware there will be major changes to the drainage aspects for developments in the future, the government has yet to announce development plans or enact the Schedule 3 - Sustainable Approval Body (SAB) from the Flood and Water Management Act 2010 (FWMA). This is worth having general awareness about.</p>	<p>Comments noted, and these references have been added to the relevant appendix.</p> <p>Comments noted.</p>
<p>Lichfields on behalf of Taylor Wimpey and Story Homes</p>	<p>The SPD must acknowledge that in respect of large-scale strategic development, initial master planning for the whole site to identify constraints and design parameters is critical to bring forward development. The scale of the proposed development needs to be taken into account and detailed design would be considered later in the application process through Full or Reserved Matters applications.</p> <p>The draft SPD's wording in its current form does not differentiate between the required level of engagement for different types of planning application or for applications coming forward in a phased approach whereby consultation on a wider masterplan has already taken place. For example,</p>	<p>Comment noted. This is the process that the draft SPD sets out; agreeing strategic principals before resolving detailed design matters.</p> <p>This is not a matter for this draft SPD to address. The need for, and scope of, consultation will be determined on a case-by-case basis by the Council and the applicant at pre-application stage in accordance with the Council's latest adopted Statement of Community Involvement.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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	<p>community consultation in respect of Outline Planning applications should focus on design parameters, rather than detailed design. The draft SPD should be updated to reflect a flexible approach to engagement for types of application accordingly. It is also critical that community design expectations do not function as a barrier in terms of bringing forward development. The draft SPD should also be amended to reflect the content within the Council's Statement of Community Involvement (2013) to ensure that there is consistency across documents.</p> <p>The draft SPD should promote collaboration between developers and the Council to, if required, assist in identifying hard to reach groups and facilitate community consultation.</p> <p>It is important that the Design SPD is not overly prescriptive in terms of its approach to specific design requirements and so, the suggested checklist should be amended to reduce and simplify the design variables to reflect different types and scale of application/development.</p> <p>The draft SPD should acknowledge that a flexible approach needs to apply to the phasing of large-scale sites to reflect the complexities of multiple land ownerships, and developability of some land parcels.</p> <p>Although the Strategic Checklist setting out the design variables is useful in principle, in its current</p>	<p>The Council has a pre-application service to improve consistency and advice, and the determination of any subsequent planning application. Where possible, the Council will work with appropriate stakeholders at this stage to identify those hard to reach groups.</p> <p>Comments noted, however, a balance has to be reached between providing rigid guidance and flexible guidance. It is considered that the SPD provides the right balance, with the checklist covering a broad range of variables and not all of them will apply to all sites.</p> <p>Full consideration of phasing of large-scale sites should be made at the masterplanning stage as required under Local Plan Policies LPA03.1 and LPA04.1.</p> <p>As set out in the introduction of the SPD, the checklist covers a broad range of variables but not all of them are expected to be applied to all sites. A variable that may be of strategic</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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	<p>form, it does not allow for proposals to remain broadly conceptual, and it goes beyond the current requirements outlined in Local Plan Policy LPD01. As noted above, although the checklist is proposed to be applied to large, complex schemes, the checklist needs to be amended to reduce and simplify the design variables to reflect different types and scale of application/development. It would also be beneficial to quantify how to define 'large, complex schemes'.</p> <p>Neighbourhood Design Tier should be caveated so that the variables are subject to viability.</p> <p>Neighbourhood Design Tier checklist should also be amended to reduce and simplify the design variables to reflect different types and scale of application/development.</p>	<p>importance on one site may not be relevant to another. The expectation is that the design response would be high-level at this Tier.</p> <p>Larger more complex schemes will normally be of a strategic nature and potentially allocated within the Local Plan. Therefore, in line with the Local Plan larger employment sites will be those capable of accommodating large employment buildings over 9,000m², and for housing sites a strategic site would be development of 300 or more dwellings. However, each site will have different constraints or opportunities even though site area or number of dwellings may be the same. It is essential that each case is determined on its merit.</p> <p>The following paragraph on viability has been added to the SPD introduction:</p> <p><i>'It is the responsibility of the applicant to take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. Where the principles set out in the SPD impact upon the viability and deliverability of a development, the applicant can argue a case for non-compliance, by preparing a viability appraisal to be shared with the Council. This does not, however, exempt the developer from adopting the design process set out in the SPD in order to achieve the high quality design outcomes required by the NPPF and National Design Guide.'</i></p> <p>Comments noted, however, a balance has to be reached between providing rigid guidance and flexible guidance. It is considered that the draft SPD provides the right balance, as not all variables will apply to all neighbourhood sites.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Streets & Buildings Design Tier provides very specific design requirements and does not allow for flexibility in design. It is important to clarify that this SPD should add further detail and guidance, rather than put restrictive requirements forward that would add unnecessary financial burdens. As noted in other sections, the Streets and Buildings Checklist should be simplified to ensure that design expectations do not function as a barrier in terms of bringing forward development.</p> <p>The draft Design SPD in its current form is very prescriptive and applies a three-tier approach to assessing development proposals design credentials. Although Taylor Wimpey and Story Homes are supportive in principle of a Design SPD, it is important that its content remains conceptual and does not go beyond the current requirements outlined by Policy LPD01. It is important to emphasise that SPD's cannot determine or prescribe policy.</p> <p>The series of checklists set out within the draft Design SPD should be simplified, be applied flexibly, and reflect different types and scale of development. This flexibility will allow the SPD to remain relevant, up to date and responsive to changes over time.</p> <p>In its current form, the SPD lacks any reference to guidance for specific sites. It is important that the Council set out, at the outset, how this SPD aligns to other emerging documents to ensure that there are</p>	<p>As set out in the introduction to the SPD, the checklist covers a broad range of variables and not all of them are expected to be applied to all sites. Whilst the Streets & Buildings Design Tier is more proscriptive than the Strategic and Neighbourhood Tiers, it aims to give clarity on the Council's expectations. This is in line with new legislation for design coding and the Government's emphasis on good design as set out in the National Design Guide, Building for a Healthy Life and the National Model Design Code.</p> <p>The SPD does not introduce new policy, as explained in its introduction. it sets out how the Council will expect applicants to interpret policy.</p> <p>The checklist covers a broad range of variables and it is recognised that they are not expected to be applied to all sites.</p> <p>The draft SPD will inform subsequent SPDs/Design Codes that come forward for specific sites.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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	<p>no inconsistencies between the aspirations of documents.</p> <p>It is critical that the content of the draft Design SPD does not add unnecessary financial burdens that may impact the viability of development coming forward, as set out in the Planning Practice Guidance.</p>	<p>A paragraph on viability has been added to the draft SPD introduction, as set out above.</p>
Mersey Forest	<p>The Forest Plan is not currently mentioned. We feel that a link to the Forest Plan when addressing nature in the SPD would be beneficial.</p> <p>We would like to draw particular attention to the policies regarding design and St Helens in the current Mersey Forest Plan: Policy 4. Planting and Design: Policy SH1. Urban areas, settlements and employment sites.</p>	<p>Comments noted, and reference to The Forest Plan has been added.</p>
National Highways	<p>Given the nature of the Design SPD, National Highways is not greatly impacted by the proposals within it. However, we are always supportive of plans that seek to place importance on sustainability and active travel.</p>	<p>Comment noted – no changes required.</p>
Nexus Planning on behalf of BXB (Cowley Hill) Ltd.	<p>The introduction discusses the use of Design Tiers and Checklists to identify relevant issues. It would be useful here to note that the planning status of the scheme is also relevant to the scope of design considerations and notably that key principles may have been established at the outline stage and that outline approval will in turn establish the key</p>	<p>Comments noted, and changes have been made to the introduction to improve clarity.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>principles to be considered at reserved matters stage.</p> <p>Considering specifically how the Design Guide is to be applied at Outline and Reserved matters (or full) stages may also assist in adding clarity to the timing and extent of community engagement, such as that referred to in Figure 7, and in the merits of pre-application advice (section 1.12) as well as other elements of the design guide.</p> <p>Strategic Design Tier - it would be useful to note that this would normally be considered as part of an outline application on a larger site. Given the strategic nature of this level of design it would be useful to include references to indicative or illustrative proposals more consistently to ensure clarity in that definitive design solutions are unlikely to be possible at this level (or stage). Suggested amended wording provided:</p> <p>3.0, page 45, second paragraph as follows: This level of design will result in the production of a Parameter Plan and /or an Illustrative Masterplan.</p> <p>3.2.1, page 51, fifth bullet: Prepare illustrative visualisations of the development from significant viewpoints.....</p> <p>3.2.3, page 53 second bullet: The illustrative layout....</p>	<p>The suggested changes are not considered necessary.</p> <p>Images of completed design solutions have been included in the Strategic Design Tier to illustrate the positive impact of considering & incorporating certain principles at a conceptual level e.g. retained trees forming a focal point for development.</p> <p>Comments noted, and to improve clarity the text has been amended accordingly.</p> <p>Comments noted, and to improve clarity the text has been amended accordingly.</p> <p>Comments noted, and to improve clarity the text has been amended accordingly.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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	<p>3.2.2. page 54, first bullet: Prepare illustrative design strategies.....</p> <p>3 3.4.2, page 61, second bullet: Junction layout drawings will normally be required at this stage....</p> <p>Development fronting on the Landscape Strategic Identity, 3.2.1, page 49 – the eighth bullet point lacks clarity and could potentially be overly restrictive and unreflective of the nature of the landscape referred to. The point currently reads as follows: <i>‘Development should front onto the open landscape, to avoid prominent backs of buildings’</i> This is proposed to be re-worded as follows: Development should normally front on to accessible open space and key landscape areas, to avoid prominent backs of buildings’</p> <p>Strategic Movement – Car parking Highways, 3.4.4 – the reference to car parking at the second and fourth bullet points on page 65 are considered to be too specific and detailed for the Strategic level of design and perhaps should be moved to Neighbourhood or Street levels.</p> <p>The first sentence of the second bullet point should be re-worded as follows: Illustrate how parking for cars, bikes and other relevant transport will be provided on site.</p>	<p>Comments noted, and to improve clarity the text has been amended accordingly.</p> <p>This prompt has been included to take account of the fact that whilst many key design issues can be agreed with the provision of conceptual design proposals for a strategic site, more detailed junction layouts will need to be provided in order for the proposal to be appropriately assessed.</p> <p>Further clarity has been added. This prompt now reads: “Development should front onto the open landscape, open space and highways to avoid prominent backs of buildings”.</p> <p>These prompts are included as the type and arrangement of parking can have a significant impact on layout, density and appearance, even at the Strategic Tier.</p> <p>Comments noted, and to improve clarity the text has been amended accordingly.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>The fourth bullet point again would appear to be overly prescriptive at this Strategic level and lacks flexibility in considering future extensions to houses. We propose this line is reworded.</p> <p>For the sake of consistency references to car parking at Neighbourhood level should also be amended.</p> <p>At 4.4.5 Car Parking, page 91, the tenth bullet point should be reworded as follows: '<i>On-plot parking should be generally accessed from the front with garaging and parking spaces located to the side or rear of a dwelling. This maintains good surveillance from properties. In those cases where frontage parking is proposed this should not dominate the street frontage</i>'.</p> <p>Strategic Resources – Design – 3.5.1, page 67. The third sentence of bullet point two is considered to be overly definitive and does not reflect the circumstances that may be found on any particular site, due to overall orientation, access arrangements, topography or similar. It is proposed that this is amended.</p> <p>Neighbourhood Design Tier Neighbourhood Design Tier, 4.0, page 71 – in common with the introductory comments above, it would be helpful to confirm that this level of design is likely to be relevant to a full application or a reserved matters application to an outline scheme (or part thereof).</p>	<p>This has been amended to read "<i>In residential schemes, parking should be predominantly at the side of dwellings or in secure and well-overlooked parking courts. Driveways should not form the whole of a building's frontage.</i>" The final sentence has been moved to the Neighbourhood Design Tier.</p> <p>Comments noted, and to improve clarity the text has been amended accordingly in line with suggested text.</p> <p>Comments noted, and to improve clarity the text has been amended accordingly in line with suggested text.</p> <p>Comments noted, and to improve clarity the text has been amended accordingly.</p> <p>Comments noted, and to improve clarity the text has been amended accordingly.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Gardens to apartments Outdoor Space for Dwellings, 4.2.4, page 81, fourth bullet point. This proposed garden space requirement for apartments is considered potentially too onerous and potentially inappropriate particularly for schemes in higher density and town centre locations. It is proposed that an additional sentence is added to this point so that it reads as follows: <i>Gardens for apartment buildings should normally provide at least 20m² for each flat in the block. Less provision may be appropriate in higher density central and town centre locations and in locations with good access to open space.</i></p> <p>Recommended Separation Distances, 4.2.5 – this section sets out separation distances between habitable rooms. They are initially established as ‘minimum distances’, however later in the section it is noted that they can be ‘limiting’ and that the Council will encourage and support creative solutions (to delivering reduced separation distances).</p> <p>BXB concur that rigidly applied separation distances and additions to ‘minimum’ standards where there are ground level changes, can be limiting, and can lead to bland, unnecessarily low density, standard design solutions. It is therefore proposed that the first sentence to section 4.2.5 should be amended.</p> <p>Neighbourhood Nature Biodiversity 4.3.2. BXB support the retention of trees and appropriate replacement where trees are lost as a result of development. However, on a site such as Cowley</p>	<p>Comments noted, and to improve clarity the text has been amended accordingly.</p> <p>Comment noted, but it is considered that the minimum distances are adequately qualified in the current wording.</p> <p>Comments noted, but no change proposed as accords with policy contained in the Local Plan, being Policy LPC10: Trees and Woodland; “<i>Where any tree is justifiably lost its replacement will normally be required on at least a 2 for 1 ratio</i>”.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Hill, where former industrial land has become populated by self-seeded trees over time, the reclamation and reuse of the site is not possible without the removal of trees and it is not be feasible, viable or indeed appropriate to replace these trees on a two for one basis.</p> <p>It is therefore proposed that the bullet is amended by the following addition: ‘....., <i>unless the development is on a brownfield regeneration site where this is not feasible or viable</i>’.</p>	
NHS Property Services	<p>Support the priority given towards promoting and securing good quality health and wellbeing within local communities through the embedding of ‘health points’ across the design themes. Health points are incorporated in promoting active travel, designing for safe and attractive streets, access to green spaces fostering better mental health and wellbeing and climate change adaption measures.</p>	Support noted – no changes required.
Peel L&P	<p>Section 1 sets out the Purpose and Planning Policy and the SPD (Section 1.2 National Model Design Code (NMDC)) which makes it clear where a developer intends to prepare a design code for a particular scheme, the scope and content should be agreed with the Council. The SPD needs to be clear that the submission of a Design Code is entirely site-specific, either at the applicant’s discretion or where the Council will require a design code. The process for agreeing a Design Code also needs to be set out including any requirements for community engagement.</p>	<p>The process for agreeing the requirements for or of a design code will be set out in the forthcoming St Helens Design Code. In the meantime, the need for, and scope of, a Design Code will be determined on a case-by-case basis by the Council and the applicant.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Section 3.6 Strategic Checklists sets out that the applicant should determine which variables apply to a proposed application. This is welcomed but it provides no guidance on the level of detail suitable as part of outline e.g., for larger sites or detailed planning applications. Consideration should be given to the level of detail required for different stages of development and application types with an expectation that the completed checklist should be proportionate to the type and nature of the application. It would be useful if this checklist was identified as being specifically for detailed applications.</p> <p>Viability – Within the draft SPD there is no reference to viability which needs to be acknowledged within the overall objectives to secure development.</p>	<p>The checklists can be applied flexibly and not all the variables listed will apply to all sites. An applicant can seek pre-application advice from the Council to determine the level of detail required at each stage. At the Strategic Tier, the level of detail expected for a required design response will be strategic, and could potentially be satisfied by a diagram, for example.</p> <p>The following paragraph on viability has been added to the draft SPD introduction:</p> <p><i>'It is the responsibility of the applicant to take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. Where the principles set out in the SPD impact upon the viability and deliverability of a development, the applicant can argue a case for non-compliance, by preparing a viability appraisal to be shared with the Council. This does not, however, exempt the developer from adopting the design process set out in the SPD in order to achieve the high quality design outcomes required by the NPPF and National Design Guide.'</i></p>
Pegasus Group on behalf of Redrow Homes Ltd	The SPD does not provide a flexible approach to street design, given the focus on perimeter blocks as the preferred layout typology which are more suitable for higher density urban environments. Such a focus risks undermining a key component of	Comments noted, however the stated preference for perimeter blocks within the draft SPD does not preclude layouts based on detached houses. National planning policy requires the Council to plan for the delivery of a wide choice of high-quality homes within sustainable, inclusive, mixed communities, based on

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>housing delivery, particularly for larger detached family homes likely to be delivered by Redrow and other house builders. There is a risk that without revision, the guidance could reduce choice in the housing market and adversely affect housing delivery. Redrow recommends the SPD makes clear other layouts are appropriate, notably in suburban areas where detached family homes form a key part of housing choice in the housing market. As currently drafted, the guidance does not include detached homes defining a perimeter block.</p> <p>The SPD makes numerous references to the inclusion of courtyard parking for residential development.... Redrow object to this – as whilst such car parking solutions are suitable in certain instances, such as in urban areas, a flexible approach to car parking provision should be taken which allows for a range of appropriate parking measures where suitably designed, including frontal and internal garage parking which are important to home buyers... The preferred approach to courtyard parking should be removed from the SPD.</p> <p>Page 91 - Whilst Redrow support the sensitive landscaping and design of car parking areas, siting these away from public view is not considered practical and restricts the use of frontal car parking Reference to siting car parking away from public view should be removed.</p>	<p>sound evidence and to identify the size, type, tenure and range of housing that is required. The Council is seeking to achieve a mix of housing that reflects St Helens Borough’s housing needs. In accordance with national planning policy, this includes providing housing for different groups including those who require affordable housing, families with children, older people, people with disabilities and people wishing to commission or build their own homes. Therefore, any planning application will need to adhere to Local Plan Policy LPC01:Housing Mix.</p> <p>The draft SPD only refers to courtyard parking as a preferred approach in the Residential Street Hierarchy for the two types of Main Street. This is to minimise the number of private driveways accessed off streets with a high movement function and is consistent with Street for a Healthy Life guidance.</p> <p>Elsewhere in the guide courtyard parking is considered alongside other arrangements but is not described as a preferred approach.</p> <p>Each site will have different constraints or opportunities even though site area or number of dwellings may be the same. It is essential that each case is determined on its merit.</p> <p>Comments noted, and reference to siting car parking away from public view has been removed.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Frontal private parking and garage parking should therefore be referenced as appropriate car parking solutions where sensitively designed.</p> <p>The Design SPD makes no reference to the suitability of garages for car parking provision, which should be rectified.</p> <p>Paragraph 43 - Cul-de-sacs should not be dismissed as a suitable design solution.</p> <p>Paragraph 3.5.1 - Redrow wish to highlight that their detached house types also carefully consider sustainability/energy matters which do not necessitate buildings being grouped together for energy efficiency purposes. Furthermore, changes to the Building Regulations and introduction of the Future Homes Standard in 2025 ensure that all house types (regardless of their size and format) are built to be energy efficient via a variety of methods.</p>	<p>Frontal private parking and garaging are referenced in this section; <i>“On-plot parking should be generally accessed from the front with garaging and parking spaces located to the side or rear of a dwelling. This maintains good surveillance from properties and avoids the dominance of vehicles in the street frontage.”</i></p> <p>Garages are referenced in Section 4.4.4 Car Parking; <i>“On-plot parking should be generally accessed from the front with garaging and parking spaces located to the side or rear of a dwelling. This maintains good surveillance from properties and avoids the dominance of vehicles in the street frontage.”</i></p> <p>It’s not clear what section of the draft SPD this comment refers to. The National Design Guide, Manual for Streets 2 and Building / Streets for a Healthy Life all encourage good connectivity principles.</p> <p>Each site will have different constraints or opportunities even though site area or number of dwellings may be the same. It is essential that each case is determined on its merit.</p> <p>Comment noted.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Page 80 - the SPD should clearly state public art should be encouraged only in appropriate schemes, namely of substantial size and in prominent gateway locations. Such a requirement should not be required in every instance.</p> <p>Paragraph 4.2.5 sets out recommended separation distances between dwellings. Redrow advocate a flexible approach on this matter rather than prescriptive distances. There are circumstances where separation distances can be relaxed and do not need to be rigidly adhered to in order to be acceptable from a residential amenity/privacy perspective. Redrow therefore support the paragraph which states achieving typical separation distances can be limiting and the council will encourage and support creative solutions.</p> <p>Page 98 notes that the Council will use the Nationally Described Space Standards (NDSS) to assess the internal space of homes. Where a proposed dwelling is below the NDSS the applicant should provide a justification of why they cannot be met. Redrow object to this as this is seeking to introduce a new requirement that is above adopted planning policy. There is no policy requirement to comply with NDSS in the Local Plan and this has not been tested in respect of viability implications. Reference to NDSS should be removed.</p> <p>Page 115 discusses energy efficiency matters (including a suggestion that glazing to all habitable rooms should not be less than 20% of the internal</p>	<p>Comment noted, and this has been amended to reference large / prominent gateway developments.</p> <p>Comment noted.</p> <p>Comment noted, and reference to NDSS has been amended to remove the onus of justification for dwellings that do not meet the NDSS.</p> <p>Comments noted, and reference to glazing ratios has been removed.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>floor areas of the room). The Building Regulations stipulate energy efficiency requirements for new homes and it is not considered further detail is needed in this regard. We therefore recommend that the SPD makes reference to Building Regulation requirements rather than setting out other methods that could be explored as this is already covered in separate legislation.</p>	
Rainhill Civic Society	Not happy with the timing of the consultation.	Comment noted – no changes required.
Sport England	<p>Sport England would like to draw your attention to its own Active Design guidance. It contains 10 active design principles which inspire and inform the design of the built environment; in a way to promote sport and physical activity and active lifestyles. This guidance could be embedded or referred to in your own design code.</p>	<p>Comments noted. Reference to Sport England has been added to Strategic Design Links side bar and Further Reading appendix.</p>
The Coal Authority	No specific comments to make on any of these draft SPDs.	Comment noted – no changes required.
Torus Developments	<p>Affordable Housing - Pepper Potted - due to the nature and design of sites this might not always be possible. Torus work with developers to create tenure blind developments to ensure a consistency of design regardless of tenure type.</p> <p>Torus have in the past been happy to consider public art as part of contributions/support from local communities within the context of approved costs and affordable, sustainable maintenance.</p>	<p>Comments noted, and to improve clarity the text has been amended as follows: <i>'Affordable dwellings should be evenly distributed throughout the site rather than being concentrated in a particular part of the site. This does not preclude limited grouping of dwellings for functional or management purposes.'</i></p> <p>Comments noted, and text has been amended to reference large / prominent gateway developments.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>20m² for apartment gardens will be difficult to achieve, especially for walk up apartments that does not include bin stores/clothes drying areas. Torus would ask for flexibility on this 20m² figure.</p> <p>18m/23m overlooking distances from first floor can be difficult to achieve, particularly in many of our high-density terraced communities within St Helens - Torus would request that there is flexibility in these overlooking distances.</p> <p>On smaller developments, it may difficult to replace 2 new trees with every tree lost. Some flexibility with discussions with Council Tree Officer on this ratio would be appreciated.</p> <p>Cycle storage cannot always be accommodated within the curtilage of a property - Appt block cycle storage (where required) may be located adjacent to the block.</p> <p>Communal bin storage may not always be possible within the envelope of the building - may be circumstances where the bin storage is located in the car parking court/area adjacent to the building. Free standing bin stores may need to be considered dependant on costs/location.</p> <p>Homes England funding criteria allow for 85% NDSS levels - would Torus need to provide St Helens with a separate justification on a scheme-by-scheme basis or can this be accepted as the HE funding criteria?</p>	<p>Comment noted. Each site will have different constraints or opportunities even though site area or number of dwellings may be the same. It is essential that each case is determined on its merit.</p> <p>Comment noted. Each site will have different constraints or opportunities even though site area or number of dwellings may be the same. It is essential that each case is determined on its merit.</p> <p>Comment noted, however, this is a Local Plan requirement; Policy LPC10: Trees and Woodland.</p> <p>Comment noted, and the SPD states: '<i>Cycle parking in apartment buildings should be indoors or in a secure, covered enclosure and easily accessed from the building entrance.</i>'</p> <p>Comment noted, but no change proposed. It is considered that there is some flexibility in the existing wording of this paragraph to accommodate this.</p> <p>Comment noted, and reference to NDSS has been amended to remove the onus of justification for dwellings that do not meet the NDSS.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>With open plan layouts more common with current designs - 2 separate living rooms may not be possible to achieve.</p> <p>Set back entrances not always possible in a traditional terraced housing arrangement - use of porches/GRP shelters may be possible.</p> <p>Shared core of 8 dwellings per floor per core may not be possible dependant on linear arrangement of design of larger apartment blocks - is there any flexibility on this number?</p> <p>What is defined as a "prominent location?" High close board fences can provide a cost effective, secure by design boundary line for many social housing schemes.</p> <p>4.8m carriageway - is there any flexibility on this figure? Aware of St Helens schemes that have allowed for below this 4.8m level.</p> <p>Really like the residential street hierarchy and will larger developers a real sense of what can be achieved. My only mention would be in relation to the landscape median strips - these strips are not always possible on both sides of the carriageway (due to costs, design, etc) and some flexibility should be allowed on this element.</p>	<p>Comment noted.</p> <p>Comment noted, and this has been amended to include reference to porches / canopies.</p> <p>Comment noted. Each site will have different constraints or opportunities even though site area or number of dwellings may be the same. It is essential that each case is determined on its merit.</p> <p>Comment noted, and this has been clarified and now reads: <i>"High close boarded fences should not be used in locations that project into or enclose the street scene. Spaces that require enclosure and meet the street scene should be demarcated by masonry walling, as appropriate."</i></p> <p>Comment noted, and this has been clarified. 4.8m is considered a maximum carriageway width for Courtyards & Lanes. The principles set out in the SPD will be expanded on in the forthcoming Street Design SPD.</p> <p>Comment noted. Each site will have different constraints or opportunities even though site area or number of dwellings may be the same. It is essential that each case is determined on its merit.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	Various image credit amendments.	Comment noted, and these have been amended.
United Utilities	<p>We request that the SPD outlines to the need for our assets to be fully considered in development proposals at the outset of the design process.</p> <p>We note that the SPD references the importance of design in the context of electricity substations. We request that the SPD also identifies the need to carefully consider the implications of development near to our existing wastewater treatment works, pumping stations and other wastewater assets.</p> <p>When looking at future development within a reservoir flood zone, we draw your attention to the advice within the National Planning Practice Guidance on Flood Risk and Coastal Change. The Design SPD should identify a need for designers to consult with the reservoir owner and operator when appropriate to ascertain any implications for operation and maintenance.</p> <ul style="list-style-type: none"> • Emphasises that the approach to drainage is a key determinant of site design, which must be considered at the outset of the design process. • Identifies a need for the applicant to assess and respond to the existing hydrological characteristics of a site to ensure a flood resilient design is achieved and water / flooding is not deflected or constricted. The hydrological assessment of the site must consider site topography, naturally occurring flow paths, 	<p>Comment noted, but this is adequately covered in paragraph 3.5.2.b: “ <i>Demonstrate how no-build zones associated with public utilities and easements / buffer zones are integrated into the site layout in a coherent way.</i>”</p> <p>Comment noted, and reference to pumping stations has been added to the prompt regarding substations.</p> <p>Comments noted, and reference has been made to the relevant columns.</p> <p>These topics are dealt with at a level that is appropriate for a general design guidance document. Further technical guidance, in the form of St Helens Lead Local Flood Authority documents and SuDS guidance is linked to in the sidebar.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>ephemeral watercourses and any low-lying areas where water naturally accumulates. Resultant layouts must take account of such circumstances and 'make space for water'.</p> <ul style="list-style-type: none"> • Identifies the importance of applying the hierarchy of drainage options for surface water management. The outcome of this investigation will be a critical determinant of site design. For example: • The location of the outfall to a watercourse could affect the location of the associated surface water attenuation storage; and • If infiltration of surface water is deemed suitable, space should be allowed for in the design of the development to ensure that an infiltration system can be incorporated into the design of the site. • Prioritises multi-functional sustainable drainage. Sustainable drainage should be integrated with the landscaped environment, the strategy for net gain and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). • Considers exceedance / overland flow paths from existing and proposed drainage features and confirms ground levels, finished floor levels and drainage details. It is good practice to ensure the external levels fall away from the ground floor level of the proposed buildings (following any 	

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>regrade), to allow for safe overland flow routes within the development and minimise any associated flood risk from overland flows. In addition, where the ground level of the site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not at an increased risk of sewer surcharge. It is good practice for the finished floor levels and manhole cover levels (including those that serve private drainage runs) to be higher than the manhole cover level at the point of connection to the receiving sewer.</p> <ul style="list-style-type: none"> • For any development proposal which is part of a wider development / allocation, foul and surface water strategies must be part of a holistic site-wide strategy. A proliferation of pumping stations on a phased development should be minimised where possible. • Ensures that the design of the site has regard to necessary management and maintenance arrangements for SuDS including any necessary management and maintenance for on-site watercourses. • Any proposals on brownfield land, including any public realm improvements, should identify and implement improvements to surface water management, for example, by turning 'grey to green'. This could be achieved through a variety of features including permeable surfacing; 	

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>bioretention tree pits and landscaping; rain gardens; soakaways and filter drainage; retrofitted swales; and blue/green roofs. We recommend that you refer to the Susdrain website which includes a range of case studies that show examples of how SuDS have been implemented in the urban environment. Interesting examples include Grey to Green Phase 1, Sheffield; and Crescent Gardens SuDS project, High Road, Haringey.</p> <p>We request that the Design SPD emphasises the need for landscaping proposals, including proposals for tree-lined streets, to be integrated with the strategy for sustainable surface water management. The SPD should require landscaping proposals to evaluate and identify opportunities for sustainable surface water management.</p> <p>The Design SPD should note that any approach to planting new trees must give due consideration to the impact on utility services noting the implications that can arise as a result of planting too close to utility services.</p> <p>We support the references to water efficiency measures in the draft Design SPD. We encourage local planning authorities and applicants to build new residential development in accordance with the optional water efficiency standard prescribed in Building Regulations of 110 litres per head per day.</p>	<p>Comment noted, but this is covered in the Nature section of the draft SPD.</p> <p>Comment noted, and this has been added to Neighbourhood : Nature: Biodiversity. The prompt now reads; "Specify types of street tree and demonstrate that they have the room to mature without impacting neighbouring buildings <u>or utilities.</u>"</p> <p>Supported noted.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>We wish to highlight that new development sites are more appropriately located away from locations which are identified as sensitive groundwater protection areas especially within and adjacent to Groundwater Source Protection Zone 1 (SPZ1) which is closest to the water abstraction point and the most sensitive. This is of relevance given the presence of SPZs in St Helens. The location of SPZs can be found on gov.uk. Where development is proposed in a SPZ, the Design SPD should identify the need for proposals to accord with the latest national guidance on Groundwater Protection.</p>	<p>These topics are dealt with at a level that is considered appropriate for a general design guidance document. Further technical guidance, in the form of St Helens Lead Local Flood Authority documents and SuDS guidance is linked to in the sidebar.</p>
<p>WSP on behalf of Barratt / David Wilson Homes</p>	<p>We suggest that this role as a guide, and the ability for designers to display innovation, originality and initiative, whilst promoting or reinforcing local distinctiveness, should be further emphasised within the SPD Introduction and Section 1.3.</p> <p>The length of the draft Design Guide, at some 80 pages, is likely to affect the usability of the guide.</p> <p>For the avoidance of doubt, it should be made clear that where site-specific guidance is adopted (Local Plan) and/or approved, that site-specific guidance should take precedence above general district-wide design guidance tool.</p> <p>BDW requests that the consultation process set out for planning applications, as outlined at Figure 7, is refined to enable a more flexible and realistic approach. The flow chart implies a requirement for</p>	<p>Comment noted, the SPD is referred to as guidance in Section 1.1 and it is considered that the 'Analysis & Response' structure of the SPD encourages 'innovation, originality and initiative' on the part of designers.</p> <p>Comment noted, but design is a broad topic and the SPD is structured so that applicants can find relevant guidance without reading the whole document.</p> <p>Comments noted. Each site will have different constraints or opportunities even though site area or number of dwellings may be the same. It is essential that each case is determined on its merit.</p> <p>Comments noted, and a balance has to be reached between providing rigid guidance and flexible guidance. It is considered that the draft SPD provides the right balance. Furthermore, the Council has a pre-application service to improve consistency</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>three separate design reviews and three consultation stages prior to submission of large developments. When combined with the policies for strategic sites, the intention to require Masterplans, and the role of the Design Guide, the proposed approach seems to be disproportionate, inflexible and unrealistic to apply to all applications.</p> <p>The general thrust of the chapters need to be condensed and simplified for example Sections 2.3, 4.3 and 5.3 all deal with nature, these could be covered within the upcoming draft Nature SPD.</p> <p>Section 3 is primarily aimed at supporting major and strategic development, but there is no specific acknowledgement in the SPD of the strategic new places that are being proposed in the Borough to accommodate St Helen’s housing need – and in particular how these relate to the place making aims of the document.</p> <p>A more general observation is the continued use of “must” throughout the draft SPD, which in effect removes any opportunity for an iterative design process to be achieved that is appropriate to the intrinsic characteristics of a scheme. The NPPF uses “should” and “where practicable” which allows for due consideration of an effective alternative.</p>	<p>and advice, that allows a smoother determination of any subsequent planning application. As above each site will have different constraints or opportunities and therefore each application will be determined on a case by case basis.</p> <p>Comments noted, but design is a broad topic incorporating many specialisms that are not siloed; nature and landscape are key considerations within the design process. The draft SPD is structured so that applicants can find relevant guidance without reading the whole document.</p> <p>A Strategic Objective of the Local Plan is to promote the creation of a well-designed environment by supporting proposals for high quality development. The draft SPD does not consider specific sites but provides general guidance for use by people applying for planning permission to ensure they provide quality development within the Borough.</p> <p>The draft SPD has been informed by the National Design Guide and the National Model Design Code. The NMDC seeks to make design guidance clear and binary. ‘Musts’ is only used in circumstances where the particular variable is considered fundamental for achieving good design.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Section 5.1.1 of the SPD states that the Council will use the NDSS to assess the internal space of proposed new homes. BDW wishes to object to this.</p> <p>Wish to object to the recommended the minimum distances that should be left between buildings as set out in Paragraph 4.2.5. request that this section is justified with robust evidence</p> <p>Section 2.3 Context and Nature – details how applicants should take into account the topography of a site however BDW believes that insufficient weight is attributed to such constraints with the SPD document and how these can have an impact in layout, pattern of development, plot sizes and relationships between visual amenity.</p> <p>In terms of designing around sites which are significantly constrained by topography, the document lacks content in terms of identifying the need to install retaining walls in some instances and</p>	<p>Comment noted, and reference to NDSS has been amended to remove the onus of justification for dwellings that do not meet the NDSS.</p> <p>Comments noted, but there are a number of paragraphs in this section that state that minimum distances will be applied flexibly and no changes are proposed:</p> <p><i>'The guidelines should generally be followed, but it is important to consider the design of the development, and its relationship to the character of the surrounding area...</i></p> <p><i>Achieving typical separation distances can be limiting and the Council will encourage and support creative solutions to ensure that visual and acoustic privacy, light, and outlook can be achieved...</i></p> <p><i>If the proposed development does not exactly meet the recommended distances, the rationale should be justified in the Design and Access Statement.'</i></p> <p>Comments noted, but whilst the draft SPD is comprehensive it cannot cover every design issue. Proposed layouts will be considered on a case-by-case basis with acknowledgement of site opportunities and constraints.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>does not demonstrate how creative design solutions can be administered to facilitate development in highly constrained conditions.</p> <p>The SPD requires amendment to include reference throughout to viability.</p> <p>Section 3.4 contains detailed requirements for surfacing types/materials according to street hierarchies throughout a development. BDW believe that reference should be made here in the need to balance the requirements for materials which is linked to the character of the development and how this could influence viability of a site.</p> <p>With regards to parking provision, the guidance is contradictory at times for example Section 3.2 – Strategic Identity proposes that layouts, plot sizes and relationships between building plots ensure adequate space for servicing, gardens and car parking while at the same time, the same section proposes that active frontages dominate with car parking located out of site. Section 4.4 proposes that car parking should be integrated into the overall layout and design of new development with on-plot parking to be accessed from the front.</p> <p>In terms of frontage parking, the guidance is not clear in terms of the level of frontage parking which is deemed acceptable. Whilst the guidance states</p>	<p>Comment noted, and the following paragraph on viability has been added to the draft SPD introduction:</p> <p><i>'It is the responsibility of the applicant to take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. Where the principles set out in the SPD impact upon the viability and deliverability of a development, the applicant can argue a case for non-compliance, by preparing a viability appraisal to be shared with the Council. This does not, however, exempt the developer from adopting the design process set out in the SPD in order to achieve the high quality design outcomes required by the NPPF and National Design Guide.'</i></p> <p>Comments noted, and car parking guidance has been reworded. The reference to 'out of site' has been removed. It is however considered that the provision of both adequate space for car parking and active frontages should be achievable.</p> <p>Comment noted, but it would be too proscriptive to give specific guidance on the level of frontage parking that is deemed acceptable. It will necessarily be decided on a case-by-case</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	that frontage parking can be softened by street trees and high-quality material palette, particular reference needs to be made to how frontage parking is expected to be dealt with at major development scale and also already allocated sites.	basis and depend on the character of the development and the quality of materials and landscaping.

St Helens Borough Council Developer Contributions SPD – Consultation Responses

The draft Developer Contributions SPD sets out St Helens Borough Council’s approach to seeking developer contributions and is relevant to all development proposals (including residential, employment and retail).

Its purpose is to outline the Council’s approach to seeking contributions including the basis for requiring a contribution, viability testing and pre-application engagement requirements. It explains how specific contributions will be calculated, delivered, monitored, including consideration of future maintenance, management and retention in perpetuity of new infrastructure and facilities.

It covers the following types of requirements and infrastructure:

- Affordable Housing
- Biodiversity
- LCR Recreation Mitigation (mitigating recreational impacts on European protected sites)
- Bold Forest Park
- Education
- Flood Risk, Water Management & Sustainable Drainage
- Healthcare
- Public Open Space & Outdoor Sports Provision
- Public Realm
- Social and Community
- Transport

The following table summarises the responses received in relation to the draft Developer Contributions SPD, and includes the Council’s response to each of the comments. Appendix B includes a Table of Changes proposed for the draft Developer Contributions SPD.

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
Active Travel England	The statutory consultee role of Active Travel England (ATE) does not extend to local planning or planning policy, therefore ATE will not respond on this occasion.	Comments noted, and no changes required.

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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<p>Asteer Planning on behalf of Wain Estates (Land) Limited</p>	<p>Local Plan Policy LPA07 lacks the clarity needed for applicants to know what exactly development will be expected and required to contribute towards.</p> <p>Aware that the current lack of clarity causes issues in practice with required contributions still being negotiated deep into the determination period of planning applications, particularly when schemes are marginally viable (or worse). Many development proposals will have several contributions sought that fall within the same level of the hierarchy and the policy does not provide any clarity on how this will be dealt with at the application stage.</p> <p>Strongly advocates pre-application engagement however, important to note that in relation to delivering major development, the planning process typically begins much earlier than this. For example, when development sites are being marketed and landowners / developers / land promoters are preparing bids and negotiating land deals, that is critical for ensuring the timely delivery of housing to meet the borough's needs.</p> <p>It should provide more clarity on how contributions will be calculated, evidenced and viability tested at an earlier stage in the process so that applicants are more informed, earlier in the planning process which would reduce what are often unnecessary delays later in the process approaching the submission and following determination of an application.</p>	<p>Comment noted, and the Council are committed to proactively working with developers when negotiations on infrastructure occur. It is with a view to the possibility of scenarios of this nature that the SPD has been produced. No changes required.</p> <p>The infrastructure need generated by the development would be considered at pre-application or at application stage. At this stage appropriate stakeholders will be informed, and their views taken into account when assessing infrastructure needs. The SPD is intended to explain the approach to formulating the content of contributions in circumstances where prioritisation may arise. All contributions sought will be subject to the CIL Tests.</p> <p>Comments noted, and no changes required.</p> <p>The Council has a pre-application service to improve consistency and advice, and the determination of any subsequent planning application. Where possible, the Council will work with appropriate stakeholders at this stage. Pre-application advice from the Council is strongly encouraged (paragraph 3.9) to determine content of s106 agreements.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Paragraphs 3.1-3.8 do very little to add any clarity to the process but rather summarise and re-state the policy wording without providing any further clarity or means by which to differentiate between developer contributions within the same category; or, which contributions would be prioritised by the Council should viability be an issue on a site.</p> <p>Table 2.1 identifies the key source of information for development proposals as the Bold Forest Park Area Action Plan (2017). This document is now 7 years old and does not provide specific information with regards to the delivery of the BFGV allocation within the Area Action Plan area. Therefore, this SPD must make clear that the 'Bold Forest Park' section of the SPD relates only to sites within the Bold Forest Park area, but outside the BFGV Masterplan SPD boundary.</p> <p><u>Affordable Housing</u> The SPD does not provide a definition of 'affordable housing', with no mention of 'First Homes' or how in some situations 'discounted market' dwellings could satisfy the needs and requirements for affordable housing. SHMBC should use this SPD to provide clarity on how it will apply the requirement for First Homes to planning applications.</p> <p><u>Biodiversity</u> The SPD appears to omit detail on how provision of mitigation on other land (when on-site provision is not feasible) will be dealt with, ahead of (in terms of</p>	<p>Each site will have different constraints or opportunities even though site area or number of dwellings may be the same. It is essential that each case is determined on its merit.</p> <p>Comment noted, but it is considered that this section is clearly referring to the Bold Forest Park as a whole and not specifically allocated housing site 4HA (Bold Forest Garden Village).</p> <p>The BFGV Masterplan SPD will have to have regard to all development plan policies, including those of the Bold Forest Park Area Action Plan (2017). No changes required.</p> <p><u>Affordable Housing</u> The draft SPD refers to the definition of affordable housing as set out in national planning policy (paragraph 2.6) to ensure it remains up-to-date. The St Helens Affordable Housing SPD (2010) will be updated as necessary to assist the implementation of Policy LPC02 and provide more clarity. A future Local Plan will further address a First Homes policy requirement.</p> <p><u>Biodiversity</u> Comments noted, and text will be amended to include obligations in context of the Biodiversity Net Gain Regulations 2024. Adherence to these and its guidance provides significant information for developers to address the issue of both off and</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>mitigation hierarchy) a financial contribution being made for off-site provision.</p> <p>The SPD makes no mention of whether the Council will expect any off-site contributions to be calculated/provided locally, or how this would need to be evidenced, prior to the option of purchasing mandatory credits (as set out in Government/Defra guidance in relation to mandatory BNG).</p> <p>These issues are particularly important in relation to large strategic sites like BFGV where individual applications may not be able to provide on-site mitigation, but overall mitigation could be provided within the wider allocation/masterplan area. A comprehensive approach is required and should be addressed by the BFGV Masterplan SPD as well as the Developer Contributions SPD.</p> <p><u>Recreation Mitigation Strategy</u> Reserve the right to comment on any further detail provided and the Council's approach, at the appropriate time.</p> <p><u>Education</u> Further detail and clarity should be added to the SPD in relation to how education contributions from applications within sites such as BFGV will work, where a new school is likely to be provided on-site. For example, requiring applications to fund the physical delivery of a school and/or land for a school may result in viability and deliverability challenges if contributions towards school places are also sought.</p>	<p>onsite issues. Further guidance (to be prepared) from the Council and Liverpool City Region will provide additional information on addressing local off-site provision.</p> <p>Comment noted, but the draft SPD does not consider specific sites but provides general guidance for use by people applying for planning permission to ensure they address open space provision. The BFGV Masterplan SPD will cover this issue.</p> <p><u>Recreation Mitigation Strategy</u> Commented noted, and no changes required.</p> <p><u>Education</u> The need for a new school on housing allocation 4HA (BFGV) will be considered through the masterplanning stage of the site. The draft Developer Contributions SPD will not commit to specific site related issues. No changes required.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>This matter of equitable contributions towards key infrastructure is something that the BFGV Masterplan SPD will need to address in detail and provide clarity for applicants and developers early in the process.</p> <p><u>Summary</u> The SPD should include sufficient flexibility (e.g. referring to the BFGV Masterplan SPD) to ensure that contributions requested from applications within the BFGV do not threaten the viability and/or delivery of individual parcels and/or the wider BFGV site. The Developer Contributions SPD should make the relationship between the Local Plan Policies (LPA07 and LPA11) and the various SPDs very clear to avoid any confusion and/or delays as a result of multiple policy documents being used to calculate and/or justify contributions from applications within the BFGV.</p>	<p>The draft SPD does not consider specific sites. The Council recognises that developer contributions are negotiable, and it's noted that monetary contributions may be either increased, decreased, or removed following discussions between the Planning Authority and the applicant. Chapter 3 recognises that there will be negotiation over the level of contributions sought, which will include consideration of viability. It is not considered that further clarification is required in the SPD.</p>
Canal and River Trust	<p>The trust has no specific comments to make. There are long-term aspirations to restore the former St Helens Canal (Sankey valley Park) to water. Although the Trust do not own the former canal to be restored they would support any developer contributions that may be able to be secured to restore the canal or to maximise its use as a recreational/leisure route.</p>	<p>Comment noted, and no changes required.</p>
Education Department, St Helens Borough Council	<p>Paragraph 2.46, p26 states 'no standard capacity assessment for SEND'. For the first time we have had to provide a SEND SCAP this year and the DfE now provide a Special School Net Capacity Assessment tool for LAs to use.</p>	<p>Comments noted, and text will be amended to include this latest position.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Footnote 13, the rounding was relevant for the previous methodology, but probably not for the new methodology.</p> <p>Text in blue box, p28, should include ‘shortfall or additional need for....’ Early years places as well, as new early year entitlements are due to be rolled out from next year.</p>	<p>Comments noted, and the footnote will be deleted accordingly.</p> <p>Comments noted, and text will be amended to include reference to early years.</p>
Frost Planning on behalf of English Land	<p>The SPD’s duplicate much of existing national and local policy. They are too detailed, confusing, unwieldy to understand, and impractical to use. They should be shorter and simpler toolkits for all to use.</p> <p>All SPDs fail to recognise that many employment sites are difficult to deliver on viability grounds. The SPDs impose layers of additional financial and other obligations (e.g. design, BNG, open space, travel plans), therefore any SPDs should exclude key employment sites and sites that benefit from extant planning permissions.</p>	<p>Comments noted, however any new proposals for development on a site allocated within the Local Plan or with extant planning consent will still need to adhere to all relevant policies, including specific requirements as set out in Appendix 5.</p> <p>The draft SPDs do not introduce new policy, but rather provide additional guidance and clarity of existing policies contained in the development plan.</p> <p>The Council recognises that developer contributions are negotiable, and it’s noted that monetary contributions may be either increased, decreased, or removed following discussions between the Planning Authority and the applicant. Chapter 3 recognises that there will be negotiation over the level of contributions sought, which will include consideration of viability. It is not considered that further clarification is required in the draft SPD.</p>
Historic England	Encourage the consideration of the historic environment in the production of your SPDs. Advice that we seek advice from the local authority conservation officer and from the appropriate archaeological staff, who best placed to provide information on the historic environment.	Comments noted, and no changes required.

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
Knowsley Council	<p>Some of the wording in this SPD contradicts the Transport and Travel SPD.</p> <p>Paragraph 2.114 does not mention “neighbouring authorities” as in the Transport and Travel SPD.</p> <p>Reference should be made to cross border impacts or neighbouring authorities</p>	<p>Comments noted, and to ensure consistency between both this SPD and the draft Transport and Travel SPD, text will be amended as follows:</p> <p>Change - Insert new section in Chapter 3 entitled “<u>Cross-Boundary Developments</u>”.</p> <p><u>3.13 Where an application site lies immediately adjacent to or partially within a neighbouring local authority area, St Helens Borough Council will work closely with the relevant authority to ensure that infrastructure provided meets the needs of all authorities affected by the development.</u></p>
Lead Local Flood Authority, Lancashire County Council	As the proposals lie outside of the Lancashire County boundary – no comments to make.	Comment noted, and no changes required.
Lead Local Flood Authority, St Helens Borough Council	<p>There is no mention of the potential SAB being enacted but given the current government delay and stance this is not unexpected. Any changes in the legislation can be picked up in the separate SuDS Guidance document.</p> <p>The LLFA welcome the acknowledgement and breakdown of flood risk and the management of Surface water identified in this document. LLFA support this document.</p>	Comments noted, and reference to the SAB is noted in footnote 16 (previous footnote 17). The footnote will be updated to reference any changes in legislation will be picked up in a separate SuDS Guidance note.
Lichfields on behalf of Taylor Wimpey and Story Homes	<p><u>Affordable Housing</u></p> <p>Note that a commuted sum calculation method has been included within the SPD, however it is critical that a degree of flexibility can be built into the calculation. Viability should be explained further in the SPD.</p>	<p><u>Affordable Housing</u></p> <p>The preferred approach will always be for on-site provision unless a scheme adheres with Local Plan Policy LPC02: Affordable Housing, Parts 4 & 5, which sets out how the provision of affordable housing may vary on a site-by-site basis taking into account evidence of local need and economic viability. This policy already takes account of viability along with Local Plan Policy LPA07: Infrastructure Delivery and Funding.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p><u>Biodiversity</u> This section of the SPD does not give any clarity on the calculation method to be used to secure contributions, arrangements for long-term management and maintenance. No calculation method is provided to identify the financial contributions for off-site measures to offset the impact of the development.</p> <p>The Local Plan's Viability Assessment did not account for BNG and so the Council need to be cognisant of additional strain being placed on developers to deliver appropriate mitigation, replacement or compensatory measures. It should be noted within the SPD that a flexible approach will be applied to ensure that on-site/off-site financial contributions are applied equally and proportionately across large scale strategic / masterplan areas as a whole.</p> <p>The draft SPD document also fails to refer to the relevant, and recently updated biodiversity net gain Regulations.</p> <p><u>Recreation Mitigation</u> Should be removed from the SPD as SPDs should not seek to introduce new contributions in addition to those already introduced through the Local Plan.</p> <p>Bold Forest Park</p>	<p><u>Biodiversity</u> Comments noted, and text will be updated and amended accordingly to include obligations in context of the Biodiversity Net Gain Regulations 2024. Adherence to these and its guidance provides significant information for developers to address the issue of both off and onsite issues. Further guidance (to be prepared) from the Council and Liverpool City Region will provide additional information on addressing local off-site provision. The consideration of financial impacts is something the developer will have to consider as the requirements for Biodiversity Net Gain are statutory and not linked to viability assessment.</p> <p><u>Recreation Mitigation</u> Recreation mitigation has been recognised in the Local Plan and it is anticipated that any developer contributions sought in St Helens will be focussed at least in part on the delivery of strategic greenspace enhancements in the local area, for example at Bold Forest Park.</p> <p>Bold Forest Park</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>It is unclear how the draft SPD will sit in the context of the emerging Bold Forest Garden Village Masterplan SPD and the adopted Bold Forest Park Area Action Plan (2017). Further clarity is required to ensure that each document sets out consistent requirements and no uncertainty is created through duplication.</p> <p>In its current form, there is no detail to understand how equalisation will be applied to the contributions between landowners to deliver the required infrastructure within the Bold Forest Park Area, or any large-scale allocation. This position should be clearly articulated within the draft SPD document.</p> <p><u>Education</u> Supportive of consulting the Council's School Place Planning Team on all major planning applications for residential development. However, it is critical that the Department for Education data is available and published annually to ensure the correct levels of contributions are identified and requested. In the context of large allocations/masterplans, clarity is required to understand how equalisation will be applied to ensure contributions are sought equally amongst different landowners within these areas, whilst being cognisant of viability.</p> <p><u>Flood Risk, Water Management and Sustainable Drainage</u> Supportive, in principle, of the need for s106 agreements to ensure the effective maintenance of both on and off-site flood risk management and</p>	<p>This draft SPD does not consider specific sites but provides general guidance for the Council's approach to seeking developer contributions. Therefore, the issue of equalisation will be addressed in the Bold Forest Garden Village Masterplan SPD, which will be specific to that site.</p> <p><u>Education</u> Comments noted. Education assessments will be provided together with detailed calculations at pre-application and application stage.</p> <p>Equalisation will be dealt with through the masterplanning process required for larger allocated sites. This SPD will not comment on individual sites.</p> <p><u>Flood Risk, Water Management and Sustainable Drainage</u> Comments noted. Equalisation will be dealt with through the masterplanning process required for larger allocated sites. This draft SPD will not comment on individual sites.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>drainage infrastructure. In the case of large-scale strategic sites/masterplan areas, it is important that the SPD acknowledges that there is a need to balance certainty in delivery of key drainage related infrastructure, with the need to maintain flexibility over the delivery of the development. As noted previously in this representation, it is critical that contributions for Flood Risk, Water Management and Sustainable Drainage are proportionate, and a method to ensure equalisation is applied across large strategic allocations/masterplan areas.</p> <p><u>Healthcare Provision</u> Paragraph 2.74 states that there are two elements relating to health provision. There should be emphasis for contributions to be made to enhance existing health provision in a given location. This should include the expansion of existing facilities. The SPD does not, in its current form, set out how healthcare contributions will be calculated. In respect of delivering new health centres, we are supportive that this would need to be agreed with the Council and it's NHS partners as part of the pre-application process, taking account of development viability. As noted previously, it is important that contributions for improvements to existing facilities, or the delivery of new health centres should be applied equally when considered in the context of large-scale strategic sites/masterplan areas.</p>	<p><u>Healthcare Provision</u> Comments noted. Paragraph 2.75 sets out how the enhancement of existing health provision will be sought. The Integrated Care Board (ICB) will be the key consultee to inform decision makers of required mitigation for any development's impact on the local primary healthcare system. The form and amount of mitigation through additional practice floorspace will depend on a range of factors to be determined at the point of application such as the capacity in existing practices. Guidance will be sought from the ICB on the amount of additional practice capacity required as a result of the development's expected population growth, the best option to provide this and where (e.g. extension, branch surgery, new practice etc), and the expected costs per square metre to deliver the necessary floorspace.</p> <p>It is considered that this information can be most up to date if provided to the applicant at the point of pre-application engagement.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p><u>Public Open Space and Outdoor Sports Provision</u> Acknowledge that larger residential development may be expected to provide certain types of open space to provide local recreational opportunities which will enhance the sustainability of development. The draft Open Space Provision and Enhancement SPD should recognise that each development proposal needs to be considered on a case-by-case basis, and any surplus public open space and outdoor sports provision within the local area could offset the need to secure this contribution. This section should be removed from this draft SPD.</p> <p><u>Public Realm</u> Supportive of the Council seeking financial contributions towards the provision or improvement of public realm on a case-by-case basis.</p> <p><u>Social and Community Facilities and Provision</u> Supportive of the Council considering, on a case-by-case basis, where there is a demonstrable need for the on-site provision of community facilities, particularly on strategic sites.</p> <p>However, bringing forward this type of development within large scale strategic sites/ masterplan areas will need to be considered in detail. The Council must clearly and robustly demonstrate that there is a</p>	<p>As above, the question of equalisation will be dealt with through the masterplanning process required for larger allocated sites. This is not a matter for this SPD to address and it will not comment on individual sites.</p> <p><u>Public Open Space and Outdoor Sports Provision</u> Paragraph 3.2 of the draft Open Space Provision and Enhancement SPD, clearly states that applications will be considered on a case-by-case basis. The draft Developer Contributions SPD covers the types of contributions most commonly sought in relation to planning applications, and therefore reference to Open Space will remain and applicants/ developers will be directed to the Open Space Enhancement and Provision SPD for further information.</p> <p><u>Public Realm</u> Support welcomed and noted.</p> <p><u>Social and Community Facilities and Provision</u> The purpose of this draft SPD is not to identify the content or value of potential obligations, which in any event vary depending on the application proposed, its location and vary over time. The draft SPD is intended to explain the approach to formulating the content of contributions in circumstances where prioritisation may arise. All contributions sought will be subject to the CIL Tests.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>need for onsite provision. If a landowner is required to deliver on-site provision of community facilities, other contributions should be offset by the Council. The SPD does not, in its current form, set out how Social and Community Facilities and Provision will be calculated.</p> <p><u>Transport</u> Supportive of the requirement to submit a Transport Assessment or Transport Statement with applications for development generating significant amounts of transport movement. However, the thresholds for what is considered to be 'significant' amounts of transport movement should be clarified. The SPD does not, in its current form, set out how contributions for transport related infrastructure will be calculated, or identified. This section should be removed and covered in the draft Transport and Travel SPD.</p> <p><u>Overview</u> It is critical that the interrelationship between the existing Bold Forest Area Action Plan, the emerging Bold Forest Garden Village SPD and the draft Developer Contributions SPD is aligned to ensure there are no inconsistencies between the aspirations of the documents. The relationship between, and weight given to each SPD should be set out clearly at the outset of each SPD.</p> <p>The SPD should clearly acknowledge the need to apply development contributions flexibly to respond to changes over time. This is especially important for</p>	<p>Where this type of development is proposed on larger strategic sites, full consideration should be made at the masterplanning stage as required under Local Plan Policies LPA03.1 and LPA04.1.</p> <p><u>Transport</u> The draft Developer Contributions SPD covers the types of contributions most commonly sought in relation to planning applications, and therefore reference to Transport and Travel will remain and applicants/ developers will be directed to the Transport and Travel SPD for further information.</p> <p>The infrastructure need generated by the proposal would be considered at pre-application or at application stage. At this stage appropriate stakeholders will be informed and their views taken into account when assessing infrastructure needs.</p> <p><u>Overview</u> Each site will have different constraints or opportunities even though site area or number of dwellings may be the same. It is essential that each case is determined on its merit. This SPD will not comment on individual sites. When producing SPDs careful attention is taken to ensure a consistent approach is undertaken. SPDs should not introduce new policy, therefore all SPDs should align with development plan policies.</p> <p>Local Plan Policy LPA07, Part 3 sets out how phased development should coincide with the provision of such infrastructure or capacity. Paragraph 4.1 of the draft SPD sets</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>the delivery of large-scale strategic sites whereby infrastructure should be provided in a phased approach to reduce/mitigate the impact of development.</p> <p>The SPD should be reviewed periodically to take account of changes in national policy and ensure that sites can deliver homes that meet the needs of the area at the time whilst remaining cognisant of viability considerations.</p> <p>The weight given to this SPD will be up to the discretion of the decision maker. In the context of large strategic sites/masterplan areas, this could allow parties to resist contributions towards key infrastructure and case delivery issues. The Council should include a robust framework to ensure that contributions for infrastructure are secured.</p> <p>Developers need to understand how contributions will be calculated so that the viability of bringing a site forward is understood from the outset. In its current form, the draft SPD does not give a clear indication of how contributions will be calculated. Given the technical nature of developer contributions, it is considered that the SPD should provide a high level of detail regarding calculations. The intended purpose of the SPD is to increase clarity and reduce ambiguity regarding the degree and form that developer contributions will be fulfilled.</p> <p>In line with Policy LPA07, the draft SPD has set out a hierarchy of contributions. We are supportive of</p>	<p>out how in the case of a large-scale development, it may be that the payments would be phased to meet the proportional impact of each phase.</p> <p>Comment noted, and no changes required.</p> <p>Comment noted, and no changes required.</p> <p>The purpose of the draft SPD is not to identify the content or value of potential obligations, which in any event vary depending on the application proposed, its location and vary over time. The SPD is intended to explain the approach to formulating the content of contributions in circumstances where prioritisation may arise. All contributions sought will be subject to the CIL Tests.</p> <p>Pre-application advice from the Council is strongly encouraged (paragraph 3.9) to determine content of s106 agreements.</p> <p>The Council is confident that there is sufficient flexibility within Local Plan policies to react to market changes.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>where contributions are considered entirely necessary to make the scheme acceptable in planning terms. However, viability has to be given significant importance to ensure enough homes are delivered to meet St Helens' identified need over the Plan period.</p>	
Mersey Forest	<p>Whilst tree planting through developer contributions is positive, it means The Mersey Forest are not able to fund tree planting through grants on those sites. Therefore, we encourage green spaces are created through developer contributions and then The Mersey Forest can create woodland on those green spaces at a high standard using government funding through schemes like Trees for Climate. This combination of funding maximises the quality of green spaces to support biodiversity, climate mitigation, and public health and wellbeing.</p> <p>Spatial policies for St Helens can be used as a guide to direct developer contributions.</p>	<p>Comments noted, however, whilst the principle of looking for and providing greenspaces where tree planting opportunities can be found for Mersey Forest, the provision linked to planning applications is governed by the statutory requirements of the Environment Act and its associated regulations and statutory instruments so constrains the flexibility the Council may have to make such provision.</p>
National Highways	<p>Overall supportive, that reflects many of their own policies and objectives. It would be useful to mention National Highways policy within DfT Circular 01/2022, which makes reference to both sustainable and active travel. Our move away from a 'predict and provide' approach to transport assessments to sites being more vision-led encourages developers to consider the transport plan for the entire site at the early stages of development, placing greater emphasis on sustainability.</p> <p>Recommend highlighting to developers that they should enter into pre-application discussions where</p>	<p>Comments noted, the following additional text has been added to the draft SPD.</p> <p><i>'For all proposals, applicants are encouraged to engage with the Council at the pre-application stage, and National Highways when proposals may impact the Strategic Road Network.'</i></p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>there may be an impact to the SRN, especially when it is likely that physical highway mitigation will be required.</p>	
Network Rail	<p>Network Rail seeks to support economic growth and connectivity, through targeting investment across the network. The LPA's strategy for Developer Contributions should identify infrastructure needs in relation to the rail network, recognising opportunities for targeted investment.</p>	<p>The draft SPD covers the types of contributions most commonly sought in relation to planning applications. Each application will be considered on a case-by-case basis and, when required, other necessary contributions may be identified. Requests for developer contributions for rail infrastructure would need to satisfy the CIL regulations.</p>
NHS Property Services	<p>NHSPS supports the seeking of contributions to mitigate the impacts of development on local infrastructure, however, propose amendments to provide greater clarity and consistency with other authorities in the Chesire and Merseyside ICB area.</p> <p>Paragraph 2.74, please delete paragraph text and replace with: <i>2.74 Planning obligations relating to health provision are usually sought in one of two ways. Firstly, to mitigate the impact of development on the existing level of health provision in the area local to the site through extension, refurbishment and/or reconfiguration of existing facilities. Secondly, where there is the need to secure a new health facility as part of largescale development of a strategic nature, or where a number of developments coming forward in an area collectively require the delivery of a new facility.</i></p> <p>Paragraph 2.76 please amend the subheading to: <u>Larger and Strategic Development Requirements</u></p>	<p>Comments noted. The suggested changes add clarity and therefore text will be amended accordingly.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Paragraph 2.76 please delete paragraph text and replace with: <i>2.76 An assessment will first be made as to whether existing facilities in the surrounding area can accommodate the increase in patients arising from the development. Where a development proposal is of such magnitude that it would result in an increase in population that cannot be accommodated by existing health provision, developer contributions will be sought. This may include works such as refurbishment, reconfiguration or an extension to existing health facilities, or in some instances may justify the delivery of a new health facility. The Council will seek to secure the land at zero cost and then contributions towards the delivery of a health centre.</i></p> <p>Paragraph 2.77, please delete the following text to ensure that development proposals that do not undertake a pre-application are covered by this statement: <i>2.77 The mechanism for delivering a new health centre will need to be agreed with the Council and its NHS Partners as part of the pre-application process, taking into account development viability.</i></p>	
Peel L&P	<p>More clarity of what development will be expected to include or contribute to is welcomed.</p> <p>In regard to Education, where a development does not generate the need for an entire school it needs to be made clear how the proportion / additional land will be allowed for as it not required to mitigate the impact of development. The potential required area</p>	<p>Comment noted, but no changes made.</p> <p>Comments noted, and Appendix 2 will be deleted, as it is not considered necessary. Paragraphs 2.42 and 2.43 and footnotes 11 & 12, refer to new schools being built in line with guidance contained in the DfE Building Bulletin 103 or any subsequent relevant updates.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>of land required is shown in Appendix 2 which needs to be broken down to demonstrate how it has been interpreted and complies with Building Bulletin 103 including assumptions for playing fields and any nursery provision.</p>	
<p>Pegasus Group on behalf of Redrow Homes Ltd</p>	<p>This draft SPD still seeks to apply new standard formula in relation to new infrastructure items. This is entirely at odds with the NPPG and therefore such changes must be developed through a full review of the Local Plan and not through this SPD. In short, this means very limited weight will be afforded to the SPD as a material consideration if not rectified. We assume this is therefore at odds with the Council's rationale for preparing the SPD.</p> <p>Wish to highlight additional costs associated with housing delivery in recent years and the cumulative impact of the dozen changes to the regulatory and tax environment for house builders amounts to the equivalent of around £22,000 per new home, more than half of the national average developer contribution value per plot seen in recent years.</p> <p><u>Affordable Housing</u> The calculation is based on a 14yr old document. We encourage preparation of an updated Affordable Housing SPD. The Strategic Housing Market Assessment (SHMA) informing the affordable housing is five years old and needs updating and recommend that the SHMA is updated before a further round of consultation is undertaken on the SPD.</p>	<p>Comments noted, but the purpose of this draft Developer Contributions SPD is to set out St Helens Borough Council's approach to seeking developer contributions. It provides guidance in relation to the interpretation and implementation of the policies in the Local Plan, in particular Policy LPA07: Infrastructure Delivery and Funding. It does not set out new policy as explained in the introduction to the SPD.</p> <p>Comment noted, and the Council recognises that developer contributions are negotiable, and it is noted that monetary contributions may be either increased, decreased, or removed following discussions between the Planning Authority and the applicant. Chapter 3 recognises that there will be negotiation over the level of contributions sought, which will include consideration of viability. Accordingly, it is not considered that further clarification is required in the draft SPD.</p> <p><u>Affordable Housing</u> The Council are aware of outdated SPDs, which will be adopted in the future, but production of a new SHMA is not currently proposed as the calculation is still considered to be fit for purpose. The calculation may be updated once a new SHMA has been produced should that provide different evidence.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p><u>Biodiversity</u> Redrow understand and support the need for ecological mitigations and enhancements to be provided on site and welcome the flexibility the SPD provides in terms of providing off-site, as sometimes on-site can impact on viability.</p> <p><u>Education</u> Object to the minimum level of surplus school places as a minimum of 7% of total capacity. The Securing Developer Contributions for Education DfE guidance states that the department’s Basic Need funding calculation include a 2% operating margin at planning area level to help support parental choice, pupil population, and the general manageability of the system. Developers should not be expected to provide additional contributions to maintain a surplus of school spaces across the Borough. If school spaces are available, they should be accounted for in calculating contributions and therefore the minimum 7% surplus requirement should be removed from the SPD.</p> <p>Paragraph 2.52 sets out the approach taken to seeking contributions towards home to school transport. It suggests that a contribution will be sought for any development which is beyond a reasonable walking distance of schools. However, no such contribution would be necessary were pupils do not attend their nearest suitable school as those pupils would not be eligible for free</p>	<p><u>Biodiversity</u> Comments noted, and no changes required.</p> <p><u>Education</u> Comment noted, but no change required. Healthy surplus school places in the Borough are considered to be between 2% and 7%. 7% is the minimum surplus capacity in an area to allow for fluctuations in demand, parental choice and in-year transfers, and is not counted as available when calculating developer contributions; this is considered good practice and is in-line with other LAs, DfE and National Audit Office perspectives. The National Audit Office report on Capital Funding for new school places states in regard to surplus places: “[the DfE] <i>considered that on average 5% was the bare minimum needed for authorities to meet their statutory duty with operational flexibility, while enabling parents to have some choice of schools</i>”.</p> <p>Comment noted, but no change required. Paragraph 2.52 clearly states that any contribution will be in line with the Council’s Home to School Travel Assistance Policy (which has now been updated and therefore amended in the SPD). This document states that ‘<i>Assistance with transport will usually be provided to those pupils who are attending the nearest qualifying school (my emphasis) with available places, where the safest measured walking distance between home and school is two miles or more, for children up to the age of eight, and three miles or</i></p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>home to school transport. Accordingly, the text should be revised to reflect this.</p> <p>Paragraph 2.53 relates to temporary school solutions to meet a need where it may not be possible to open permanent new school at the point of need. Redrow recognise the need to provide temporary school solutions in certain circumstances, but developers should not be expected to fund both temporary and permanent school places. This constitutes double funding of school places and represents a significant extra cost to developers. This is recognised within paragraph 41 of the DfE guidance entitled Securing Developer Contributions for Education. As such, the SPD is not appropriate and does not accord with DfE guidance. Therefore, object and suggest this requirement is deleted.</p> <p>Paragraph 2.54 notes that whilst the Council use the DfE's pupil yield, they reserve the right to use different pupil yields should a more bespoke robust local evidence base come forward in the future. The NPPF and NPPG identify that the approach to calculating infrastructure needs is to be established in the development plan. It would be inappropriate to</p>	<p><i>more, for children over the age of eight and up to the age of eleven.'</i></p> <p>DfE guidance set out in the 'Securing Developer Contributions for Education' document, states (at paragraph 45) that should development be approved where there is no suitable solution for sustainable access to school, developer contributions towards the cost of home-to-school transport for an agreed period, such as three years (which reflects the usual timescale for government revenue funding) may be sought.</p> <p>Comments noted, and paragraph 2.53 will be amended to reflect current DoE guidance as: <i>Education contribution funding will secure the capital costs of accommodating school pupils. This could fund the capital build, access and associated site curtilage costs for an expansion or new build. In line with DfE guidance, developer contributions could also be used to provide temporary solutions to meet education needs where it may not be possible to open a permanent new school at the point of need. <u>When a permanent new school is delivered (or the relevant financial contribution is received), no further contributions to temporary provision should be required. However, the permanent provision of additional school places will still have to be funded to mitigate the impact of a development.</u></i></p> <p>Comments noted, but no changes required. PPG: Planning Obligations states in paragraph 007, that plan makers and local authorities for education should agree the most appropriate developer funding mechanisms for education, assessing the extent to which developments should be required to mitigate their direct impacts. The way in which calculating the education contribution will still be the same, however, should a more</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>review this through an SPD such as this. In respect of educational infrastructure, this is similarly confirmed in paragraph 41 of the DfE Securing Developer Contributions for Education guidance. Should the Council seek to use different data, then this needs to be tested through a Local Plan or Local Plan review not introduced by this SPD.</p> <p><u>Flood Risk, Water Management & Sustainable Drainage</u> Paragraph 2.64 - Acknowledge that whilst s106 contributions or commuted sums may be required when management is undertaken by the Local Authority, the SPD should include flexibility to allow management companies to take on the responsibility of the management and maintenance of such infrastructure where appropriate, as this is common on large residential development sites.</p> <p><u>Healthcare Provision</u> The SPD requires a direct link to increased demand on local health services to be demonstrated to secure developer contributions towards new or enhanced health and social care facilities. It should be highlighted that not every new dwelling will result in a new resident for the Borough, or a new patient for the relevant NHS Trust, as many new homes developed will be occupied by existing local residents in the area, including from concealed households. Such households will not generate additional impacts on the health service because they will be utilising that service already. Indeed, the Borough's increase in population will not</p>	<p>bespoke evidenced based document come forward to provide the Council will a better understanding of potential pupil yields then the Council reserve the right to use this as it is crucial data that feeds into that calculation.</p> <p>DfE guidance also encourages setting these calculations out in other planning policy documents, such as SPDs.</p> <p><u>Flood Risk, Water Management & Sustainable Drainage</u> Commented noted, and the paragraph has been amended accordingly to provide more flexibility and clarity, as set out below: <i>' However, the on-going future management and maintenance of such infrastructure may need to be secured through a s106 Agreement or potentially commuted sums, unless a management company has been appointed by the developer.'</i></p> <p><u>Healthcare Provision</u> Comments noted, and the Integrated Care Board (ICB) will be the key consultee to inform decision makers of required mitigation for any development's impact on the local primary healthcare system. The form and amount of mitigation through additional practice floorspace will depend on a range of factors to be determined at the point of application such as the capacity in existing practices. Guidance will be sought from the ICB on the amount of additional practice capacity required as a result of the development's expected population growth, the best option to provide this and where (e.g. extension, branch surgery, new practice etc), and the expected costs per square metre to deliver the necessary floorspace. It is considered that this information</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>automatically track housing development. On that basis, when considering any increased demand and any costs associated to it, this should be factored into account.</p> <p>It is not for new development to rectify existing shortfalls in health care supply. The SPD should clearly state that where a contribution is required a proportionate developer contribution will be sought that distinguishes between the needs generated by the existing population within the area and new population that will be generated by the development.</p> <p><u>Public Open Space and Outdoor Sports Provision</u> In relation to outdoor sports facilities, new development should not be expected to rectify existing shortfalls in sports provision. Paragraph 2.92 should be clearer and state that where a contribution is required a proportionate developer contribution will be sought based on the new population that will be generated by the development and not the shortfall which already exists.</p> <p><u>Public Realm</u> Redrow would like it noted within the SPD that the delivery of new homes will generate additional</p>	<p>can be most up to date if provided to the applicant at the point of pre-application engagement.</p> <p><u>Public Open Space and Outdoor Sports Provision</u> Comment noted. New provision through development may address shortfalls to some extent but only in so far as they provide for the residents of those developments.</p> <p>Paragraph 2.92 will be amended accordingly to read: <i>'Likewise, where identified shortfalls in outdoor sports and recreation provision (golf courses and recreational water bodies) would be exacerbated by the additional demand generated by housing development, a proportionate developer contributions will be sought towards the enhancement of these existing facilities or provision of new facilities in the area to address their new demand (and not to address any existing shortfall) shortfall, as informed by the Playing Pitch Strategy and Action Plan (or any future update thereof).'</i></p> <p><u>Public Realm</u> Comments noted, but no changes required. The SPD recognises that not all developments will require an</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>local retail expenditure for public spaces (such as retail expenditure in town/local centres) and therefore, such development would positively impact on the vitality and viability of the public realm. As such, mitigation should not be sought from residential-led development where positive impacts of this nature would occur.</p> <p><u>Social and Community Facilities and Provision</u> Support the protection and appropriate new provision of social and community facilities. Developer contributions should be proportionate based on the new population that will be generated by the development that distinguishes between the wider need for such a provision.</p>	<p>improvement to the public realm to make them acceptable in planning terms, and therefore a public realm contribution will not be sought in all instances. The design and quality of the public realm is central to creating successful places. Larger substantial development would benefit from wider public realm improvements that residents of new developments would enjoy and find appealing.</p> <p><u>Social and Community Facilities and Provision</u> Comment noted, and no required change.</p>
Rainhill Civic Society	Not happy with the timing of the consultation	Comment noted, but no changes required.
Sport England	<p>Support the positive approach to meeting demand generated from developments for sport and recreation provision taking account of the findings of the relevant evidence based produced to inform the adopted Local Plan in line with NPPF paragraph 102.</p> <p>Notes that the SPD has been informed by its Playing Pitch Strategy (PPS) 2016. We are unaware if the PPS has been kept up to date to establish if the findings are still relevant. Our records show that the PPS was updated in 2021 but no evidence of this is found on the Council website or reference made to it in the SPD. It is advised that the authority commission consultants to undertake a new PPS</p>	<p>Comment noted, and no changes required.</p> <p>Comments noted, and no changes required. An updated PPS has been commissioned, however, this document has yet to be formally adopted. The draft SPD specifically states the following in paragraph 2.92 (now 9.42) and, therefore, all provision will be informed by the latest adopted evidence: '<i>as informed by the Playing Pitch Strategy and Action Plan <u>(or any future update thereof)</u></i>.' (my emphasis)</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	which should inform the SPD and St Helens Borough Local Plan.	
The Coal Authority	No specific comments to make on any of these draft SPDs.	Comment noted, and no changes required.
United Utilities	Supportive of the Flood Risk, Water Management and Sustainable Drainage section of this SPD. Request that the ongoing management and maintenance of watercourses is covered by a formal planning agreement. This is preferable to a reliance on riparian ownership maintenance, which is often ineffective.	Comments noted, but the purpose of this draft SPD is to set out the circumstances when a development may be required to provide a developer contribution. It is considered that the suggested additions fall outside the remit of this draft SPD.
WSP on behalf of Barratt / David Wilson Homes	<p>There are likely to be numerous instances where viability assessments may well be required to support planning applications where expectations on affordable housing delivery and other sought developer contributions (over and above typical contributions) are insisted upon and it should not be assumed that the viability of all sites within the St Helen's Local Plan has already been scrutinised in full, particularly given the additional burden placed on developers through more recent national planning and building regulations.</p> <p>The NPPF and NPPG set out various guidance in relation to viability and plan making. Policy requirements should be informed by evidence of infrastructure need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of a s106. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land. The SPD policy objectives could have an adverse impact on</p>	<p>The Council's approach to viability is intended to provide both guidance of approach and flexibility to facilitate acceptable development. It is noted that monetary contributions may be either increased, decreased or removed following discussions between the Planning Authority and the applicant. Chapter 3 recognises that there will be negotiation over the level of contributions sought, which will include consideration of viability. It is not considered that further clarification is required in the draft SPD.</p> <p>It is not for the Council to account for land costs. Land prices should be policy compliant.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>the viability of schemes and consequently the delivery of much needed housing, investment, new facilities and infrastructure.</p> <p>Since the adoption of the Local Plan building costs have risen and additional requirements have been placed on housebuilders that have increased costs, which amounts to an additional £22,000 per new home.</p> <p>Note in paragraph 3.26 that payments will be indexed linked, in light of recent economic events this could have serious implications on viability, specifically on previously approved sites.</p> <p>Require further clarification on monitoring fees, as they could be interrupted as a lack of trust in the process. Evidence will need to be provided as to what these costs will be and who will be monitoring them, and the costs should be part of this documents.</p> <p><u>Affordable Housing</u> There is a need to update the Affordable Housing SPD to include findings from the SHMA.</p> <p>Paragraph 2.11 should be amended to clarify clear clawbacks as part of any obligations to be 5 years from the date of payment, given that the contributions apply directly to any development and</p>	<p>Comment noted.</p> <p>Comment noted, and see above reference in terms of viability.</p> <p>Comments noted, but no changes required. Paragraph 4.2 clearly sets out the circumstances for monitoring fees, and the monitoring of developer contributions will be undertaken by the Council's Section 106 Officer (Development Control, Enforcement team), to ensure that financial contributions and non-financial obligations are delivered on-time.</p> <p><u>Affordable Housing</u> Comments noted. The Local Plan recognises that a number of existing SPDs need to be updated and, therefore, it is the intention of the Council to update the Affordable Housing SPD accordingly.</p> <p>Comments noted, but changes are not considered necessary. Given the potentially complex nature of developer contributions and timeframes/triggers of instalments it is considered that there should not be set clawback provisions contained in the SPD. As previously stated, these are negotiated as a part of the planning</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>it should be clear that these should be utilised expeditiously. Double counting should be avoided.</p> <p>The Council should include reference within the SPD that schemes for 100% affordable housing would also be considered as being exempt from being required to make developer contributions. Request that the SPD includes a specific reference at the appropriate section of the document that the Council will review planning applications for 100% affordable housing carefully at development management stage, noting that it will be unlikely that developer contributions will be secured on such schemes without adversely affecting the viability of the development.</p> <p>Registered Providers need to be part of the conversation, given they have direct and more up-to-date experience of dealing with the customers of affordable housing, and understand the local demand and its fluctuations, along with the logistical and practical implications of affordable housing.</p> <p>Wish to ensure that any additional commitments to affordable housing within a forthcoming SPD do not impact a site which is currently submitted for planning permission and based on the existing adopted Local Plan.</p>	<p>process, and it is considered necessary for these to remain as negotiable positions. As a rule, clawbacks tend to be over 5-, 7- or 10-year periods.</p> <p>Comments noted. Applications for 100% affordable housing will not be considered any differently to applications for 0% affordable housing provision. The contributions set out in the draft SPD will be sought from the point of adoption. Additional developer contributions will not be sought on current planning applications that have already been advised of what their developer contributions are likely to be.</p> <p>The Council recognises that developer contributions are negotiable, and it is noted that monetary contributions may be either increased, decreased or removed following discussions between the Planning Authority and the applicant. Chapter 3 recognises that there will be negotiation over the level of contributions sought, which will include consideration of viability. No changes required.</p> <p>Comment noted, and registered providers have been consulted on the contents of this draft SPD.</p> <p>The contributions set out in the draft SPD will be sought from the point of adoption. Additional developer contributions will not be sought on current planning applications that have already been advised of what their developer contributions are likely to be.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p><u>Transport and Travel</u> Accept development generating significant amounts of transport movement must be supported by a Transport Assessment or Transport Statement, specific comments have been made in regard to the Transport and Travel SPD.</p> <p><u>Biodiversity</u> The financial impacts of BNG should be considered as part of a Local Plan Review. Achieving such biodiversity enhancement and continued maintenance is however not quantified in financial terms within the policy.</p> <p>Paragraph 2.2.7 should be amended to ensure that it is clear that any off-site contributions towards habitat creation and management should be used within the local borough area in order to benefit the local community. BNG tariffs will increase the cost of plots, which is a significant additional cost to developers. No figures for the cost of biodiversity units are provided within the draft SPD for St Helens, creating uncertainty over the level of contributions required by developers.</p> <p>Each site and development proposal will need to be assessed on a case by case basis, and where it is evident that the requirements of BNG have a large cost implication, this should be accounted for when considering the overall viability of a development and requests for other s106 contributions or other developer obligations.</p>	<p><u>Transport and Travel</u> Comments noted, and no changes required</p> <p><u>Biodiversity</u> Comments noted, and additional text has been added to the draft SPD at paragraphs 2.22, 2.26 and 2.27, to include reference to obligations in context of the Biodiversity Gain Regulations 2024.</p> <p>Adherence to these and its guidance provides significant information for developers to address the issue of both off and onsite issues. Further guidance (to be prepared) from the Council and Liverpool City Region will provide additional information on addressing local off-site provision. The consideration of financial impacts is something the developer will have to consider as the requirements for Biodiversity Gain are statutory and not linked to viability assessment.</p> <p>Each site will have different constraints or opportunities even though site area or number of dwellings may be the same. It is essential that each case is determined on its merit. The Council is confident that there is sufficient flexibility within Chapter 3 and policies within the Local Plan to react to market changes.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p><u>Education</u> Welcome the clarification in paragraph 2.44 which states that an education contribution will only be sought where there is a projected shortfall of primary and secondary places at schools and not to address any existing shortfall.</p> <p>Accept that SEN needs are reviewed on a regular basis and may change.</p> <p>The SPD should specifically highlight what the costs will be for each type of placement, but this has yet to be provided. We note that existing education contributions are based on calculations on old census data.</p> <p>The draft SPD does not provide the contributions for all educational needs, there is currently no way for developers to assess the total educational need contributions and how this compares to what was considered at the time of preparing the Local Plan. The SPD should be reconsulted upon once these requirements are known so they can be reviewed and commented upon.</p>	<p><u>Education</u> Comment noted, and no changes required.</p> <p>Comment noted, and no changes required.</p> <p>Comment noted, the costs are taken from the latest published DfE base rate cost for a place in early years, primary, secondary, post-16 & SEN, which are updated on a regular basis by the DfE (as stated in paragraph 2.15 of the draft SPD). The calculations are based on the Department for Education (DfE) Pupil Yield Data Dashboard⁴, which was developed with Ordnance Survey (OS) data, and the Valuation Office Agency (VOA) via the Office for National Statistics (ONS). This recommended methodology for estimating pupil yield from housing developments was developed to assist local authorities in demonstrating the need for education facilities during local plan preparation and when considering planning applications.</p> <p>The Council undertakes an annual assessment of school capacity as part of its Pupil Place Planning process. Whilst this will provide useful information to indicate when a contribution is likely to be required, it is still essential that developers engage in the pre-application process in order for the Council to undertake a detailed assessment of whether there is a need to provide additional school places to meet the needs arising from the development. None of the responses to consultation, or the subsequent amendments proposed, necessitate a further round of consultation.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Would welcome clarity on how education contributions are pooled if a number of developments are submitted in the same area.</p> <p>Where approved housing makes no s106 contribution this could lead to capacity in one location being exhausted and mean the next application is required to make a significant contribution. This is not equitable or fair and could lead to certain sites and development proposals being rendered unviable when seeking to achieve a range of other policy requirements.</p> <p>The SPD should encourage Neighbourhood Plans and Infrastructure Development Plans to identify local education establishments, where locally collected s106 payments (i.e. those provided to town and parish councils) could be spent.</p> <p>Wish to ensure that any additional commitments to education within a forthcoming SPD do not impact a site which is currently submitted for planning permission and based on the existing adopted Local Plan.</p>	<p>Developer contributions from multiple developments may be pooled towards works required to extend a school, provided they would be directly related to the development, necessary to make the development acceptable in planning terms, and fairly and reasonably related in scale and kind to the development. However, each application will be assessed on a case by case basis with input from Education Service colleagues.</p> <p>The Council has a statutory duty to provide school places and is positively planning for additional school places as part of its Pupil Place Planning work. Case Officers will work closely with appropriate stakeholders (in this instance the Council's Education Department), who are best placed to advise accordingly where any payments collected should be spent. As stated in the draft SPD (paragraph 2.43), forecasting a school's capacity to accommodate children from housing development is often complicated by the fact that a development will not start generating pupils for many years, long after the forecasting of local school capacity, which is based on a five-year pupil projection plan for primary education and a seven-year pupil projection plan for secondary education. Therefore, due to the time it takes to produce a Neighbourhood Plan any need may have already been overcome, or no-longer required. However, any future Infrastructure Delivery Plan will identify any need. Pre-application advice from the Council is strongly encouraged (paragraph 3.9) in order for the Council to undertake a detailed assessment of whether there is a need to provide additional school places to meet the needs arising from the development and to determine the content of any s106 agreement.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p><u>Healthcare Provision</u> SPD references policy LPA07 and LPA12 in the Local Plan which requires as part of all major proposals to review the possible health impact of a policy or proposal. No worked example is provided as part of the consultation draft and therefore we are unable to comment in full towards the appropriateness of the considerations that will be taken into account.</p> <p>At paragraph 2.67, should be amended to confirm that mitigation measures sought will be of a scale to ensure the development does not result in undue impacts and will be of a scale proportionate to the development. Indeed, it is not the developer's responsibility to address existing needs of the community. Identified health project(s) where the contributions are to be spent need to be justified and</p>	<p>Chapter 3 recognises that there will be negotiation over the level of contributions sought, which will include consideration of viability.</p> <p><u>Healthcare Provision</u> Comments noted. Paragraph 2.75 sets out how the enhancement of existing health provision will be sought. The Integrated Care Board (ICB) will be the key consultee to inform decision makers of required mitigation for any development's impact on the local primary healthcare system. The form and amount of mitigation through additional practice floorspace will depend on a range of factors to be determined at the point of application such as the capacity in existing practices. Guidance will be sought from the ICB on the amount of additional practice capacity required as a result of the development's expected population growth, the best option to provide this and where (e.g. extension, branch surgery, new practice etc), and the expected costs per square metre to deliver the necessary floorspace.</p> <p>It is considered that this information can be most up to date if provided to the applicant at the point of pre-application engagement.</p> <p>Comment noted, however, paragraph 2.73 specifically states that '<i>Where a direct link to increased demand on local health services can be demonstrated due to the proposed developmentcontributionswill be required to meet the needs of the new community.</i>'</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>assessed appropriately to ensure the funds are utilised correctly.</p> <p>It is imperative that sites are assessed on a case-by-case basis in terms of contributions sought.</p> <p>Welcome further information within the draft SPD that sets out a financial cost of new residents on local health services in St Helens and how much this would equate per resident along with occupancy ratios per dwelling size.</p> <p>With respect to the current planning application for a residential scheme on allocated land known as Florida Farm South, Haydock, we would wish to ensure that any additional commitments to healthcare contributions within a forthcoming SPD do not impact a site which is currently submitted for planning permission and based on the existing adopted Local Plan.</p> <p><u>Public Realm</u> Would like it noted within the SPD that the delivery of new homes will generate additional local retail expenditure for town centres and therefore such development would positively impact on the vitality and viability of these centres. As such, mitigation should not be sought from residential-led development where positive impacts of this nature would occur. Public realm and art can be at the</p>	<p>Comment noted, and each site will have different constraints or opportunities even though site area or number of dwellings may be the same. It is essential that each case is determined on its merit.</p> <p>The purpose of the draft SPD is not to identify the content or value of potential obligations, which in any event vary depending on the application proposed, its location and vary over time. All contributions sought will be subject to the CIL Tests. The methodology for deriving the health contribution is based on the latest guidance produced by NHS Properties.</p> <p>The contributions set out in the draft SPD will be sought from the point of adoption. Additional developer contributions will not be sought on current planning applications that have already been advised of what their developer contributions are likely to be.</p> <p><u>Public Realm</u> Comment noted, and no changes required. The draft SPD provides flexibility in the Council's approach to securing planning obligations to account for site specific and novel circumstances. The design and quality of the public realm is central to creating successful places. Larger substantial development would benefit from wider public realm improvements that residents of new developments would enjoy and find appealing.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>developers cost through the design and achieved through conditions rather than through a s106 agreement.</p> <p><u>Open Space</u> Wish to ensure that any additional commitments to public open space, outdoor sports provision and public realm within a forthcoming SPD do not impact on a site which is currently submitted for planning permission and based on the existing adopted Local Plan.</p>	<p><u>Open Space</u> Comment noted, and no changes required. The draft SPD does not consider specific sites but provides general guidance for use by people applying for planning permission to ensure they address open space provision. The contributions set out in the draft SPD will be sought from the point of adoption. Additional developer contributions will not be sought on current planning applications that have already been advised of what their developer contributions are likely to be.</p>

St Helens Borough Council Open Space Provision and Enhancement SPD – Consultation Responses

The draft Open Space Provision and Enhancement SPD sets out St Helens Borough Council’s approach to seeking high quality open spaces for new developments and / or to enhance existing open spaces throughout the Borough.

The SPD provides further guidance for applicants including landowners and developers as well other stakeholders in relation to Local Plan Policies LPC05: Open Spaces and LPD03: Open Space and Residential Development

It works towards achieving the Council’s corporate priorities of supporting a strong, thriving, inclusive and well-connected local economy and by creating green and vibrant places that reflect our heritage and culture.

It is set around five stages:

- **Stage 1: Policy application**
- **Stage 2: Type of provision**
- **Stage 3: Amount**
- **Stage 4: Location**
- **Stage 5: Financial contribution**

The following table summarises the responses received in relation to the draft Open Space Provision and Enhancement SPD, and includes the Council’s response to each of the comments. Appendix C includes a Table of Changes proposed for the draft Open Space Provision and Enhancement SPD.

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
Active Travel England	The statutory consultee role of Active Travel England (ATE) does not extend to local planning or planning policy, therefore ATE will not respond on this occasion.	Comments noted, and no changes required.
Asteer Planning on behalf of Wain Estates (Land) Limited	The Open Space SPD should make the relationship between relevant Local Plan Policies (e.g. LPA11, LPC05, LPD01, LPD02, LPD03) and the various	Comments noted, and no changes required. When producing SPDs, careful attention is paid to ensure a consistent approach is undertaken. SPDs should not introduce new policy, therefore

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>SPDs very clear, to avoid any confusion and/or delays as a result of multiple policy documents being used to calculate open space requirements, and/or to justify contributions from applications within the BFGV. Failing to do so may result in additional requirements being imposed on applications within BFGV to the point that development (and the delivery of the wider BFGV and its infrastructure) is rendered unviable and/or undeliverable.</p> <p>The draft SPD should either provide specific guidance in relation to the BFGV allocation; or preferably, clarify that the specific open space requirements for the BFGV will be dealt with through the separate, more detailed BFGV Masterplan SPD. The BFGV Masterplan SPD will need to cover all 5 stages set out in the Open Space SPD in detail.</p> <p>If Wain (or other developers/landowners) cannot provide sufficient open space on their parcel within the BFGV; but the necessary open space is provided elsewhere within the BFGV – the SPDs should confirm that this would not be considered ‘off-site’ provision and would not attract a 10% admin charge.</p> <p>Estimated occupancy is based on ‘maximum occupancy’ for each size of dwelling. This approach is at odds with the typical approach taken by most LPAs (where an average occupancy figure is used) and will lead to over-provision of open space in most cases - which will impact on scheme viability and deliverability; and, reduce the ability to provide other contributions required.</p>	<p>any SPD should align with the policies of the adopted St Helens Borough Local Plan up to 2037. This is explained in the introductory section of the SPD.</p> <p>Comments noted, but no changes required. This draft SPD does not consider specific sites. Rather it provides general guidance for use by people applying for planning permission to ensure they address open space provision. Therefore, the issue of open space provision will be addressed in the Bold Forest Garden Village Masterplan SPD, which will align with development plan policies and any other material considerations.</p> <p>Comments noted, however, to use a flat rate average occupancy rate does not differentiate between sizes of dwellings and is particularly unrealistic when calculating future population, especially of new developments.</p> <p>Therefore, the Council will apply a more realistic assumed occupancy rate, based on the first bedroom (master bedroom)</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE												
	<p>It is therefore considered that the Council should apply average household size instead of maximum occupancy rates for the calculation of open space, to improve certainty for developers, ensure new developments remain viable and to avoid unnecessary delays in the determination of planning applications.</p>	<p>being shared by two persons and then only one person in each of the additional bedrooms, as follows:</p> <table border="1" data-bbox="1281 371 2116 619"> <thead> <tr> <th>Number of bedrooms per dwelling</th> <th>Assumed Maximum Occupancy rate per person</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2</td> </tr> <tr> <td>2</td> <td>3</td> </tr> <tr> <td>3</td> <td>4</td> </tr> <tr> <td>4</td> <td>5</td> </tr> <tr> <td>5+</td> <td>6</td> </tr> </tbody> </table> <p>This approach aligns with a number of neighbouring authorities' method of calculating open space provision.</p>	Number of bedrooms per dwelling	Assumed Maximum Occupancy rate per person	1	2	2	3	3	4	4	5	5+	6
Number of bedrooms per dwelling	Assumed Maximum Occupancy rate per person													
1	2													
2	3													
3	4													
4	5													
5+	6													
Canal and River Trust	No Comment to make	Comment noted, and no changes required												
Frost Planning on behalf of English Land	<p>The SPD's duplicate much of existing national and local policy. They are too detailed, confusing, unwieldy to understand, and impractical to use. They should be shorter and simpler toolkits for all to use.</p> <p>All SPDs fail to recognise that many employment sites are difficult to deliver on viability grounds. The SPDs impose layers of additional financial and other obligations (e.g. design, BNG, open space, travel plans), therefore any SPDs should exclude key employment sites and sites that benefit from extant planning permissions.</p>	<p>Comments noted, and no changes required as any new proposals for development on a site allocated within the Local Plan or with extant planning consent will still need to adhere to all relevant development plan policies, including specific requirements as set out in Appendix 5 of the St Helens Borough Local Plan.</p> <p>The draft SPDs do not introduce new policy, but rather provide additional guidance and clarity of existing policies contained in the development plan as explained in their introductions.</p>												
Historic England	Encourage the consideration of the historic environment in the production of your SPDs. Advice that we seek advice from the local authority	Comments noted, and no changes required.												

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	conservation officer and from the appropriate archaeological staff, who best placed to provide information on the historic environment.	
Lead Local Flood Authority, Lancashire County Council	As the proposals lie outside of the Lancashire County boundary – no comments to make.	Comment noted, and no changes required.
Lead Local Flood Authority, St Helens Borough Council	<p>The LLFA support how this document will use SuDS in support of the multi-function benefits and connectivity. Also support that water storage features should not be included in the amenity greenspace use and calculations identified in Appendix 7.</p> <p>The LLFA welcome the acknowledgement and breakdown of flood risk and the management of Surface water identified in this document.</p>	Support noted, and no changes required.
Lichfields on behalf of Taylor Wimpey and Story Homes	<p>Support the use of pre-application engagement to determine the open space requirements as early as possible, on a case-by-case basis, that clearly indicates which open space typologies would be required to be delivered onsite and contributions to typologies off-site, subject to viability.</p> <p>It is anticipated that the level of Open Space Provision across the 4HA allocation area would be set out within the emerging Bold Forest Garden Village Masterplan SPD, in accordance with the content of this draft SPD. It is, therefore, very important that all emerging SPDs are consistent in their approach to open space provision and all other requirements/contributions.</p> <p>The SPD should clarify how equalisation of open space provision will be secured across the whole</p>	<p>Comments noted, and support welcomed.</p> <p>Comments noted, and a consistent approach will be undertaken where appropriate.</p> <p>This draft SPD does not consider specific sites but provides general guidance for use by people applying for planning</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE												
	<p>site. The SPD should also confirm which allocated sites the SPD would apply to, and how the SPD would sit alongside other site-specific SPD's particularly the Bold Forest Garden Village Masterplan SPD.</p> <p>Disagree with the Council's use of maximum occupancy rates to calculate the Open Space requirement, as this generates a significantly inflated Open Space requirements for new housing developments which is not considered reasonable or viable. The approach will lead to unrealistic requirements for Open Space which will significantly reduce the developable area for sites that will inevitably result in arbitrarily negotiations between the Council and applicants regarding the quantum of Open Space and will result in an Open Space requirement far in excess of what would be considered acceptable or appropriate on any new development site. We do not consider that historic use of the maximum occupancy rates is adequate justification for the continued use, it is a flawed approach which has no policy basis. Considers that the use of average household size is a far more appropriate mechanism to calculate the requirement, as opposed to maximum occupancy rates. Neighbouring authorities use different approaches.</p> <p>In order that the SPD remains up to date the evidence needs to be updated. It is unclear why the Open Space, Sport and Recreation Background Paper (February 2021) that was prepared to inform</p>	<p>permission to ensure they address open space provision. Therefore, the issue of equalisation will be addressed in the Bold Forest Garden Village Masterplan SPD, which will be specific to that site.</p> <p>Comments noted, however, to use a flat rate average occupancy rate does not differentiate between sizes of dwellings and is particularly unrealistic when calculating future population, especially of new developments. Therefore, the Council will apply a more realistic assumed occupancy rate, based on the first bedroom (master bedroom) being shared by two persons and then only one person in each of the additional bedrooms, as follows:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Number of bedrooms per dwelling</th> <th>Assumed Maximum Occupancy rate per person</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td style="text-align: center;">2</td> </tr> <tr> <td style="text-align: center;">2</td> <td style="text-align: center;">3</td> </tr> <tr> <td style="text-align: center;">3</td> <td style="text-align: center;">4</td> </tr> <tr> <td style="text-align: center;">4</td> <td style="text-align: center;">5</td> </tr> <tr> <td style="text-align: center;">5+</td> <td style="text-align: center;">6</td> </tr> </tbody> </table> <p>This approach aligns with a number of neighbouring authorities' method of calculating open space provision.</p> <p>Comment noted, and no change required. The adopted Local Plan (July 2022) Policy LPD03 is based on the evidence set out in the St Helens Open Space Assessment 2016.</p>	Number of bedrooms per dwelling	Assumed Maximum Occupancy rate per person	1	2	2	3	3	4	4	5	5+	6
Number of bedrooms per dwelling	Assumed Maximum Occupancy rate per person													
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ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>the Local Plan, has not been referenced in the draft SPD.</p>	<p>Updated studies and strategies will be used to support and inform new open space provision when available. This is recognised in paragraph 2.20 of the draft SPD. In addition, paragraph 2.21 refers to updates to this assessment which are currently being prepared.</p> <p>The background paper was prepared to provide evidence for the Local Plan examination and was a brief summary of the St Helens Open Space Assessment 2016.</p>
Mersey Forest	<p>Natural England’s Green Infrastructure Standards for England sets out the maximum distance greenspaces should be from dwellings. The standards say “<i>A doorstep greenspace of at least 0.5ha within 200 metres, or a local natural greenspace of at least 2ha within 300 metres walk from home. A medium sized neighbourhood natural greenspace (10ha) within 1km.</i>”</p> <p>The Mersey Forest Plan can be used as a tool for developers and the Local Authority to identify the best areas for greenspaces.</p>	<p>Comments noted, and it is acknowledged that the Mersey Forest can be used as a tool for developers and the Local Authority to identify the best areas for greenspaces. However, in terms of maximum distances for greenspaces from dwellings, Local Plan Policy LPD03, Table 8.1 sets out accessibility and quantity standards for the Borough. As the draft SPD is merely an amplification of existing policy and therefore a change to the text is not considered appropriate.</p>
National Highways	<p>National Highways is not greatly impacted by the policies within it. However, are supportive of plans that seek to improve active travel measures and remove vehicles from the highway network for short journeys. In particular, Section 3.3 under Key Principles discusses enhancing connectivity to wider networks, including cycling and walking that can assist in that aim. Supportive of plans that look to develop a greater sense of “place”, by providing local facilities and reducing the need for people to travel.</p>	<p>Support noted, and no changes required.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
<p>Nexus Planning on behalf of BXB (Cowley Hill) Ltd.</p>	<p>Page 13 refers to larger, multi-phase developments and the relevant bullet point states: <i>‘Comprehensive provision and cumulative impact..... specific new development.’</i></p> <p>This is not particularly clear, if it is suggesting that the open space provision on a particular part of a phased site should reflect the overall requirement for the site, then this is appropriate. However, open space requirements on a particular phase of a multi-phase site should also reflect the overall masterplanning approach to the site and the distribution and hierarchy of open space established in a parameter plan or illustrative masterplan.</p> <p>This, as in the case of Cowley Hill, may focus accessible open space in a particular phase or phases, taking account of accessibility within the site and to existing open spaces in the wider community. In such cases it is not appropriate, nor consistent with the overall masterplanning approach to require each phase to deliver a ‘policy compliant’ amount of open space consistent with the number of dwellings / residents in that particular phase, which would be contrary to the overall masterplanning approach. The paragraph should be amended as follows:</p> <p><i>‘Comprehensive provision and cumulative impact – developments that come forward as part of a larger multi-phase site should have regard to the total open space expected for the comprehensive development of the wider site and be designed accordingly. The cumulative effect of a number of phases may create</i></p>	<p>Comments noted, and no changes required. It is considered that the wording of this particular bullet point on page 13, is clear in its meaning in that open space provision on larger sites that will be multi-phased should have regard to the total open space expected for the overall site. Furthermore, paragraph 5.2 references larger sites where a masterplan is to be prepared in accordance with Local Plan Policy LPA04: Strategic Housing Sites, to ensure a holistic approach to open space provision is taken.</p> <p>This draft SPD does not consider specific sites but provides general guidance for use by people applying for planning permission to ensure they address open space provision.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p><i>the need for open space provision to serve the whole community of that specific new development. <u>The open space required for each phase of a larger multi-phase site should reflect the total space requirements and the agreed distribution of open space between each phase to meet that requirement as part of an overall masterplanning approach.</u></i></p>	
<p>Open Spaces Team, St Helens Borough Council</p>	<p>Page 12 - additional key principle – Meeting local needs can include improving existing open spaces rather than developing new sites for example improving habitats, updating sports & play equipment and improving the infrastructure of existing parks and open spaces to make them more accessible.</p> <p>Page 15 - would like additional wording added to ensure equipment complies with relevant regulations.</p> <p>Should recommendations from ROSPA be included within the document.</p> <p>Page 17, Table 2 - the occupation rates for new development seems higher than other standards used by Councils, from 2 bedrooms upwards we have an extra person per room.</p>	<p>Comments noted, and this section has been amended as follows to improve clarity:</p> <p><i>‘This can also include improvements to existing open spaces, for example improving habitats, updating sports & play equipment and improving the infrastructure of existing parks and open spaces to make them more accessible.’</i></p> <p>Comments noted, and additional text has been added to ensure play equipment is built to relevant standards, as follows:</p> <p><i>‘and comply with the relevant regulations current at the time of installation, including a full Installation Certificate on completion.’</i></p> <p>Recommendations from ROSPA would be more suitable as part of an overall response from the Open Spaces Team on a specific planning application (s), as it will be different on a case-by-case basis.</p> <p>Comments noted, and the Council will apply a more realistic assumed occupancy rate, based on the first bedroom (master bedroom) being shared by two persons and then only one person in each of the additional bedrooms, as follows:</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE												
	<p>Page 21, Table 4 - guidance for type of equipped play. The standard provision for NEAP and MUGA contributions is lower than the recommendation by Fields in Trust guidance for outdoor sports and play.</p> <p>Page 25, Table 7 - the threshold for on-site provision for Natural & Semi natural greenspace should be from 200+ not 500+ Dwellings. Is there a reason for this?</p>	<table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <tr> <td style="width: 50%;">Number of bedrooms per dwelling</td> <td style="width: 50%;">Assumed Maximum Occupancy rate per person</td> </tr> <tr> <td>1</td> <td>2</td> </tr> <tr> <td>2</td> <td>3</td> </tr> <tr> <td>3</td> <td>4</td> </tr> <tr> <td>4</td> <td>5</td> </tr> <tr> <td>5+</td> <td>6</td> </tr> </table> <p>This approach aligns with a number of neighbouring authorities' method of calculating open space provision.</p> <p>Comment noted, and no changes required. The draft SPD uses Fields in Trust advice as a guidance only. It is considered that the approach taken gives more flexibility for both developer and the Council.</p> <p>The numbers referred to are Fields in Trust guidance. Based on the quality and quantum as set out in Table 8.1, reducing the numbers could lead to sites being incapable of providing the required quantum along with sufficient land for the proposed housing development, and should a smaller site have to provide a sum in-lieu, this could potentially lead to viability issues.</p>	Number of bedrooms per dwelling	Assumed Maximum Occupancy rate per person	1	2	2	3	3	4	4	5	5+	6
Number of bedrooms per dwelling	Assumed Maximum Occupancy rate per person													
1	2													
2	3													
3	4													
4	5													
5+	6													
Pegasus Group on behalf of Redrow Homes Ltd.	The SPD is currently informed by the Open Space Assessment Report June 2016. Whilst it is understood that an updated report is currently in the process of being prepared, this has not yet been published or made publicly available. The current report is therefore over 7 years old – and the circumstances in respect of open space and other recreational facilities will no doubt have changed over this time. We would therefore recommend that the updated evidence base and Open Space report	<p>The adopted Local Plan (July 2022) Policy LPD03 is based on the evidence set out in the St Helens Open Space Assessment 2016.</p> <p>Up-dated studies and strategies will be used to support and inform new open space provision when available. This is recognised in paragraph 2.20 of the draft SPD. In addition, paragraph 2.21 refers to updates to this assessment which are currently being prepared. None of the responses to consultation,</p>												

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>is published before a further round of consultation is undertaken on the Open Space SPD.</p> <p>The acknowledgement of the importance of viability considerations is therefore welcomed, as this is key to ensuring development can be delivered in a prompt manner.</p> <p>Supportive of the acknowledgement in the SPD that, 1 bedroom properties will not generate need for children’s play equipment, an approach commonly accepted when calculating POS requirements.</p> <p>Concerned raised regarding the standards contained in Table 3, in terms of how accurate they are and whether they represent a solid basis from which to calculate POS requirements.</p> <p>Support the acknowledgement that there will be circumstances where off-site provision is more suitable than on-site. POS provision is often delivered via a mixture of on and off-site provision – to ensure efficient and effective use of development sites and the delivery of appropriate and optimal residential densities. It is often the case that off-site financial contributions towards POS such as allotments represents a more appropriate option as they can enhance existing facilities and provision in</p>	<p>or the subsequent amendments proposed, are considered to necessitate a further round of consultation.</p> <p>Support welcomed, and no changes required.</p> <p>Support welcomed, and no changes required.</p> <p>The draft SPD is merely an amplification of existing policy (LPD03, Table 8.1) which was based on sound evidence, including the St Helens Indoor and Built Sports Facilities Needs Assessment (2016), the St Helens Open Space, Sport, and Recreation Assessment (2016) (OSSRA) and the St Helens Playing Pitch Strategy Assessment (2016) all currently provide the most up to date evidence and identify that there are a number of deficiencies in the Borough. No changes required.</p> <p>Support welcomed, and no changes required.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>the local area which serve the local community.</p> <p>Support that POS can be multi-purpose, integrated and overlapping with Biodiversity Net Gain (BNG) mitigation features.</p> <p>Would welcome further clarity on the Council's approach to allowing overlap between typologies and consider there should be an allowance for sustainable drainage areas and BNG area to fall within POS typologies and not be seen to be in addition to. There should be scope to overlap some POS requirements across the typologies rather than these being rigidly adhered to. It should be made clear that where development proposals provide more than the required open space provision set out in the SPD in one or more areas, this could be used to off-set the need to provide alternative forms of open space in order to recognise developments that deliver significant green infrastructure over and above these requirements.</p> <p>It is notable that these costs for LAPS, LEAPS and NEAPS are all higher than those contained in the Local Plan Viability Assessment (December 2018) In light of these rising costs (and known viability issues in certain areas of the Borough), this further supports the flexible approach outlined at paragraph 5.3 of the SPD in respect of viability considerations.</p> <p>Paragraph 8.9 of the SPD suggests a minimum 10-year period to retain/spend off-site financial contributions from receipt. Do not support this</p>	<p>Support welcomed, and no changes required.</p> <p>The draft SPD encourages applicants to maximise opportunities (as part of the open space requirement) for multi-functional benefits including resilience to climate change by reducing the effects of flooding, contributing to sustainable drainage, woodland tree planting and creating and enhancing wildlife habitats to help achieve a measurable biodiversity net gain.</p> <p>Each application is considered on a case-by-case basis taking into account the needs and scale of the development, the requirement for different types of open space, existing deficiencies in the area, site circumstances and the suitability of providing on-site or off-site provision.</p> <p>Comments noted, and no changes required.</p> <p>Comments noted, and no changes required. There are many instances where development can take a number of years to progress. A minimum 10-year period allows that flexibility and</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>suggestion, as it is an elongated timescale which provides little clarity or transparency to the local community or developer in terms of when and where the money is being spent. It is critical that new infrastructure is delivered in a timely manner. The danger of not doing so simply builds mistrust and a lack of faith between local communities, the local authority and the development industry.</p> <p>The SPD should include monitoring mechanisms to ensure the prompt identification of POS sites and spending of financial contributions. Redrow also recommend that a shorter timeframe of 5 years for payback be proposed. Finally, for the reasons outlined above in respect of clarity and the delivery of infrastructure in a timely manner, Redrow also object to the suggestion that the 10-year period may need to be extended as determined by the Local Planning Authority. It is recommended that this be removed from the SPD.</p> <p>Support the requirements and design guidance as it highlights how POS can be multi-functional and overlap with areas such as BNG and SuDS in certain circumstances. It is important that drainage areas and BNG are not excluded from POS calculations as useable areas, as these areas can be multi-functional and ensure effective and suitable development densities are delivered on site.</p>	<p>insurance to the local community that there are the funds in place to provide the necessary open space provision.</p> <p>The draft SPD recognises at paragraph 8.8 that financial contributions will be spent within the vicinity of development site to improve the most appropriate nearby site(s). These are usually specified in the Section 106 agreement and are within the walking distances of the development site or within the ward boundary to meet the needs of local residents.</p> <p>Each development site will have different constraints or opportunities and requirements, even though site area or number of dwellings may be the same. It is essential that each case is determined on its merit. Monitoring of developer contributions will be undertaken by the Council's Section 106 Officer (Development Control Enforcement Team), to ensure that financial contributions and non-financial obligations are delivered on-time.</p> <p>Support noted. The draft SPD is merely an amplification of existing Local Plan Policy LPD03. It is accepted that in certain instances BNG and SuDS can be used towards open space calculations, however, reasoned justification is clear that any open space areas provided on site should be accessible, safe, overlooked and strategically located within the site. The calculation of the amount of open space needed should not include areas such as landscaping, verges, or inaccessible areas such as permanent water storage facilities.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Drainage mitigation areas should not be automatically excluded from POS calculations because this very much varies on a site-by-site basis. The need for a flexible approach to multi-purpose POS areas is particularly important given the increasing pressures on undeveloped land on sites in addition to public open space, including the emerging requirement for 10% Biodiversity Net Gain (BNG) via the Environment Act 2021 which is due to apply to planning applications from February 2024, increasingly prescriptive requirements from LLFAs in respect of SuDS and other matters.</p> <p>Consider that reference to water storage facilities to not be included as amenity greenspace should be removed – as this blanket approach does not take account of site-specific circumstances where this can be acceptable. Instead, it is suggested this is re-worded to state the following: <i>“water storage facilities and drainage solutions on site (such as SuDS basins) are to be considered on a case by case basis in terms of assessing inclusion within the calculated requirement”.</i></p> <p>Supporting text acknowledges how some sites can bridge the definition of typologies and suggests that POS can be overlapping. On this matter, we would highlight that the natural and semi-natural greenspaces typology (which includes sites that provide and support wildlife conservation and biodiversity) should allow for BNG mitigation areas to be included within any calculations – as clearly there is an overlap.</p>	<p>Comments noted, and no changes required. The draft SPD encourages applicants to maximise opportunities (as part of the open space requirement) for multi-functional benefits including resilience to climate change by reducing the effects of flooding, contributing to sustainable drainage, woodland tree planting and creating and enhancing wildlife habitats to help achieve a measurable biodiversity net gain.</p> <p>Comment noted, and text will be amended to echo Local Plan Policy LPD03 reasoned justification, and the word ‘permanent’ will be added: ‘....<i>such as <u>permanent</u> water storage</i></p> <p>Comment noted, and no changes required.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
Rainhill Civic Society	Not happy with the timing of the consultation	Comment noted, and no changes required
The Coal Authority	No specific comments to make on any of these draft SPDs.	Comment noted, and no changes required.
Turley on behalf of Harworth Estates Investments Ltd.	<p>Harworth notes that these updated results / documents have not been made publicly available. Clearly, without the necessary evidence base, the approach to the provision of open space in the draft SPD cannot be demonstrated to be justified. The lack of clarity and unavailability of the evidence base also prevents understanding of the approach.</p> <p>These occupancy rates are quoted as being the “maximum” rates for new development at numerous points throughout the draft SPD, however, there is a lack of clarity on whether or how this would be applied flexibly on a site-by-site basis. Therefore, SHBC should supply the evidence base, including any recent surveys undertaken in relation to occupancy rates in the Borough and those of new residential developments, to allow the occupancy rates to be fully investigated.</p> <p>The 2021 Census data provides a more appropriate mechanism for identifying anticipated occupancy rates in calculating the amount of open space required for new residential development. The maximum occupancy rates proposed within the draft SPD generate significant space quantum requirements, which would fundamentally constrain the delivery of new dwellings (and other infrastructure requirements) within the site. This is</p>	<p>Comments noted, and the draft SPD is merely an amplification of existing policy which was based on sound evidence, including the St Helens Indoor and Built Sports Facilities Needs Assessment (2016), the St Helens Open Space, Sport, and Recreation Assessment (2016) (OSSRA) and the St Helens Playing Pitch Strategy Assessment (2016) all currently provide the most up to date evidence and identify that there are a number of deficiencies in the Borough. Updated studies and strategies will be used to support and inform new open space provision when available. This is recognised in paragraph 2.20 of the draft SPD. In addition, paragraph 2.21 refers to updates to this assessment which are currently being prepared.</p> <p>Comments noted, however, to use a flat rate average occupancy rate does not differentiate between sizes of dwellings and is particularly unrealistic when calculating future population, especially of new developments. Therefore, the Council will apply a more realistic assumed occupancy rate, based on the first bedroom (master bedroom) being shared by two persons and then only one person in each of the additional bedrooms, as follows:</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE													
	<p>considered to undermine the overall delivery of residential development, by restricting the volume of dwellings which could be developed on-site whilst providing policy-compliant open space.</p> <p>Where open space cannot be delivered on-site, the draft SPD confirms that off-site financial contributions would be sought (for developments of 40 or more dwellings). The proposed occupancy levels will have the same effect as on-site provision, by inflating the financial contribution to be paid. Again burdening unnecessary financial constraints on new residential development and would fundamentally impact on overall viability.</p>	<table border="1" data-bbox="1279 272 2116 517"> <thead> <tr> <th data-bbox="1279 272 1697 339">Number of bedrooms per dwelling</th> <th data-bbox="1697 272 2116 339">Assumed Maximum Occupancy rate per person</th> </tr> </thead> <tbody> <tr> <td data-bbox="1279 339 1697 376">1</td> <td data-bbox="1697 339 2116 376">2</td> </tr> <tr> <td data-bbox="1279 376 1697 413">2</td> <td data-bbox="1697 376 2116 413">3</td> </tr> <tr> <td data-bbox="1279 413 1697 450">3</td> <td data-bbox="1697 413 2116 450">4</td> </tr> <tr> <td data-bbox="1279 450 1697 486">4</td> <td data-bbox="1697 450 2116 486">5</td> </tr> <tr> <td data-bbox="1279 486 1697 517">5+</td> <td data-bbox="1697 486 2116 517">6</td> </tr> </tbody> </table> <p>This approach aligns with a number of neighbouring authorities method of calculating open space provision.</p>		Number of bedrooms per dwelling	Assumed Maximum Occupancy rate per person	1	2	2	3	3	4	4	5	5+	6
Number of bedrooms per dwelling	Assumed Maximum Occupancy rate per person														
1	2														
2	3														
3	4														
4	5														
5+	6														
Torus Developments	<p>Is there a date for the release of the updated strategy documents? Important to understand the conclusions in relation to open space provision across the Borough.</p> <p>It is very difficult for developers to obtain a 25 year warranty for all play equipment on new build sites. Most only provide a max of 5 year warranty against play equipment. Appreciate that the play equipment has to be robust, but many developers would struggle to obtain a 25-year warranty. Could this be worded differently to ensure ongoing maintenance of play equipment by the developer?</p>	<p>There is no date as yet for the publication of the 2021 OSSRA assessments, which are currently going through the Council's procedural process. The draft SPD is merely an amplification of existing Local Plan policy (LPD03, Table 8.1) which was based on sound evidence, including the St Helens Indoor and Built Sports Facilities Needs Assessment (2016), the St Helens Open Space, Sport, and Recreation Assessment (2016) (OSSRA) and the St Helens Playing Pitch Strategy Assessment (2016) all currently provide the most up to date evidence and identify that there are a number of deficiencies in the Borough.</p> <p>The use of metal framed play equipment will be encouraged, as this apparatus has a longer lifespan than wooden structures and comes with a 25-year warranty. However, each application is considered on a case-by-case basis considering the needs and scale of the development, the requirement for different types of open space, existing deficiencies in the area, site circumstances and the suitability of providing on-site or off-site provision, in</p>													

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Would welcome a discussion about the differences between a 40 and 51 unit development scheme which requires a LAP or a LEAP. There are significant cost increases for a LEAP, which for a 51 unit scheme would adversely impact on its overall financial viability. Torus are happy to provide and maintain play equipment, but a LEAP at 51 units would have a significant cost impact.</p> <p>Torus endeavour not to build and re-house families in apartment blocks. In the report it states that developments for apartments for one bedroom may not be suitable for children and not trigger play area contributions - this might need to cover 2-bedroom apartments as well.</p> <p>Why is there a need to retain contributions for minimum 10 years. It is understood that current BNG contributions are for 5 years only at present. This might be appropriate for larger scale developments where completion could take a significant chunk of this 10 years, however for a 2 year/30 unit build to PC - is a 10-year period justified and appropriate?</p>	<p>consultation with the Council's Open Space and Development Control teams.</p> <p>Acknowledged, however, thresholds need to be set and they are considered appropriate having regard to the potential number of occupants that these size of schemes could create. The Fields in Trust benchmark guidelines were considered too high, as they consider any development from 1 to 200 should provide a LAP and LEAP. As stated above, each application will be considered on a case by case basis.</p> <p>Comments noted, but no changes required. Paragraph 8.5 acknowledges there are some types of residential uses less likely to be occupied by families with young children and, therefore, will not trigger contributions for children and young people open space provision. Based on evidence contained in the 2019 Strategic Housing Market Assessment (SHMA), it is expected that the focus of new market family housing provision will be on 2 and 3-bed properties, which is expected from newly forming households. Two bed properties tend to be more affordable for young families just starting out on the property ladder.</p> <p>Comments noted, and no changes required. There are many instances where development can take a number of years to progress. A minimum 10-year period allows that flexibility and insurance to the local community that there are the funds in place to provide the necessary open space provision.</p>
United Utilities	Supportive of the reference to open space being multifunctional including climate change resilience,	Support welcomed, and no changes required.

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>flood control and water management. Wish to emphasise that the location of open space should be intrinsically linked to a wider strategy for surface water management and landscaping, which should be considered at the outset of the design process.</p>	
<p>WSP on behalf of Barratt / David Wilson Homes</p>	<p>The SPD identifies off-site open space contribution figures to give the industry certainty on likely costs to be required to meet open space when not available on a development site. The costings are not underpinned by an appropriate evidence base.</p> <p>A greater degree of confidence needs to be given to the figures provided in this table, potentially by presenting maximum figures for all typologies. This will allow developers to have a clear picture of the viability implications of these figures for potential development sites before entering the planning process.</p> <p>The definition of 'green space' used throughout the document should be defined, and clarification should be provided as to whether this refers to specifically designated sites in policy terms.</p> <p>The document should be amended to include clarity on how areas reserved for BNG within a development are viewed in terms of open space provision. The definition of open space is too rigid and should allow for flexibility for example</p>	<p>The costs have been provided by the Council's Open Space Team and are based on known costings of various typologies.</p> <p>New open space provision should be provided in accordance with the standards set out in Local Plan Policy LPD03 and is not determined by a single calculation. The open space requirements are based on a bespoke assessment for each individual application, carefully considering the needs and scale of the development, the requirement for different types of open space, existing deficiencies in the area, site circumstances and the suitability of providing on-site or off-site provision. This assessment can be provided together with detailed calculations at pre-application and application stage.</p> <p>Comments noted, and no changes required. The term 'green space' referred to in the document is a general term given to all open space typologies. Furthermore, definitions of specific open space typologies are set out in Appendix 7.</p> <p>The SPD encourages applicants to maximise opportunities (as part of the open space requirement) for multi-functional benefits including resilience to climate change by reducing the effects of flooding, contributing to sustainable drainage, woodland tree planting and creating and enhancing wildlife habitats to help achieve a measurable biodiversity net gain. It also sets out</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>planted/seeded areas for Biodiversity Net Gain should still be counted as open space.</p> <p>SuDS features should also not be ruled out as part of the open space calculate; it is up to the applicant to demonstrate how these features might contribute.</p> <p>Clarification is sought whether landscaped areas count towards open space provision. Landscaped areas should be considered on a case-by-case basis. Non-incidenta landscaped areas can have a very positive impact on the overall design of a development and should be included.</p> <p>Welcome the need to provide LAPs and LEAPS however the guidance should be clear on expectation from larger sites and that if there are existing within the area these should be assessed on a case-by-case basis.</p> <p>The evidence is out of date, the Council should not be making contribution requests on an out-of-date evidence base.</p> <p>In terms of viability, we welcome the ability to negotiate open space contributions as set out in</p>	<p>broad design principles for new open space and expectations for management and maintenance. BNG will be considered on a case-by-case basis and, therefore, it is not necessary to be covered in this SPD.</p> <p>Comment noted, and text will be amended to echo Local Plan Policy LPD03 reasoned justification, and the word 'permanent' will be added. '....such as <u>permanent</u> water storage</p> <p>No clarification required. The SPD is merely an amplification of existing Local Plan Policy LPD03. It is accepted that in certain instances BNG and SuDS can be used towards open space calculations, however, reasoned justification is clear that any open space areas provided on site should be accessible, safe, overlooked and strategically located within the site, and that this should not include areas such as landscaping, verges, or inaccessible areas such as permanent water storage facilities. Paragraph 5.15 also acknowledges that in some circumstances improvements to existing off site open spaces may be more suitable.</p> <p>The adopted Local Plan (July 2022) Policy LPD03 is based on the evidence set out in the St Helens Open Space Assessment 2016. Updated studies and strategies will be used to support and inform new open space provision when available. This is recognised in paragraph 2.20 of the SPD. In addition, paragraph 2.21 refers to updates to this assessment which are currently being prepared.</p> <p>Comments noted, and no changes required. New housing developments are required to provide and/or contribute to new</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>paragraph 5.3 however, would request that wording is amending to remove 'exceptional cases' given that viability issues are present in many sites across St Helens. The document should provide any opportunity for developers to submit a viability assessment in order to reduce the quantity of public open space. This should be provided to ensure that any new SPD does not overburden developments, particularly those in low value market areas.</p> <p>To make it clearer, it would be beneficial if s106 requirements for off-site costs could be tied to the improvement or creation of identified open space provisions in the local area of the site in question.</p> <p>The SPD needs to clarify whether on-site provision delivered on-site and via off-site contributions get added to the GIS mapping and other relevant data, to help the Council update its own evidence base.</p> <p>Off-site contributions need to be specific in improving or creating open space in the local vicinity of new development.</p> <p>Paragraph 8.3 requires further clarification would maintenance equate to the whole open space or just those elements a contribution has been received.</p>	<p>or improved open space, sport and recreation facilities unless the developer clearly demonstrates that it is not financially viable for the development proposal. This is set out in Local Plan policy LPD03 and has been found 'sound' through the Local Plan Examination in Public.</p> <p>The draft SPD recognises at paragraph 8.8 that financial contributions will be spent within the vicinity of development site to improve the most appropriate nearby site(s). These are usually specified in the s106 agreement and are within the walking distances of the development site or within the ward boundary to meet the needs of local residents.</p> <p>Comments noted, and no changes required. GIS mapping will be updated as part of the Council's evidence base, and therefore it is not considered relevant to amend the draft SPD to reference this aspect.</p> <p>Comments noted, and no changes required. Key Principles (Location), clearly states that were off-site provision is acceptable, it should be in the local area accessible from the new development.</p> <p>Paragraph 8.3 clearly relates to off-site financial contribution in lieu of on-site provision. However, as part of any planning application details of maintenance would need to be approved for a 25-year period whether on-site or off-site.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Paragraph 8.4, further clarification is required as whether the Council will require full details of maintenance arrangements before a planning application is determined or as part of a condition.</p> <p>Open spaces should be maintained and adopted by the LPA however, it is usual to have a management company secured via negotiation as part of the s106.</p> <p>Welcome clarification at paragraph 7.7 in regard to timescales and triggers for laying out and completing the open space provision.</p> <p>Developments of a significant scale such as Florida Farm will be subject to co-ordinated phased release, the SPD needs to introduce a degree of flexibility.</p>	<p>Details of long-term management and maintenance will need to be provided by the developers at either application stage or as a condition of approval, as clarified in paragraph's 8.4 and 9.1.</p> <p>The draft SPD refers to different ways open space can be managed and maintained. It is normal practice for open space management companies to be set up to maintain open spaces within new developments. The draft SPD does not preclude the Council from adopting open space sites in future.</p> <p>Support welcomed, and no changes required.</p> <p>Comments noted, and no changes required. This draft SPD does not consider specific sites but provides general guidance for use by people applying for planning permission to ensure they address open space provision.</p>

St Helens Borough Council Transport and Travel SPD – Consultation Responses

The draft Transport and Travel SPD builds upon policies set out in the Local Plan and provides consistent guidance to applicants on access and transport requirements for new developments and re-developments.

It sets out the Council’s approach and expectations for new developments and re-developments in relation to walking, cycling, wheeling, public transport, ultra-low or zero emission vehicles, parking standards, freight management, air quality, noise, and travel plans. On adoption, it will supersede the ‘Ensuring a Choice of Travel’ (2010) SPD as well as ‘Guidance Note for Travel Plans’ (2016) and ‘Guidance Notes for the Submission of Transport Assessments’ (2016).

The following table summarises the responses received in relation to the draft Transport and Travel SPD, and includes the Council’s response to each of the comments. Appendix D includes a Table of Changes proposed for the draft Transport and Travel SPD.

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
Active Travel England	The statutory consultee role of Active Travel England (ATE) does not extend to local planning or planning policy, therefore ATE will not respond on this occasion.	Comments noted, and no changes required.
Asteer Planning on behalf of Wain Estates (Land) Limited	<p>Development Size</p> <p>The SPD sets out that developments will either be categorised as major or minor. However, with respect to residential developments, Table 2 defines a major development as ‘10 dwellings or more or sites over 0.5 hectares’, which follows the thresholds for determining planning applications. Wain consider this to be a very low level of threshold and is at odds with advice in other sections of the SPD, e.g. when a Travel Plan is required. The current SPD (Ensuring a Choice of Travel) defines a major housing development as having 50 dwellings or more, which seems a reasonable threshold. The major threshold is also well below that used by Active Travel England (‘ATE’) who become involved in schemes which are 150 dwellings or more or have a site area of 5</p>	<p>Comment noted and no changes required. The draft Transport and Travel SPD will replace the Ensuring a Choice of Travel SPD which is now 14yrs old and outdated. The development definitions (major and minor) as used in this SPD are standard and follow recommended guidance (CheckDevelopmentClass_PlanningPortal). Council disagrees that the major and minor thresholds are not at odds with ‘when a Travel Plan is required.’ The need for a Travel Plan can have its own bespoke threshold (please see Figure 12 within the draft SPD) and does not need to correlate with the definitions for major and minor developments. Travel Planning is not specific to a size of development, but relates to whether the LPA judge that a development would “generate significant amounts of movement on a case by case basis (i.e. significance may be a lower threshold where road capacity is already stretched or a</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>hectares or above. These inconsistencies must be addressed and corrected so that the SPD refers major development in travel plan terms as being 150 dwellings or more.</p> <p>Minimum Accessibility Standard Assessment (MASA) Para 7.1 states that all applicants should submit a Minimum Accessibility Standard Assessment ('MASA'). This suggests that a MASA would also be required for minor schemes, which is considered excessive and onerous and could prevent sites coming forward. The SPD does not clarify how the requirement for a MASA will apply to sites within a strategic allocation such as BFGV. Issues such as sustainability and accessibility have/will be addressed in detail by the allocation through the Local Plan process and/or the production of a comprehensive Masterplan SPD as is the case for the BFGV. Where the policy position is already clear for key allocations i.e. through the Local Plan or an SPD/Masterplan the Transport and Travel SPD should not impose any further requirements in this regard. Part of the MASA for walking (para 7.17) and cycling (para 7.19) includes the internal layout. This may mean that applicants have to prepare fairly detailed development layout plans to show how</p>	<p><i>higher threshold for a development which proposes no car parking in an area of high public transport accessibility)".</i> (paragraph 9 - Travel Plans, Transport Assessments and Statements - GOV.UK (www.gov.uk) With regards to Active Travel England's threshold, as a small national organisation, this has been self-determined and set at a much greater size to allow ATE to be more effective in terms of utilising their resource and capacity in the best manner to respond to significant sized schemes. It is unlikely that ATE in its current form would wish to be consulted on every standard 'major' scheme application (as defined in CheckDevelopmentClass_PlanningPortal) across the country.</p> <p>Comment noted. The MASA is an important tool that is aligned with Local Plan and Local Transport policy. It is a checklist to ensure that the location, design and impact of proposals are fully considered. If a proposal has a low score when assessed though a MASA then it would not meet policy. With regards to sites of the magnitude of BFGV, these would be considered in the context of a wider masterplan study, as noted within the Local Plan. With regards to MASA application, there may be a requirement to address a MASA on a plot by plot basis. As stated within the draft SPD, applicants are advised to engage with Transport Development Control if there is any uncertainty. With regards to outline applications, these still must address requirements of LPA06 for example and thus applications must set out how a development meets requirements and adheres to principles as set out. The assessment of site accessibility at a Local Plan stage is envisaged to be sufficient to justify removal from the Greenbelt and/or to potentially identify measures in the Infrastructure Delivery Plan required to bring the site forward. At Planning Application stage, the following quote from the St</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>walking and cycling infrastructure fits into the scheme. The MASA also includes parking. This again mean that a detailed housing layout needs to be prepared to demonstrate parking levels, even if the application is for outline consent only. Para 7.25 sets out the accessibility criteria for public transport. The third bullet is 'contribution to service enhancement'. This seems to suggest that there will be an expectation of some form of upgrade, e.g. bus stop, service frequency, etc, whether justified or not.</p> <p>Further clarity is required as to the definition of 'large number of movements' in the MASA summary table on page 51.</p> <p>Point (e) of the summary table suggests that there will be no negotiated agreement with the Council where there could be valid points to discuss. This is also at odds with para 57 of NPPF which states that planning obligations should meet all of the following: <i>"a) necessary to make the development acceptable in planning terms;</i> <i>b) directly related to the development; and</i></p>	<p>Helens Local Plan Sustainable Transport Impact Assessment should be noted.</p> <p><i>"It is anticipated that the Site Accessibility Criteria form a key part of any further assessment of the site and achieving 'Excellent' ratings should not be a substitute for more detailed assessment where appropriate. It is envisaged that, where possible, development sites will take the necessary practicable steps to achieve the highest possible Accessibility Matrix rating in each category".</i></p> <p>This clarifies that it is necessary to revisit the assessment at Planning stage and consider the assessment in more specific detail relevant to the proposals being brought forward. In terms of 'contribution to service enhancement', paras 7.27 to 7.29 provides further guidance as to what could be considered. Where an applicant believes they have no obligation to provide a contribution to service enhancement then this must be explained fully in their MASA submission. The Council may seek further clarification on the submitted MASA but this will be entirely at its discretion. It is noted that the scoring mechanism for Accessibility for Bus within the MASA could be amended to help clarify the process. Therefore, the scoring for Location and Access to Public Transport, and, Frequency of Public Transport, will be amended so that it is scored separately to the scoring of Contribution to Service Enhancement.</p> <p>Comment noted and no changes required. The Travel Plans, Transport Assessments and Statements - GOV.UK (www.gov.uk) guidance does not define what a large number of movements is, and specifically makes it the responsibility of the LPA to determine this on a case by case basis. The National Planning Policy Framework sets out that all developments which generate 'significant' amounts of transport movement should be required to provide a TP, TA or TS. Local planning authorities</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p><i>c) fairly and reasonably related in scale and kind to the development.”</i></p> <p>Transport Statement vs Transport Assessment Paragraph 8.5 does not offer any guidance as to when a TA or TS is appropriate. This is offered in the currently adopted SPD and is useful to help applicants when developing and preparing their applications. It would be helpful if this information could be provided in this updated SPD.</p>	<p>must make a judgement as to whether a proposed development would generate significant amounts of movement on a case-by-case basis.</p> <p>Comment noted and no changes required. Regarding the suggestion ‘there will be no negotiated agreement’. As above, applicants will set out any justification within their MASA submission. If there is a failure to robustly justify why suggestions are not achievable then the Council is within its right to secure improvements that are needed. However, following the MASA process any decisions taken will be in line with monetary contributions guidance in terms of what is applicable.</p> <p>Comment noted and no changes required. As stated in various parts of the draft SPD, if there is any uncertainty, please do contact the Transport Development Control team. In terms of guidance, please see figure 7, as well as the Transport Statement, Transport Assessments and Travel Plan chapter. Please see para 8.16 in particular. No particular thresholds have been set as this is line with central Governments policy move in favour of local determination. The National Planning Policy Framework sets out that “all developments that generate significant amounts of transport movement should be supported by a Transport Statement or Transport Assessment. Local planning authorities must make a judgement as to whether a development proposal would generate significant amounts of movement on a case by case basis”. (Paragraph 13 - Travel Plans, Transport Assessments and Statements - GOV.UK (www.gov.uk)). Therefore, the decision and scoping for an application will be determined by Highways Development Control.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Transport Impact of Development – Trip Generation Paragraph 8.6.5 seems to suggest that the permitted use of the site/buildings would be ignored if it/they have been vacant for 5 years or more. The ‘fallback’ approach is important to applicants as it enables schemes to be developed efficiently and not over engineered.</p> <p>Travel Plans The definitions of schemes in Figure 12 is contradictory with other sections of the SPD and a consistent approach should be applied throughout.</p> <p>Parking Under paragraph 9.57 It is not clear why the SPD draws a distinction between integral and detached garage space. This could lead to designers selecting particular house types to meet parking standards,</p>	<p>Comment noted. It is not intended for para 8.6.5 to suggest that permitted use of site/buildings will be ignored nor that fallback is not a valid consideration. However, a timeframe for the appropriate consideration of permitted uses is required given that for a fallback position to be valid there has to be an obvious possibility it can be delivered. Five years is an often-used metric within Transport Planning to consider the validity of traffic data and its sufficiency/validity for application. It has therefore been applied in this instance to consider traffic flow changes. It should be noted however that the subsequent part of the paragraph provides caveat to this, noting, "<i>or a long enough period for traffic growth/reduction (of all modes) on the adjacent highway network to equal potential trip generations</i>". This ensures that determination of the validity of fallback can be discussed and is considered compliant with the ruling in 2017 Court of Appeal Judgement (Mansell v. Tonbridge & Malling Borough Council [2017] EWCA Civ 1314). In order to reflect the judgement above, the Council will change the term ‘<i>reasonable prospect</i>’ in the following sentence to ‘possibility’, <i>“A fall-back position can only be considered if there is a reasonable prospect possibility of it being implemented if the current application is refused.”</i></p> <p>Comment noted and no changes required. The need for a travel plan has its own bespoke threshold (please see Figure 12 within the draft SPD) and does not need to correlate with the definitions for major and minor developments. Please also see the earlier response to ‘Development Size’.</p> <p>Comment noted and no changes required. In terms of house type design, ultimately choice will be led by the market and land availability and not by parking standard alone. With regards to why integral or attached domestic garages not being counted as</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>which could impact the delivery of good design. The parking standard in the current SPD (Ensuring a Choice of Travel) is 2 spaces per dwelling irrespective of bedroom numbers and location. The proposed parking standards are a significant reduction. By way of an example, if a scheme comprised:</p> <ul style="list-style-type: none"> • (i) Two-bedroom dwellings: 50 • (ii) Three or more-bedroom dwellings: 50 <p>Total 100</p> <p>Under current guidance, a maximum of 200 spaces could be provided. Under the proposed guidance, a maximum of 138 spaces could be provided – a reduction of 62 spaces. This may result in a significant increase in on-road parking, which could have implications for servicing (e.g. refuse), deliveries and emergency vehicles.</p>	<p>a car parking space(s). The CIHT technical note on residential parking notes the following: "garages are often used for storage rather than parking, especially when the internal dimensions do not relate to the size of modern cars. Where garages are to be provided, additional curtilage and/or on-street parking is likely to be required. Open car ports and car barns are more likely to be used for parking" (chapter 4 res_parking_design:Layout 1 (ciht.org.uk). "The key issue when determining the size and nature of parking spaces is will they be used, or abused? A single garage needs to be big enough for additional storage, and even then it may not be used for parking. A double garage may only be used for a single vehicle". (chapter 4 res_parking_design:Layout 1 (ciht.org.uk). A key question posed by CIHT is "If garages are included, are they likely to be used to an extent that will contribute to the overall accommodation of expected levels of ownership?". This consideration drives the requirement that attached garages are not likely to count toward a defined parking space. With regards to parking reductions, the Ensuring a Choice of Travel SPD is 14yrs old and considerably outdated. Section 2 of the Transport and Travel SPD Our Preferred Future clearly sets out a new approach to the assessment of planning applications in the context of decide and provide and the boroughs commitment to net zero. We all have a role to play in minimising our impact on climate change and achieving our agreed net zero goal. This explains the reduction in parking provision and promotion of sustainable and accessible modes of travel. The calculation included in the rebuttal is not valid. The standards in the new SPD still require 2 spaces per dwelling (albeit with reductions possible based on accessibility levels), the distinction is simply that an attached garage will not count toward one of those spaces.</p>
Canal and River Trust	No specific comments made.	Comments noted, and no changes required.

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
<p>Frost Planning on behalf of English Land</p>	<p>The SPD's duplicate much of existing national and local policy. They are too detailed, confusing, unwieldy to understand, and impractical to use. They should be shorter and simpler toolkits for all to use.</p> <p>All SPDs fail to recognise that many employment sites are difficult to deliver on viability grounds. The SPDs impose layers of additional financial and other obligations (e.g. design, BNG, open space, travel plans), therefore any SPDs should exclude key employment sites and sites that benefit from extant planning permissions.</p> <p>Para 1.3 - Other than proportionate EV parking, we consider the SPD should not seek to control the use of ultra-low or zero emission vehicles, or freight management. See also comments under Chapter 10 below. This remit is too restrictive and onerous.</p>	<p>Comment noted but no change required. The SPDs do not introduce new policy, but rather provide additional guidance and clarity of existing policies contained in the development plan. as explained in their introductions. This also includes signposting to relevant national and regional policy for further context and guidance.</p> <p>Comments noted, new proposals for development on a site allocated within the Local Plan or with extant planning consent will still need to adhere to all relevant policies, including specific requirements as set out in Appendix 5 of the Local Plan, however for the avoidance of doubt in terms of viability the following paragraph on viability has been added to the draft SPD introduction: <i>'It is the responsibility of the applicant to take into account any costs including their own profit expectations and risks and ensure that proposals for development are policy compliant. Where the principles set out in the SPD impact upon the viability and deliverability of a development, the applicant can argue a case for non-compliance, by preparing a viability appraisal to be shared with the Council. This does not, however, exempt the developer from adopting the process set out in this SPD'</i></p> <p>Comments noted, and no changes required. In the context of a local Net Zero commitment and Government commitment to ban the sale of new petrol and diesel vehicles from 2035, the draft SPD has an obligation to ensure that the requirements and infrastructure needs (whether passive or active) is fully considered, including signposting to relevant regulations that should be followed. With regards to Freight Management, NPPF paragraph 113 requires that <i>"Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local</i></p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Paras 1.4, 1.5 and 3.1 - Should acknowledge that this SPD will be applied flexibly where these requirements may threaten viability. It should also say clearly that the SPD will not be applied at all when a site benefits an extant planning permission (e.g. Site 9EA) and a new scheme is the same or similar.</p> <p>Para 6.27 (Guidance) – The criteria primarily apply to residential development. If imposed on employment sites, such as Site 9EA, the criteria would be problematic and threaten delivery. The guidance should state the criteria only applies to residential development and rely on the adopted Local Plan policies (including Policy LPA06) to control non-residential development.</p> <p>Chapters 7, 8, 9 – All chapters should acknowledge that the accessibility, travel plan, and parking</p>	<p><i>shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use".</i> The Freight Management Chapter of the SPD is designed to be reflective of this requirement, with the use of HGV Management Plans aligned to support this.</p> <p>Comments noted, and no changes required. At the point of adoption, the Transport and Travel SPD supersedes the Ensuring a Choice of Travel SPD and must be followed. The draft SPD has been developed to ensure any developments that are brought forward are in line with current policy. Any assessments undertaken via the draft SPD will still be subject to viability tests. Furthermore, the existence of an extant scheme or a fallback position does not negate the need to consider assessments of any updated proposals to determine if prior conclusions remain valid. The extent of any new assessment requirements will be determined through the scoping process, where prior conclusions and agreements will be taken into account.</p> <p>Comments on para 6.27 (Inclusivity in Design) are noted. No changes are required. The Council strongly recommends that the needs of those with disabilities are fully considered and therefore relevant guidance such as DfT's Inclusive mobility: making transport accessible for passengers and pedestrians have been referenced and should be reviewed to help inform design decisions. Employment development is specifically referenced within the inclusive mobility document.</p> <p>Comments noted, and no changes required. The draft SPD provides further detailed guidance to Policy LA06. Once</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>requirements should be applied flexibly to reflect market realities and viability considerations on a site-by site basis. For example, where a site benefits an extant permission and a new scheme is the same or similar, such as Site 9EA, these requirements should not apply at all. The specific requirements (e.g. funding new bus services, extensive travel plan measures, and limited staff parking) should also be relaxed because they could otherwise undermine the delivery of a key employment sites, such as Site 9EA, based on market realities and viability constraints. Parking standards under Tables 5, 6, 20, 21, 22, and 32 in Chapter 9 should be omitted altogether.</p> <p>Chapter 10 – This whole chapter should be omitted. Micro-managing and restricting freight movements / routes / types of vehicles etc. Via ‘Management Plans’ would be unenforceable, impractical, and too commercially restrictive for most industrial sites (e.g. site 9EA). This approach to freight movements would undermine economic growth in the borough by deterring future inward investment, especially because competing boroughs/regions in the UK and</p>	<p>adopted, this SPD supersedes the existing Ensuring a Choice of Travel SPD and becomes the de factor SPD for transport advice and guidance. It is important for applicants to fully consider the impact of developments on transport and travel. If there are any doubts or uncertainty on any aspect, the Council recommends that applicants contact the Highways Development Control team to discuss. The proposed draft SPD is fully cognisant of the Travel Plans, Transport Assessments and Statements - GOV.UK (www.gov.uk) and directly references elements of this guidance. In particular it is clearly noted that the National Planning Policy Framework sets out that all developments which generate significant amounts of transport movement should be required to provide a Travel Plan. Local Planning Authorities must make a judgement as to whether a proposed development would generate significant amounts of movement on a case by case basis. The existence of an extant scheme or a fallback position does not negate the need to consider assessments of any updated proposals to determine if prior conclusions remain valid. The extent of any new assessment requirements will be determined through the scoping process, where prior conclusions and agreements will be taken into account. Parking Standards as set out are necessary to support our preferred future as set out in chapter 2.</p> <p>Comments noted, and no changes required. It is an NPPF policy requirement that overnight lorry parking is considered (NPPF paragraph 113). Council Officers interpret this as overnight needs and early arrival needs and thus a Freight Management Chapter is considered appropriate. The Council is not seeking to control routes. It is recommending that developments minimise impacts where possible. This could include for example advising drivers of suggested/preferred routes to use through measures which are readily used by the logistics industry at present. HGV</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>elsewhere do not adopt this officious and overly restrictive approach. For these reasons Table 40 (Monetary Contributions) for monitoring these Management Plans is also an unnecessary and unjustified.</p> <p>Chapters 11 and 12 – Relevant conditions and monitoring should be amended/flexed to reflect our comments above. Any conditions and monitoring relating to ‘Operational’ Management Plans associated with industrial development should be completely omitted.</p>	<p>Management Plans have been produced for Omega, Parkside Phase 1, Florida Farm Unit 3 and have been accepted by the Planning Service (see planning portal). It is not expected that every site with a freight and lorry distribution provision will require an HGV Management Plan. Please do contact the Highways Development Control team if there is any uncertainty. Monetary contributions to support HGV Management Plans is not unnecessary and unjustified. As stated, it is an NPPF requirement and incumbent on applicants to manage lorry parking. Measures included are a reference point as to how freight can be managed and accord with regularly used measures within the logistics industry, and do not represent an instruction. In the event a monetary contribution is required but ultimately the Council does not spend the allocation then the contribution is returned.</p> <p>Comments noted, and no changes required. It is unlikely that HGV Management Plans will be required for every site that contains a freight and lorry distribution provision. Chapter 10 is targeted at sites that generate significant amounts of freight and where there is known risk of overspill / inappropriate off-site lorry parking from existing sites. It is expected that where an HGV Management Plan is deemed necessary, it will be delivered as part of the Planning Application and not via condition.</p>
Historic England	Encourage the consideration of the historic environment in the production of your SPDs. Advice that we seek advice from the local authority conservation officer and from the appropriate archaeological staff, who best placed to provide information on the historic environment.	Comments noted, and no changes required.
Knowsley Council	We do not think paragraph 11.38 is worded strongly enough. Development in St Helens that would	Comments noted. Council notes the concern and will update text accordingly with reference to NPPF paragraph 114 part d,

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>impact Knowsley highways would require mitigation. As far as we are aware a planning condition wouldn't be suitable. The other paragraphs we looked at state either "mitigation" or "developer contributions", so for us paragraph 11.38 should do the same. The paragraph could contain additional wording at the end. For example: <i>Where development is of sufficient scale to have an operational impact / bearing on neighbouring authorities, it is advisable to review planning conditions with these authorities, especially in instances of bus services, travel planning measures and off-site works. Planning obligations could be used where it is not possible to address operational impacts through a planning condition, which would otherwise have a bearing on neighbouring authorities.</i></p>	<p>whereby "(d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."</p>
<p>Lead Local Flood Authority, Lancashire County Council</p>	<p>As the proposals lie outside of the Lancashire County boundary – no comments to make.</p>	<p>Comments noted, and no changes required.</p>
<p>Lead Local Flood Authority, St Helens Borough Council</p>	<p>LLFA understand that work solely on the highway may come under permitted development and not always consider SuDS. LLFA welcomes the acknowledgement in the document to tackle flood risk, in where practical SuDS should be considered (section 5.19).</p> <p>In section 5.19 the spelling and acronym for SuDS is incorrect. The document indicates Sustainable Drainage Systems (SUDS), where it should be Sustainable urban Drainage Systems (SuDS). The U is lower case.</p>	<p>Comments noted, and no changes required.</p> <p>Comment noted, and this will be corrected in the final version</p>
<p>Lichfields on behalf of Taylor Wimpey and Story Homes</p>	<p>Policy Context Local Plan Policy LPA06 (Transport and Travel) seeks to secure the delivery of new or improved</p>	<p>Comments are noted, and all references to NPPF will be updated to reflect the latest version (2023) that was released as</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>road, rail, walking, cycling and/or bus infrastructure where required, ensure development is accessible by road transport, walking, cycling and public transport, improvements to motorway capacity and secure delivery of a new rail station. The draft SPD should also be prepared in accordance with Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations (2013) and the National Planning Policy Framework 2023 [NPPF].</p> <p>Demand and Provide At the outset, we are supportive of the Council stating that they are moving away from the outdated Predict and Provide method for assessing highway impact. The revised approach of decide and provide is more acceptable and takes into account a more holistic perspective which will hopefully result in a modal shift away from the private car.</p> <p>Design & Access Statements The draft SPD sets out details on what a Design and Access Statement should include. It is unclear why this section is included within this draft SPD and it would be more appropriately placed within the draft Design SPD.</p> <p>Design Principles for Active and Sustainable Transport Paragraph 6.24 and 6.25 sets out examples for design and infrastructure that should be considered. Taylor Wimpey and Story Homes are supportive of these wider considerations; however, these would</p>	<p>the draft Transport and Travel SPD was launched for consultation in December 2023.</p> <p>Support is noted, and no changes required.</p> <p>Comments are noted, and no changes required. The draft SPD sets out to provide a one stop shop for transport and travel advice and guidance, hence the inclusion of Design and Access Statements in the SPD. The Council welcomes all relevant SPDs to be reviewed when developing an application.</p> <p>Comments are noted. All elements of the SPD are subject to the identified overarching policy requirements. In terms of viability the following paragraph on viability has been added to the draft SPD introduction.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>need to be considered in the context of viability and should not prevent development coming forward.</p> <p>Parking Standards Paragraph 9.76 states that the Council recognise that the amount of parking that needs to be provided should not be fixed, should acknowledge variation in accessibility levels and travel patterns across the different areas of the borough, should recognise differences in vehicle types and align with place-making aspirations. It is noted that a zonal approach is put forward to indicate maximum parking standards, based on the zone in which a site falls within. Notably, Figure 17 on page 101 sets out defined zones for parking standards. Although housing allocations are identified on the map, some parts of St Helens do not fall within a parking zone. For sites that come forward outside of the zones identified, the SPD should clarify how the standards should be applied. Taylor Wimpey and Story Homes are supportive of the residential electric vehicle parking standards set out in Table 31 of the draft SPD.</p>	<p><i>'It is the responsibility of the applicant to take into account any costs including their own profit expectations and risks and ensure that proposals for development are policy compliant. Where the principles set out in the SPD impact upon the viability and deliverability of a development, the applicant can argue a case for non-compliance, by preparing a viability appraisal to be shared with the Council. This does not, however, exempt the developer from adopting the process set out in this SPD</i></p> <p>Comments are noted, and no changes required. The SPD must be flexible enough to apply to a centrally located brownfield site of ~10 units as well as a centrally located brownfield site of ~1000 units. Differences in the accessibility levels, which have a bearing on commercial considerations, are taken into account and sufficient scope exists to adjust assumptions where agreed. The zonal approach as set out within the SPD provides a starting point, however site-specific considerations may be required. It is also worth noting that the Ensuring a Choice of Travel SPD, as well as all neighbouring authorities, use maximum parking standards. For the reasons stated above, Council is satisfied that sufficient flexibility exists within the draft SPD to justify parking to the maximum levels, and where required exceedances of set levels. With regards to sites that fall outside of a parking zone, Paragraph 9.94 of the SPD states <i>"When considering development directly adjacent to any particular zone, the start assumption should be that development be considered a logical extension to that zone. However, this is not considered a stringent rule and discussion should take place with the Transport Development Control team to agree the start point zone for any development."</i></p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Planning Conditions Section 11 of the draft SPD sets out the standard wording of transport and travel related conditions which could be attached to Decision Notices. Planning Practice Guidance Paragraph: 001 (Ref ID: 21a001-20140306) states that “<i>the objectives of planning are best served when the power to attach conditions to a planning permission is exercised in a way that is clearly seen to be fair, reasonable and practicable. It is important to ensure that conditions are tailored to tackle specific problems, rather than standardised or used to impose broad unnecessary controls</i>”. The inclusion of standard conditions should be removed from the SPD so that no unnecessary restrictions are placed on residential development. Every effort should be made to deal with matters prior to the determination of the application to avoid unnecessary conditions.</p> <p>Overview of draft SPD:</p> <ul style="list-style-type: none"> • The draft Transport and Travel SPD does not reference any site-specific requirements in line with the site allocations identified in St Helens Local Plan. In this regard, the draft SPD does not provide more detailed advice or guidance on a site-by-site basis. • It is critical that the interrelationship between the existing Bold Forest Area Action Plan, the emerging Bold Forest Garden Village Masterplan SPD and the draft Developer Contributions SPD is aligned to ensure there are no inconsistencies between the aspirations of the documents. The relationship between, and weight given to each 	<p>Comments are noted, and no changes required. The inclusion of a Conditions chapter is an attempt to provide clarity in relation to PPG advice. Paragraph 11.7 of the draft SPD is clear that: <i>"The standard conditions, reasons and informatives listed are not meant to be prescriptive and should only be used when they properly meet the case. Where circumstances demand bespoke conditions and reasons, they should follow a similar format and care must be taken to ensure that they are consistent with any used in the standard form and are not mutually exclusive."</i></p> <p>It is also worth noting that paras 11.9 and 11.10 of the draft SPD clearly outline when and how conditions will be used, and how they are derived to assist and not hinder the process. For the reasons stated above, the Council believes a conditions chapter should be retained as it serves a useful purpose.</p> <p>Comments are noted, and no changes required Site specific requirements would only be referenced where a bespoke SPD is to be produced for a single site. Site specific requirements are identified in Appendix 5 of the Local Plan, and further requirements are made by referencing the Infrastructure Delivery Plan and the Local Plan evidence base documents, such as the Sustainable Transport Impact Assessment With regards to the relationship between SPDs and weight given to each SPD, SPDs cover unique points and are to be considered in that regard. There is no weighting in favour of one over another.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>SPD should be set out clearly at the outset of each SPD.</p> <ul style="list-style-type: none"> • We are pleased to note that this draft SPD reflects the most up to date Local Plan policy context. • The draft SPD should ensure high quality development and not prevent development all together. The draft SPD should place a greater emphasis on viability and feasibility to ensure transport considerations do not act as a barrier to development. <p>Summary We welcome the opportunity to provide a representation to this draft Transport and Travel SPD consultation and is broadly supportive of the SPD subject to the SPD being refined to only focus on providing additional guidance in relation to Policy LPA06. The SPD should not add unnecessarily to the financial burdens on development to ensure development can be brought forward viably.</p>	<p>Comments are noted. With regards to viability, this is the remit of the draft Developer Contributions SPD. Viability is also inherent to policy requirements (local and national) which are referenced in this SPD. Further clarity will be provided via the inclusion of the following paragraph to the draft SPD introduction. <i>'It is the responsibility of the applicant to take into account any costs including their own profit expectations and risks and ensure that proposals for development are policy compliant. Where the principles set out in the SPD impact upon the viability and deliverability of a development, the applicant can argue a case for non-compliance, by preparing a viability appraisal to be shared with the Council. This does not, however, exempt the developer from adopting the process set out in this SPD.'</i></p> <p>Broad support noted – no changes required.</p>
Liverpool City Region Combined Authority (LCRCA)	The LCRCA welcomes reference in the draft SPD to the alignment with the emerging SDS, the existing Local Transport Plan and the emerging LCR Local Transport Plan 4. Reference to the move towards a LCR franchised bus system and the SPD's	Support noted and no changes required.

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>alignment with LCR transport strategies and documents, including the LCR Local Journeys Strategy, the LCR Local Cycling and Walking Infrastructure Plan, the LCR Bus Services Improvement Plan and the LCR Long-term Rail Strategy is supported and welcomed. The LCRCA is also supportive of the draft SPD's proposed 'Decide and Provide' approach to transport planning for development and the strong focus on active travel, as this aligns with the approach in the emerging SDS, the emerging LTP4 and in wider LCRCA policy and strategies, which seek to tackle and mitigate climate change, promote better health, improve access to opportunity and promote social inclusion. It is considered that the Draft SPD accords with the emerging SDS (Towards a Spatial Development Strategy for the Liverpool City Region to 2040, November 2023) Policy LCR DP10 - Sustainable Transport and Travel, which seeks to ensure that development plans and proposals across the LCR improve transport connectivity in ways that enable sustainable growth, promote modal shift, reduce carbon emissions, improve air quality and ensure safety.</p>	
Mersey Forest	<p>Using the Forest Plan to incorporate green infrastructure into travel will help to achieve climate goals set for the borough. Green infrastructure, such as street tree planting and the use of SuDS, alleviates the threat of flooding, supports biodiversity, reduces urban heat island effects, and encourages active travel, making it vital for mitigating climate effects and achieving net zero by 2040.</p>	Comments are noted, and no changes required

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
National Highways	<p>The principles within the SPD are broadly in line with DfT Circular 01/2022, with a move towards a more vision-led approach to planning, though in the context of the document it is instead referred to as 'decide and provide'. We would recommend that the SPD goes further by encouraging developers to consider their 'vision' for the site ahead of any transport planning, which begins by ensuring that the location of the site is first and foremost sustainable in nature. Where applications are made for sites that might impact the SRN, we would be looking for this vision as a key element within a developer's transport assessment. Further details on how a vision might be considered and assessed are available within National Highways' Planning for the Future document, available on the gov.uk website. Paragraph 33 states the following:</p> <p><i>In broad terms, a vision-led approach can be summarised as follows:</i></p> <ol style="list-style-type: none"> <i>1. Establish a vision - understand the relevant national and local policy context; identify the drivers of change/key external factors acting on the plan or proposed development; set-out a place-based vision statement with associated outcomes that supports the principles of sustainable development.</i> <i>2. Develop scenarios - develop plausible future scenarios that help to understand the uncertainties that may impact on the ability to deliver the vision.</i> <i>3. Generate options – generate, sift and prioritise options that can help achieve the vision.</i> 	<p>Comments noted, and no changes required. A 'vision' is a key component of the National Model Design Code (NMDC), which is referenced in the draft SPD and indirectly referenced through the NPPF references. The NMDC is clear that Design Codes should include a vision, but that design codes are not necessarily site specific. The parallel draft Design SPD is considered the most applicable location for references to 'vision'. Within this draft Transport and Travel SPD, the Council refers to 'Decide and Provide' because the main technical plank of our approach is the TRICS Decide and Provide guidance. This guidance is fully referenced in the draft SPD wherein it is clear that D&P is a vision led technique. Chapter 6 of the TRICS Decide and Provide guidance fully explains how a visioning approach should occur. To conclude, a visioning approach is therefore part of our recommended Decide & Provide, and not above it.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p><i>4. Test options – test how the prioritised options perform in each of the plausible future scenarios (for example, is every option effective in all scenarios or are some less resilient and have some significant risks?).</i></p> <p><i>5. Produce a vision strategy – produce a strategy for realising the vision that accounts for the identified uncertainty and includes a ‘monitor and manage’ approach to identify and address when the vision is unlikely to be achieved.</i></p> <p>We would therefore recommend the inclusion of the Circular and the Planning for the Future guide as key documents for considering development sites not only where they impact the SRN, but as a good starting point for all developers bringing forward a vision-led development. We would also recommend the inclusion of the Circular as a key consideration when determining the need for HGV parking facilities for new developments</p>	<p>Comments noted, and the SPD will be updated to include reference to DfT Circular 01/2022.</p>
<p>Nexus Planning on behalf of BXB (Cowley Hill) Ltd.</p>	<p>BXB support the Council’s objectives of seeking to promote active travel and reduce reliance on the car. We note the proposed spatial approach to car parking standards, with more central locations generally having lower maximum standards for car parking than village and rural locations. This approach is broadly derived from the relative accessibility of each zone. Cowley Hill is in Zone B ‘Key Towns and Other Settlement’ with the following proposed standards:</p> <ul style="list-style-type: none"> 1 space per one bed dwelling 1.25 spaces per two bed dwelling 1.5 spaces for three bed dwellings and greater 	<p>Support noted, and no changes required.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Whilst the availability of in-curtilage parking may be argued to discourage car use it, in itself, is likely to be a relatively blunt tool (as is noted in Streets for a Healthy Life), with access to public transport, access to services within walking and cycling distance and the quality of the public realm likely being more determining factors in residents propensity to use a car on a day to day basis. Usage between car owners in more or less accessible locations may therefore vary significantly. An important driver therefore in seeking reductions to car usage (aside from ownership) is to focus residential development in central, accessible locations such as Cowley Hill.</p> <p>Delivering a challenging brownfield site such as Cowley Hill will require the maintenance of significant market interest and confidence in the site, both from housebuilders and prospective homeowners and renters and BXB are concerned that restricting car parking to relatively low, maximum levels will reduce that interest and leave the site at a competitive disadvantage against other less accessible planned or existing residential areas – without any evident benefits in reducing car usage. Experience of course also suggests that where in-curtilage parking is not available, drivers will park on the street (and pavement) reducing the quality of the public realm and discouraging walking and cycling. Very concerned about the application of relatively low maximum car parking standards on sites such as Cowley Hill and consider that this approach should be refined to allow for some flexibility, particularly on centrally located, brownfield sites, to facilitate their</p>	<p>Comment noted and no changes required. With regards to parking, NPPF Para 112 states: "<i>Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport</i>".</p> <p>The SPD must be flexible enough to apply to a centrally located brownfield site of ~10 units as well as a centrally located brownfield site of ~1000 units. Differences in the accessibility levels, which have a bearing on commercial considerations, are taken into account and sufficient scope exists to adjust assumptions where agreed. The zonal approach as set out within the SPD provides a starting point, however site specific considerations may be required. It is also worth noting that the Ensuring a Choice of Travel SPD, as well as all neighbouring authorities, use maximum parking standards. For the reasons stated above, Council is satisfied that sufficient flexibility exists</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>development. Echoing NPPF (para 112) it is not considered that in the case of sites such as Cowley Hill the test of a 'clear and compelling justification' has been achieved, nor the adverse implications for delivery fully considered.</p>	<p>within the draft SPD to justify parking to the maximum levels, and where required exceedances of set levels.</p>
Peel L&P	<p>The SPD is very extensive but currently does not detail fully how policy will address the target of carbon neutrality (net zero by 2040) for HGV's.</p> <p>Paragraph 9.198 Electric Vehicles does not specifically deal with LGV and HGV EV charging points (EVCP) and how this will also play a large role in achieving net zero by 2040. St Helen's key transport routes e.g. M6 and A580 provide a key opportunity for the SPD to detail the approach to promoting increased HGV EVCP which can also assist in addressing lorry parking issues.</p> <p>Chapter 10. Freight Management / 10.10 Lorry Parking sets out in detail the existing issues. It should be recognised that HGV Management Plans, as part of new proposals, cannot be required to address the current situation but not to have any additional negative impacts. Where proposals can address existing issues, this should be acknowledged as a further benefit weighing in favour of allowing the development. This will also better reflect the NPPF December 2023 (paragraph 113)</p>	<p>Comments noted, and no changes required. In terms of supporting the transition to net zero, with regards to freight management and lorry parking, the Council will be guided by measures included within Decarbonising Transport – A Better, Greener Britain.</p> <p>Comments noted, and no changes required. In terms of LGV and HGV EVCI/P requirements, at this point in time there is still uncertainty about how the market and infrastructure requirements will develop making it difficult to specify needs. The Liverpool City Region Combined Authority is developing a regional LCR contract opportunity for EV charging infrastructure and the private sector continues to deliver infrastructure on public and private land across the UK. The Council will review opportunities via the upcoming LCR contract opportunity to explore delivery of EV charging infrastructure for a range of use cases.</p> <p>Comments noted, and no changes required. The Council agrees that HGV Management Plans should not be used to address the current situation/existing issues. The purpose of the HGV Management Plan is to address lorry parking issues stemming from anticipated use of the proposed site in line with Paragraph 113 - National Planning Policy Framework.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>which requires planning policies to recognise the importance of providing adequate overnight lorry parking facilities and proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use. Freight management and lorry parking can also be key in the transition to net zero in promoting more sustainable fuelling technologies e.g., biomethane or compressed natural gas and hydrogen alongside EVCPs and is an opportunity not fully set out by the SPD.</p>	
<p>Pegasus Group on behalf of Redrow Homes Ltd</p>	<p>The SPD ensure that moving forward and following this consultation, that the SPD is consistent with the December 2023 NPPF.</p> <p>Page 44 of the SPD contains additional guidance relating to Street Design for Sustainable and Active Travel. Whilst the above is stated as guidance, the wording is strict and does not allow sufficient flexibility – instead it reads as a need to comply. Redrow object to the guidance as currently worded, as it seeks to introduce new requirements above that stated in adopted national and local policy and also raises viability and deliverability concerns.</p> <p>Sustainable Distance Criterion Starting with criterion c), it is expected that all properties are located within 400 metres walking distance of a bus stop and within 800 metres walking</p>	<p>Comments are noted. As a general point, there is a risk of any SPD becoming quickly outdated at point of adoption, Council therefore recommends that the latest available versions of any local, regional and national policy and guidance note or link included within this draft SPD is referred to where practical. The draft SPD will be amended to ensure all NPPF references are up to date.</p> <p>Comments are noted, and no changes required. Guidance included on page 44 align with the requirements of NPPF, particularly paras 114 and 116, which state "<i>development should ensure that</i>" and "<i>Application for development should</i>". The wording of these policies is strict and is supported by the National Design Guide, National Model Design Code and other documents such as LTN1/20. The specifics of design will be fully discussed as part of pre-application and post-application processes.</p> <p>Comments are noted, and no changes required. Regarding the 400m and 800m distances referenced, these are widely used and accepted distances since their introduction by IHT in 1999. These distances have in turn been consistently adopted, carried</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>distance to a rail station. Redrow do not support this criterion which will lead to deliverability concerns and could exclude a number of development sites coming forward that are sustainably located and in turn lead to housing land supply issues. The wording is too strict as currently worded, and also seeks to introduce stringent distance requirements which are not stated in adopted Local Plan Policy LPA06 (Transport and Travel), which quite rightly, does not state specific distance requirements in order for a development to be deemed sustainable; instead, it recognises that this is a matter to be considered on a site by site basis. Given SPDs are not permitted to introduce new requirements above and beyond adopted policy, this site by site flexibility should be retained, with specific distances removed, or the language softened; otherwise this prescriptive requirement risks undermining the delivery of the Borough's development requirements as outlined in the development plan. Furthermore, criterion c) is particularly concerning given that it also fails to consider viability and deliverability matters. The criterion, as currently worded, could effectively exclude a number of sites coming forward in the Borough (including brownfield sites) which do not fall within the 400m and 800m distances but are still highly suitable and sustainable residential sites. The requirement is also concerning when read alongside criterion e). The wording as currently proposed is not flexible and fails to take account of viability matters. This is particularly concerning given that there are known viability issues in certain areas of the Borough, which was discussed at length during the</p>	<p>over and referenced with Merseyside and Liverpool City Region Local Transport Plans all of which have had input, agreement and sign-off by each individual LCR Local Authority. Furthermore, in terms of LPA application of accessibility distances, when the Green Belt Review was undertaken for the St Helens Local Plan, the proposed accessibility standards (taken from the current Ensuring Choice of Travel SPD) were used to assess the accessibility of potential sites. The purpose of the stated distances is to ensure good public transport accessibility throughout the region is considered from the outset where possible with mitigation considered where practical. As before we recommend any issues of concern or uncertainty to be discussed at the earliest convenience with the Transport Development Control Team.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>examination in public of the Local Plan. The above wording could lead to further viability pressures and Redrow therefore recommend that the wording '<i>where viable and feasible</i>' is inserted at the beginning of criterion e). Finally, criterion d) should be made clear that such a requirement will only be requested if it meets the planning obligation tests as confirmed at NPPF paragraph 54, Reference ID: 10-002-20190509. As highway contributions are generally dealt with on a case by case basis, the above guidance further highlights the importance of considering viability matters when requesting them – as these will not have been fully tested in terms of potential viability implications at the Local Plan stage.</p> <p>Accessibility Standards Assessment Whilst stated as 'guidance', the proposed wording does not provide flexibility or appropriately consider viability or deliverability considerations. An example of this is contained at criterion e). Again, this approach is considered far too stringent and fails to consider viability. Redrow do not support this approach and recommend that as a minimum, '<i>where viable and feasible</i>' wording is added to the guidance to allow flexibility and consideration on a site by site basis. A review of the MASA checklist contained at Appendix A of the SPD highlights further concerns. It is proposed that development is to be scored against the checklist criteria. The detailed checklist proposes to score developments against locational / sustainability criteria not contained within the adopted development plan. The</p>	<p>Comments are noted, and no changes required The MASA provides a checklist to ensure that developments that are well considered and located with strong accessibility are scored highly from the outset in line with our Local Plan and strategic objectives. Where an application has a lower score, this does not necessarily rule out any development but indicates that further consideration and mitigation might be necessary. It is important to establish criteria in order to then fairly apply any scoring. The MASA has been in place since the adoption of the Ensuring a Choice of Travel SPD in 2010. Given our commitment to Net Zero and decarbonisation it was decided that a scoring mechanism (which neighbouring LAs have applied since 2010) should be introduced to provide further impetus to deliver sustainable accessible developments as a priority with mitigation required where practical for lower scoring submissions on a case-by-case basis. With regards to the detailed checklist not being included within the adopted development plan, the</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>checklist is far too prescriptive and poses constraints on bringing sites forward which are sustainable but could be negatively scored because they do not fall within specific distances. A more nuanced approach is required – as without it, meeting the strategic development requirements of St Helens could be significantly undermined. Whilst it is acknowledged that the role of SPDs is to provide additional guidance to adopted policy, it should not introduce new requirements which could undermine the delivery of suitable development sites and indeed the strategic development requirements of St Helens. For the reasons set out above, Redrow object to the MASA checklist contained at Appendix A and suggest it is removed. In addition, the guidance contained at page 51 of the SPD needs to be far more flexible and read more as guidance rather than a stringent requirement. Criterion e) in particular reads as a very top-down approach which does not take account of site-specific circumstances including site constraints, feasibility, viability etc. Additional wording must be added such as 'where feasible and viable' to ensure that the deliverability of suitable housing/other development sites is not hampered.</p> <p>Transport Statements, Transport Assessments and Travel Plans Section 8 of the draft SPD sets out further detailed guidance on Transport Statements, Transport Assessments and Travel Plans. Further guidance is also contained at Appendix B. Paragraph 8.142</p>	<p>Local Plan sets the policies, and the draft SPD then provides the site assessment, design and guidance requirements. The Local Plan would not be expected to include specific criteria for assessments such as walk/cycle distance thresholds. The checklist is cognisant of NPPF para 109, which states: <i>"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."</i></p> <p>The MASA seeks to identify specific areas of accessibility weakness and determine whether there are solutions to those which would aid meeting NPPF para 114, point a. <i>"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: (a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location"</i>. Please note that the draft SPD is not introducing new requirements, it is providing the assessment framework to support LPA06 (and other policies) to ensure that new development is sufficiently accessible by road transport, walking, cycling and public transport, as well as improving the accessibility to jobs, homes and services by all modes of transport.</p> <p>Comments noted. The fairness and reasonableness of monitoring fees has been inherent to their derivation. It is considered that the suggested fee scale is fully representative of the 2019 CIL Regulations and is cognisant of the true costs of undertaking in-house monitoring via an Officer team. This is why</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>states how the implementation of a Travel Plan can be undertaken via two different methods: Option 1 - The Council has full responsibility for implementation and management of the Travel Plan (with contribution provided by the applicant for this). This is suggested for residential and other development land uses separately, and Option 2 - The applicant/developer/occupier retains responsibility for funding, managing, and implementing the Travel Plan. This option requires a non-refundable monitoring fee. Appendix B confirms that the Council's preferred option is option 2, which Redrow also support. Appendix B also sets out monitoring fees, which are stated to be indicative and vary from site to site. The fees are based on a monitoring period of 5 years. The Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019 states that in respect of the cost of monitoring in relation to the delivery of planning obligations: <i>(a) the sum to be paid fairly and reasonably relates in scale and kind to the development; and</i> <i>(b) the sum to be paid to the authority does not exceed the authority's estimate of its cost of monitoring the development over the lifetime of the planning obligations which relate to that development.</i> This test should equally apply to monitoring fees for Travel Plans. Therefore, it must be ensured that the monitoring fee requested is fairly and reasonably in scale and kind to the development – which Redrow considers is best determined at the planning application stage and on a case by case basis.</p>	<p>it is stated that "<i>monitoring fees have been calculated to only cover reasonable costs incurred, relating to all monitoring tasks such as multi-modal counts. Charges for monitoring services will not generate a profit</i>". The Council acknowledges that further clarity in this issue could be introduced and therefore Appendix B will be updated to state "<i>the fees noted will be cognisant of the bespoke nature of each Travel Plan and the complexities therein. If necessary, alterations can be made in discussion with the Council and to their agreement</i>"</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Redrow therefore object to the indicative fees suggested and recommend that they are removed from the SPD so that these matters can be considered during the planning application process.</p> <p>Parking Standards Chapter 9 of the SPD discusses Parking Standards. Redrow object to the proposition that integral garages/garages attached to a dwelling (paragraphs 9.56-9.57) will not be counted as a car parking space. Redrow's 4 bed detached house types utilise integral garages –which have been commonly accepted by numerous planning authorities as an acceptable car parking space. The proposal to not count integral garages as a parking space is presumably rooted in a concern that the garages will not be utilised and will result in on street parking. In Redrow's experience this is not the case and the requirement to provide an additional parking bay upfront/to the side of a house would have a streetscene impact that is not favourable in design terms. Furthermore, it would lead to less efficient site densities and layouts. Combined together, this is not a favourable solution. Redrow therefore strongly object to not counting integral garages as a parking space and politely suggest this is revisited by the Council.</p> <p>The SPD proposes to set parking standards by zone, with paragraph 9.161 stating that Zone C and D are in line with previous St Helens guidance and Zone A and B are based on benchmarking exercise. Tables 12 and 13 relate to C3 Use Class. Redrow do not</p>	<p>Comments noted and no changes required. The CIHT technical note on residential parking notes the following: "<i>garages are often used for storage rather than parking, especially when the internal dimensions do not relate to the size of modern cars. Where garages are to be provided, additional curtilage and/or on-street parking is likely to be required. Open car ports and car barns are more likely to be used for parking</i>" (Chapter 4 res_parking_design:Layout 1 (ciht.org.uk))</p> <p>"<i>The key issue when determining the size and nature of parking spaces is will they be used, or abused? A single garage needs to be big enough for additional storage, and even then it may not be used for parking. A double garage may only be used for a single vehicle</i>". (chapter 4 res_parking_design:Layout 1 (ciht.org.uk)) A key question posed by CIHT is "<i>If garages are included, are they likely to be used to an extent that will contribute to the overall accommodation of expected levels of ownership?</i>" For these reasons no changes are required.</p> <p>Comment noted. The SPD will be updated to remove reference to a communal bicycle space.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>have any detailed comments on the car parking standards, but do not support the requirement for 1 communal bicycle space per dwelling. This is in addition to the standard 2 bicycle spaces per dwelling and the 1 additional space required for each bedroom above 3. It is not clear/no justification is provided as to why an additional communal space is required. It is considered that the baseline cycle parking standards will provide more than sufficient cycle parking on residential development sites which will encourage sustainable modes of travel, therefore the reference to a communal bicycle space should be removed as it will have unnecessary implications in respect of cost and site layouts.</p> <p>Electric Vehicles Paragraph 9.198 onwards discusses electric vehicles (EV) – with further detail contained at Appendix E. In relation to residential development (Use Class C3), it is considered that the additional guidance contained in the SPD is unnecessary. This is because EV charging is now a mandatory requirement for all new dwellings as set out in Building Regulations. Appendix E does refer to the relevant Building Regulations – which is supported; however, it is considered that the additional guidance contained in Appendix E can be stripped back/removed and that reference just needs to be made to Building Regulation requirements. As a general comment, the SPD is very long (233 pages), therefore for simplicity and ease of reading it is recommended that the SPD is condensed/simplified</p>	<p>Comment noted and no changes required. The purpose of the Transport and Travel SPD is to provide a one stop shop of transport policy and guidance for applicants reducing the need to search through multiple documents and websites. This also includes providing wider context, summaries of requirements where necessary, as well as signposting where relevant to information and requirements that may be located elsewhere.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>where possible and that it does not need to replicate Building Regulations.</p> <p>Parking Dimensions and Accessibility Page 135 of the SPD provides further guidance on residential driveway and garage widths. Redrow object to detached tandem double garages only being counted as one parking space. There is no justification provided as to why double garages would not be used for two car parking spaces and this will only lead to a need for further frontage/side parking which would have an impact on the streetscene which is not favourable in design terms. This sentence should be removed from the SPD.</p> <p>Planning Conditions and Informatives Section 11 of the SPD outlines example highway planning conditions and informatives. Whilst template/example conditions can be helpful, Redrow consider that such matters are best dealt with on a case by case basis. Upon review of the draft conditions, some contain a significant amount of information that may not be relevant to certain sites/developments. Notwithstanding these comments, Redrow do welcome the wording which allows for site remediation/clearance works on the draft conditions – as this assists with commencing development on site as soon as possible.</p>	<p>Comments noted. Council understands that the approach to detached garages is likely to be different by housebuilder, therefore a caveat will be included in chapter 9 to clarify that garages will be considered on a design basis as well. Ergo Council will not rule out one counting toward two parking spaces subject to specific design criteria.</p> <p>Comment noted and no changes required. The inclusion of a Conditions chapter is an attempt to provide clarity in relation to PPG advice. Paragraph 11.7 of the draft SPD is clear that <i>"The standard conditions, reasons and informatives listed are not meant to be prescriptive and should only be used when they properly meet the case. Where circumstances demand bespoke conditions and reasons, they should follow a similar format and care must be taken to ensure that they are consistent with any used in the standard form and are not mutually exclusive."</i> It is also worth noting that paras 11.9 and 11.10 of the draft SPD clearly outline when and how conditions will be used, and how they are derived to assist and not hinder the process. For the reasons stated above, the Council believes a conditions chapter with text as stated should be retained as it serves a useful purpose.</p>
Rainhill Civic Society	Not happy with the timing of the consultation	Comments noted, and no changes required.

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
The Coal Authority	No specific comments to make on any of these draft SPDs.	Comments noted, and no changes required.
United Utilities	We request that this SPD identifies the need to carefully consider any new strategic road infrastructure that passes through large sites. This road infrastructure may represent a conduit for new infrastructure to service a proposed development. The design of any such road should be informed by consultation with the relevant infrastructure providers and in cognisance of any site-wide strategy for infrastructure.	Comments noted and no changes required. Council believes that these references are better suited for inclusion within the Street Design Guide which is currently being updated.
WSP on behalf of Barratt / David Wilson Homes	<p>To assist in delivering a Preferred Future the Council will encourage applications to refer to the following TRICS and Transport for North (TfN) guidance for further information:</p> <ul style="list-style-type: none"> ▪ TRICS Decide and Provide Guidance Note ▪ Transport for the North Future Travel Scenarios” <p>The SPD requirements could result in the need for additional trip generation scenarios to be tested, applying the latest TRICS Decide & Provide guidance. This guidance should make it clear that this would not be applied to planning applications which have already been submitted and considered by the LHA.</p> <p>Page 176 of the draft SPD recommends travel plans as a condition for certain types of residential development. BDW welcome the aspirations to require travel plans for residential developments in order to encourage the modal shift from vehicles to active travel and public transport via planning conditions however the above wording should be more specific with an SPD as to the threshold of</p>	<p>Comments noted and no changes required. The new SPD will not be applied retrospectively to applications already submitted and being considered by the LHA.</p> <p>Comments noted and no changes required. There are no specific triggers identified for a Travel Plan. NPPF Paragraph 111 notes that "<i>all developments which generate significant amounts of transport movement should be required to provide a Travel Plan. Local planning authorities must make a judgement as to whether a proposed development would generate significant amounts of movement on a case by case basis (ie significance may be a lower threshold where road capacity is</i></p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>development dwellings that would trigger the need for a travel plan for consistency.</p> <p>Minimum Accessibility Standard Assessment (MASA) MASA assessments have been undertaken for the development within the TA, however the requirements for the MASAs have changed slightly within the updated SPD. The previous guidance required that a single MASA be undertaken for public transport (comprising both bus and rail elements), however the draft SPD requires separate MASAs to be undertaken for bus and rail (although following the same principles as previously). The guidance should make it clear that this would not be applied to planning applications which have already been submitted and considered by the LHA.</p> <p>Cycle Routes The document cites the need to provide cycle routes within development layouts however the SPD needs to provide specific detail with regards to expectation. The document should list confirmed and funded active travel schemes within the Borough and how developments are expected to consider design. In addition, further clarification needs to be given as to the type and nature of the 'route' i.e. is there an expectation that this is to be a segregated cycleway or shared use path or cycle markings on a road along with supporting evidence base/justification.</p>	<p><i>already stretched or a higher threshold for a development which proposes no car parking in an area of high public transport accessibility)".</i> The proposed text is cognisant of this. The draft conditions are offered as a guide to both the LPA and developers and can be amended to suit specific requirements.</p> <p>Comments noted and no changes required. The new SPD will not be applied retrospectively to applications already submitted and being considered by the LHA.</p> <p>Comments noted and no changes required. The SPD makes specific reference to the St Helens Local Cycling and Walking Infrastructure Plan (LCWIP). It is this document which contains the Council's identified walking and cycling network improvements. The SPD also references LTN1/20, which will be used as guidance in determining the type of cycle infrastructure that needs to be incorporated into the development itself. There are specific guidance requirements within LTN1/20 which aid this point.</p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Parking Standards The parking standards for C3 Dwellings have been revised within the Draft SPD. The guidance should make it clear that this would not be applied to planning applications which have already been submitted and considered by the LHA. Figure 17 shows the defined zones for parking standards. With respect to housing allocations, further clarify is needed on the map with regards to which zones these will sit in, it is unclear whether they will be washed over Zone B or default to Zone D.</p> <p>EV Charging Points It is stated within the SPD (paragraph 9.198 - 9.214) that proposals which require new parking spaces must incorporate electric vehicle charging points to facilitate the use of electric vehicles in accordance with Local Plan policies 'LPA06: Transport and Travel'. The SPD states that every new dwelling built on site with one or more dedicated parking space should be provided with one outdoor, weatherproof electric vehicle charging point readily accessible from one of the dedicated parking spaces. Whilst BDW supports the Council's aim to encourage energy efficiency and reduce greenhouse gas emissions through the encouragement of alternative fuels in accordance with Local Plan policies, the requirement for developers to provide electric vehicle charging at the standards it is proposing needs to be justified and based on robust evidence, which it does not appear to be. The</p>	<p>Comments noted and no changes required. The Transport and Travel SPD supersedes the Ensuring a Choice of Travel SPD. The new SPD will not be applied retrospectively to applications already submitted and being considered by the LHA. With regards to housing allocations that may be adjacent to zones, Paragraph 9.94 of the SPD states "When considering development directly adjacent to any particular zone, the start assumption should be that development be considered a logical extension to that zone. However, this is not considered a stringent rule and discussion should take place with the Transport Development Control team to agree the start point zone for any development."</p> <p>Comments noted and no changes required. All new developments and significant renovations are required to have EV charging points. Building Regulations have been updated to specify requirements around EVCI installation and came into force in June 2022, in particular the update states that; every new home, including those created from a change of use, with associated parking, must have an EV chargepoint. With regards to viability, this is the remit of the Developer Contributions SPD. Viability is also inherent to policy requirements (local and national) which are referenced in this draft SPD. Further clarity will be provided via the inclusion of the following paragraph to the draft SPD introduction. <i>'It is the responsibility of the applicant to take into account any costs including their own profit expectations and risks and ensure that proposals for development are policy compliant. Where the principles set out in the SPD impact upon the viability and deliverability of a development, the applicant can argue a case for non-compliance, by preparing a viability appraisal to be</i></p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>requirement for electric vehicle charging points should be subject to viability testing so as not to have a detrimental impact on the delivery and viability of housing. Furthermore, where the Council intends to use planning conditions to secure this provision, the SPD must be sufficiently robust and detailed to ensure that any conditions are enforceable and meet the necessary tests in the NPPF.</p> <p>Viability The SPD should also state that “<i>where necessary and appropriate, financial contributions to transport improvements should be subject to a viability assessment so to not unnecessarily impact upon the viability and/or deliverability of housing schemes</i>”</p>	<p><i>shared with the Council. This does not, however, exempt the developer from adopting the process set out in this SPD.</i></p> <p>Comments noted and no changes required. Viability is a key component of local and national policy which is fully referenced within this draft SPD. Specific matters pertaining to viability would be addressed via the Developer Contributions SPD. Further clarity will though be provided via the inclusion of the following paragraph to the draft SPD introduction. <i>‘It is the responsibility of the applicant to take into account any costs including their own profit expectations and risks and ensure that proposals for development are policy compliant. Where the principles set out in the SPD impact upon the viability and deliverability of a development, the applicant can argue a case for non-compliance, by preparing a viability appraisal to be shared with the Council. This does not, however, exempt the developer from adopting the process set out in this SPD.</i></p>

Consultation Summary

Design SPD

Overall, out of the initial 28 responses 22 made specific or general comments on the publication draft Design SPD.

A summary of the main comments raised include:

- The SPD duplicates both national and local policies;
- The SPD should highlight the need to include local character and context;
- Reference should be made to 10 Active Design Principles;
- A section on viability needs adding;
- Policy LPC12 should be referenced;
- The Mersey Forest Plan needs to be referenced; and
- Parking and garaging details need to be more flexible.

Developer Contributions SPD

Overall, out of the initial 28 responses 21 made specific or general comments on the publication draft Developer Contributions SPD.

A summary of the main comments raised include:

- Viability implications;
- BNG as additional costs to developers;
- Cost of building materials impacting housing development;
- Education costs and pupil surplus spaces;
- Other site-specific costs;
- Open space wording and costs;
- Affordable housing considerations, including update of the Affordable Housing SPD;
- The need for annual monitoring / tracking of S106 contributions; and
- Greater clarification required on figures used to request health related contributions.

Open Space Provision and Enhancements SPD

Overall, out of the initial 28 responses 19 made specific or general comments on the publication draft Open Space Provision and Enhancements SPD.

A summary of the main comments raised include:

- Object to the use of maximum occupancy rates;
- Current background evidence is out of date;
- Disagree with the proposed minimum 10-year period to retain/spend off-site financial contributions from receipt;
- Request flexibility in allowing POS typologies to be integrated and overlapped with other features;
- The definition of 'green space' should be better defined; and
- Two-bed apartment units should not have to provide children's play areas.

Transport and Travel SPD

Overall, out of the initial 28 responses 19 made specific or general comments on the publication draft Transport and Travel SPD.

A summary of the main comments raised include:

- The laying out of active travel routes including cycle routes within schemes;
- No site specific information is contained in the SPD;
- Electric vehicles and EV Charging Points;
- Car Parking Standards;
- Garage provision; and
- Viability implications.

Conclusions following Consultation

Taking all the comments received, a final version of all four SPDs have been prepared and will be reported to Cabinet for adoption.

Appendix A: Table of Changes for the draft Design SPD

Original Page no. and Paragraph no.	Current Paragraph wording	New Page no. and Paragraph no.	Change (deleted text in strikethrough ; new text <u>underlined and bold</u> ; changes to diagrams, tables etc. described in <i>italic text</i>).
general	Square checkbox	-	<i>Replaced with abc numbering for ease of referencing</i>
Page 1, caption	Heald Farm Court, Newton-le-Willows	Page 2, cover caption	Heald Farm Court, Newton-le-Willows Warburton Hey, Rainhill
Page 3, Contents	Residential Parking Standards	-	Residential Parking Standards Street <u>Hierarchy</u>
Page 5, Paragraph 1.1		-	Supplementary Planning Documents (SPDs) are documents that add detail to policies contained in a Local Plan. <u>They do not add new planning policy or unnecessary financial burdens.</u>
Page 5, Paragraph 1.1		-	<ul style="list-style-type: none"> • <u>Setting out a structured process for design irrespective of the complexity of a proposed development.</u> • <u>Ensuring that communities are engaged in the process at the appropriate time.</u>
Page 6, Paragraph 1.2	This document provides further guidance and interpretation on how a high standard of design can be met, and supplements the Local Plan's policies covering high quality design and measures to adapt to climate change.	-	<u>The Local Plan and the SPD set out 'a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.'</u> (National Planning Policy Framework Paragraph 132)
Page 6, Paragraph 1.2	high quality development for a well-designed environment	Page 6, Paragraph 1.2, Planning Policy	high quality development for and a well-designed environment
Page 7, Paragraph 1.2	the NPPF emphasises how the objective of achieving 'beauty' in design should be a key objective.	-	the NPPF emphasises how the objective of achieving 'beauty' in design should be a key objective.
Page 7, Paragraph 1.2	Paragraph 134	-	Paragraph 134 <u>9</u>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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Page 7, Paragraph 1.2	Paragraph 130, f	-	Paragraph 130 5 , f
Page 9, NMDC	-	-	<u>Following the adoption of the Design SPD the Council will look to develop design codes, potentially at Borough, locality, site level or topic-based as appropriate.</u>
Page 9, NMDC	Where a developer intends to prepare a design code for a particular scheme, the scope and content should be agreed with the Council.	-	Where a developer intends to prepare a design code for a particular scheme , the scope and content should be agreed with the Council.
Page 11, Paragraph 1.3	These can be agreed with the Council's planning service at the outset of the design process.	-	These can be agreed with the Council's planning service at the outset of the design process. <u>These should be agreed with the Councils Planning Service particularly in the case of major developments</u>
Page 17, Links Sidebar	-	-	<u>NPPF Section 12 references the importance of community engagement relative to design issues.</u>
Page 18, Figure 7	Design Stages	-	Design Stages- Tiers
Page 21		Page 21, Paragraph 1.13	<u>1.13 Viability</u> <u>It is the responsibility of the applicant to take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant.</u> <u>Where the principles set out in the SPD impact upon the viability and deliverability of a development, the applicant can argue a case for non-compliance, by preparing a viability appraisal to be shared with the Council.</u>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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			<u>This does not, however, exempt the developer from adopting the design process set out in the SPD in order to achieve the high quality design outcomes required by the NPPF and National Design Guide.”</u>
Page 23, Paragraph 2.1.1	-	Page 25, Paragraph 2.1.1	<u>f. St Helens has a unique heritage, based upon its history connected with the railways, mining, glass and other industries. Policy LPC11: Historic Environment sets out how the Council will seek to conserve the Borough’s historic environment and promote awareness of its shared heritage.</u>
Page 23, Paragraph 2.1.1	The Borough’s unique heritage, linking to its historic role in the glass, rail, coal mining and other industries, and its wide range of important natural environmental assets will be both recognised and valued.	Page 25, Paragraph 2.1.1	The Borough’s unique heritage, linking to its historic role in the glass, rail, coal mining and other industries, and its wide range of important natural environmental assets will be both recognised and valued.
Page 23, Paragraph 2.1.2	The following prompts consider the existing uses and activities that contribute to a sense of place.	Page 25, Paragraph 2.1.2 Text Box	<u>“A place is more complex and multifaceted than a building. it is a setting for a diverse range of uses and activities, and is experienced by many people in many different ways.”</u> <u>National Design Guide</u> <u>The following prompts consider existing uses and activities that may contribute to the sense of place. The applicant should consider how the proposed development will integrate with the existing patterns of use and character of place.</u>
Page 25, Paragraph 2.1.3	Understand who lives in the community currently and whether there is a dominant group characterized by age, ethnic background, occupation, etc.	Page 27, Paragraph 2.1.3	Understand who lives in the community currently and, whether there is a dominant group characterized by age, ethnic background, occupation, etc. <u>and how the development will benefit existing residents.</u>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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Page 27, Paragraph 2.2.1	-	Page 29, Paragraph 2.2.1	Reordering of bullets <u>The following techniques and issues for consideration may be appropriate to demonstrate a full understanding of the site's contextual relationship with its setting and locality.</u>
Page 29, Paragraph 2.2.2	-	Page 31, Paragraph 2.2.2	<u>The following techniques and issues for consideration may be appropriate to demonstrate a full understanding as to the character of the site and its locality.</u>
Page 29, Paragraph 2.2.2	Confirm whether the site is located within or near to a Conservation Area.	Page 31, Paragraph 2.2.2	Confirm whether the site is located within or near to a Conservation Area <u>and how the character should influence the approach to design of the proposed development.</u>
Page 29, Definitions Sidebar	Conservation Area An area of special architectural and historic interest, the character or appearance of which it is desirable to preserve or enhance.	Page 31, Definitions Sidebar	... <u>The Council has adopted a number of conservation area appraisals and management plans which can be viewed online.</u>
Page 31, Paragraph 2.2.3 Text Box	<i>“Well-designed places have a hierarchy of well-connected routes, such as boulevards, streets, roads, avenues, mews and courts. New developments help to reinforce or extend the movement network. For pedestrians and cyclists, direct links create good connections to public transport and promote active travel, particularly where they are along routes with low levels of vehicular traffic.”</i>	Page 33, Paragraph 2.2.3 Text Box	<i>“Well-designed places have a hierarchy of well-connected routes, such as boulevards, streets, roads, avenues, mews and courts. New developments help to reinforce or extend the movement network. For pedestrians and cyclists, direct links create good connections to public transport and promote active travel, particularly where they are along routes with low levels of vehicular traffic.”</i>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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Page 31, Paragraph 2.2.3	-	Page 33, Paragraph 2.2.3	<u>The following techniques and issues for consideration may be appropriate to demonstrate a full understanding of the movement networks that serve the development site.</u>
Page 31, Paragraph 2.2.3	Indicate the principal pedestrian and vehicular arrival points into the development site, and any existing nodal points within, or on the edge of, the site.	Page 33, Paragraph 2.2.3 or on the edge of, the site. <u>Consider how these points can enhance legibility for the site and integrate with adjoining locations.</u>
Page 33 sidebar	-	Page 35 sidebar	Link to <u>St Helens Strategic Flood Risk Assessment</u>
Page 34, Paragraph 2.3.1	In addition, Local Plan Policy LPA08: Green Infrastructure requires...	Page 35, Paragraph 2.3.1	In addition, Policy LPA08: Green Infrastructure requires...
Page 36, Paragraph 2.3.1	-	Page 37, paragraph 2.3.1	<u>d. Policy LPC12: Flood Risk and Water Management aims to ensure that development is directed to locations with the lowest risk of flooding and to locations with the least impact on water quality in accordance with the NPPF and the St Helens Strategic Flood Risk Assessment.</u>
Page 35, Links Sidebar	Bold Forest Park Area Action Plan provides guidance and policy covering infrastructure, ecological networks, heritage and enhancing landscape character.	Page 37 sidebar	Bold Forest Park Area Action Plan provides guidance and policy covering infrastructure, ecological networks, heritage and enhancing landscape character. <u>The Mersey Forest Plan</u> <u>Policy 4. Planting and Design</u> <u>Policy SH1. Urban areas, settlements and employment sites</u>
Page 39, Site & Context: Movement	-	Page 39 Text Box	<u>Patterns of movement, including walking and cycling, access to facilities, employment and servicing, parking and the convenience of public transport, are integral to well-designed</u>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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			<p><u>places. Their success is measured by how they contribute to the quality and character of the place, not only how well they function</u></p> <p><u>The following techniques and issues for consideration may be appropriate to demonstrate a full understanding of the patterns of movement on and around the development site.</u></p>
Page 43, Site & Context: Resources		Page 43 Text Box	<p><i><u>“Well-designed places and buildings conserve natural resources including land, water, energy and materials. Their design responds to the impacts of climate change by being energy efficient and minimising carbon emissions to meet net zero by 2050.”</u></i></p> <p style="text-align: right;"><i><u>National Design Guide</u></i></p> <p><u>The following techniques and issues for consideration may be appropriate to demonstrate a full understanding as to the importance of resourceful design in the context of new development.</u></p>
Page 42 Site & Context: Checklist	The checklist summarises the design variables in the preceding chapter. The applicant should determine which variables apply to a proposed application (and which of these may be suitable for design coding), undertake the required analysis and prepare an appropriate design response .	Page 44, Site & Context: Checklist	The checklist summarises the design variables in the preceding chapter. The applicant should determine which variables apply to a proposed application (and which of these may be suitable for design coding), undertake the required analysis and prepare an appropriate design response. <u>Variables suitable for design coding will be determined on a case by case basis, agreed with the local planning authority. More detail is set out in the SPD as to the potential for specific design issues to be the subject of coding.</u>
Page 45, Strategic intro	This level of design will result in the production of a Parameter Plan or a Masterplan.	Page 47, Strategic intro	This level of design Design Tier <u>Design Tier</u> will result in the production of a Parameter Plan <u>and/or an Illustrative</u> Masterplan.

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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Page 49, Paragraph 3.2, Strategic Identity	-	Page 51, Paragraph 3.2.1	<p>Re-Ordering of bullets.</p> <p>Demonstrate how the development is integrated with adjoining townscape <u>In respect of form, relative scale, proportion and elevation.</u></p> <p>Development should front onto the open landscape, <u>open space and highways</u> to avoid prominent backs of buildings.</p>
Page 51, Paragraph 3.2.1	Prepare visualisations of the development from significant viewpoints and important 'gateway' locations.	Page 53, Paragraph 3.2.1	Prepare <u>illustrative</u> visualisations of the development from significant viewpoints and important 'gateway' locations.
Page 53, Paragraph 3.2.1	The site layout should connect into the pattern of surrounding development.	Page 55, Paragraph 3.2.1	The <u>illustrative</u> site layout should connect into the pattern of surrounding development.
Page 53, Paragraph 3.2.1	Prepare design strategies for each of the principal pedestrian and vehicular arrival points into the development site	Page 55, Paragraph 3.2.1	Prepare <u>illustrative</u> design strategies for each of the principal pedestrian and vehicular arrival points into the development site
Page 53, Paragraph 3.2.2	Active frontages should predominate. Front doors and living room windows create activity and sense of security in the street. In urban developments, small commercial units or duplex apartments can be 'wrapped' around larger retail units or car parking. Offices and reception areas can activate factory units.	Page 55, Paragraph 3.2.2	<p>Active frontages should predominate. Front doors and living room windows create activity and sense of security in the street. In urban developments, small commercial units or duplex apartments can be 'wrapped' around larger retail units or car parking. Offices and reception areas can activate factory units. <u>In the case of industrial or employment based developments, the office elements should be placed close to public spaces and highways to promote active frontage.</u></p> <p><u>Landscaping should be an integral element in design proposals. Development should generally sit within a landscape setting, requiring incorporation of open space and tree planting. Large</u></p>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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			<u>areas of parking should be well subdivided by landscaping and service areas well screened and where possible sited away from street frontages. See also 'Nature' & 'Movement' themes.</u>
Page 55, Paragraph 3.2.3	-	Page 57, Paragraph 3.2.3	<u>The following prompts may be appropriate to demonstrate a full understanding of legibility.</u>
Page 57, Paragraph 3.3.1	-	Page 59, Paragraph 3.3.1	<p>Bullet ordering of f,g,h</p> <p><u>Nature contributes to the character of a place and to people's quality of life. It is a critical component of well-designed places. Natural features should be integrated into well-designed development. They include natural and designed landscapes, high quality public open spaces, street trees, and other trees, grass, planting and water.</u></p> <p><u>The following prompts may be appropriate to demonstrate a full understanding of nature and landscape.</u></p>
Page 61, Strategic Movement	-	Page 63, Strategic Movement	<u>The following prompts may be appropriate to demonstrate a full understanding of movement at the Strategic Design Tier.</u>
Page 63, Paragraph 3.4.3	-	Page 65, Paragraph 3.4.3	Bullet ordering
Page 63, Links Sidebar	-	Page 65, Links Sidebar	<u>Active Design Creating Active Environments Through Planning and Design. Sport England.</u>
Page 65, Paragraph 3.4.3	In residential schemes, parking should be predominantly at the side of dwellings or in secure and well-overlooked parking courts. Driveways should not form the whole of a building's frontage.	Page 67, Paragraph 3.4.3	In residential schemes, parking should be predominantly at the side of dwellings or in secure and well-overlooked parking courts. Driveways should not form the whole of a building's frontage. The

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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	The side of property parking should be protected from extensions that would force additional on-street parking to occur in replacement.		side of property parking should be protected from extensions that would force additional on-street parking to occur in replacement.
Page 67, Strategic Resources	-	Page 69, Strategic Resources	<p><u>The following prompts may be appropriate to demonstrate a full understanding of movement at the Strategic Design Tier.</u></p> <p>Consider the building's form factor. A compact building form minimises the heat loss envelope in relation to the building's volume. Grouping buildings together minimises thermal loss; apartments, terraces and semi-detached dwellings all share party walls, reducing heat loss.</p>
Page 67, Paragraph 3.5.1	Proposed dwellings should have front or back walls facing south and within (max) 45 degrees of an east-west axis.	Page 69, Paragraph 3.5.1	Proposed dwellings should, <u>as far as reasonably practical</u> , have front or back walls facing south and within (max) 45 degrees of an east-west axis.
Page 67, Paragraph 3.5.2	Highlight proposed locations for substations and a strategy for integrating enclosures into the wider design.	Page 69, Paragraph 3.5.2	Highlight proposed locations for substations <u>& pumping stations</u> , and a strategy <u>strategies</u> for integrating enclosures into the wider design.
Page 68, Strategic Checklist	The checklist summarises the design variables in the preceding chapter. The applicant should determine which variables apply to a proposed application (and which of these may be suitable for design coding), undertake the required analysis and prepare an appropriate design response .	Page 70, 3.6 Strategic Checklist	The checklist summarises the design variables in the preceding chapter. The applicant should determine which variables apply to a proposed application (and which of these may be suitable for design coding), undertake the required analysis and prepare an appropriate design response. <u>Variables suitable for design coding will be determined on a case by case basis, agreed with the local planning authority. More detail is set out in the SPD as to the potential for specific design issues to be the subject of coding.</u>

ST HELENS BOROUGH COUNCIL
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			Introduction of Paragraph Ref Column.
Page 71, Neighbourhood, Introduction	may still have may have major	Page 73, 4.0 Neighbourhood Design 5ier	may still have may have major <u>This Tier is likely to be relevant to a full application or a reserved matters application to an outline scheme (or part thereof).</u>
Page 73, Neighbourhood Community	-	Page 75, Neighbourhood Community Text Box	The form and layout of a development has a relationship with the uses and activities it accommodates.
Page 73, Neighbourhood Community	-	Page 75, Neighbourhood Community	<u>The following prompts may be appropriate to strengthening or creating community through development at the Strategic Design Tier.</u>
Page 75, Paragraph 4.1.3	Affordable dwellings should be ‘pepper potted’ throughout the site rather than being concentrated in a particular part of the site.	Page 77, Paragraph 4.1.3	Affordable dwellings should be evenly distributed throughout the site rather than being concentrated in a particular part of the site. <u>This does not preclude limited grouping of dwellings for functional or management purposes.</u>
Page 79, Paragraph 4.2.3	The Council will seek to make use of planning conditions and Section 106 Agreements (S106) for the inclusion of public art in new developments.	Page 81, Paragraph 4.2.3	The Council will seek to make use of planning conditions and Section 106 Agreements (S106) for the inclusion of public art in new <u>large or prominent gateway</u> developments.
Page 81, Paragraph 4.2.4	Gardens for apartment buildings should provide at least 20m ² for each flat. Bin stores and clothes-drying areas should not be included in this space. Strips of land to the side and front	Page 83, Paragraph 4.2.4	Gardens for apartment buildings should provide at least 20m ² for each flat in each block . <u>Less provision may be appropriate in higher density central and town centre locations and in locations with good access to open space.</u> Bin stores and clothes-drying areas should not be included in this space. Strips of land to

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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	required for streetscene and amenity reasons will not be counted as part of the garden area.		the side and front required for streetscene and amenity reasons will not be counted as part of the garden area.
Page 85, Neighbourhood Nature		Page 87, Neighbourhood Nature	<u>The following prompts may be appropriate to demonstrate a full understanding of nature and landscape at the Neighbourhood Design Tier.</u>
Page 85, Paragraph 4.3.2	Specify types of street tree and demonstrate that they have the room to mature without impacting neighbouring buildings.	Page 87, Paragraph 4.3.2	Specify types of street tree and demonstrate that they have the room to mature without impacting neighbouring buildings <u>or utilities.</u>
Page 91, Paragraph 4.4.5	Car parking provision must be designed to minimise its visual impact in the street scene, through appropriate siting and screening away from public view.	Page 93, Paragraph 4.4.4	Car parking provision must be designed to minimise its visual impact in the street scene, through appropriate siting and screening-away from public view.
Page 91, Paragraph 4.4.5	-	Page 93, Paragraph 4.4.4	<u>The side of property parking should be protected from extensions that would force additional on-street parking to occur in replacement.</u>
Page 91, Paragraph 4.4.5	This maintains good surveillance from properties and avoids the dominance of vehicles in the street frontage.	Page 93, Paragraph 4.4.4	This maintains good surveillance from properties. Where frontage parking is proposed this should not dominate the street frontage.
Page 93, Neighbourhood: Resources	-	Page 95, Neighbourhood: Resources	<u>The following prompts may be appropriate to demonstrate a full understanding of resources at the Neighbourhood Design Tier.</u>
Page 94, 4.6 Neighbourhood: Checklist	The checklist summarises the design variables in the preceding chapter. The applicant should determine which variables apply to a proposed application (and which of these may be suitable	Page 96, 4.6 Neighbourhood: Checklist	The checklist summarises the design variables in the preceding chapter. The applicant should determine which variables apply to a proposed application (and which of these may be suitable for design coding), undertake the required analysis and prepare an appropriate

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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	for design coding), undertake the required analysis and prepare an appropriate design response .		design response. <u>Variables suitable for design coding will be determined on a case by case basis, agreed with the local planning authority. More detail is set out in the SPD as to the potential for specific design issues to be the subject of coding.</u> Introduction of Paragraph Ref Column.
Page 99, Paragraph 5.1.1	Applicants must provide a schedule setting out internal floor areas for each dwelling type. Where a proposed dwelling is below the NDSS the applicant should provide a justification of why they cannot be met.	Page 101, Paragraph 5.1.1	Applicants must provide a schedule setting out internal floor areas for each dwelling type. Where a proposed dwelling is below the NDSS the applicant should provide a justification of why they cannot be met.
Page 101, Streets & Buildings: Identity	The Streets & Buildings Design Tier involves the resolution of detailed design matters for a street within a new development or development within an existing street.	Page 103, Streets & Buildings: Identity	<u>The following prompts may be appropriate to demonstrate a full understanding of identity at the Streets & Buildings Design Tier.</u>
Page 105, Paragraph 5.2.3	They should be set back within the elevation to provide shelter from the elements and a transition from pavement to building interior. Front doors should have a vision panel.	Page 107, Paragraph 5.2.3	They should be set back within the elevation, <u>or have a porch or canopy</u> , to provide shelter from the elements and a transition from pavement to building interior. Front doors should have a vision panel.
Page 107, Paragraph 5.2.4	High close-boarded fences should not be used in prominent locations.	Page 109, Paragraph 5.2.4	High close boarded fences should not be used in locations that project into or enclose the street scene. Spaces that require enclosure and meet the street scene should be demarcated by masonry walling, as appropriate.
Page 111, Paragraph 5.3.1	-	Page 113, Paragraph 5.3.1	<u>h. SuDS should be treated as a design opportunity, integrated into the wider landscape design.</u>

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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Page 115, Paragraph 5.4.1	Detailed design requirements will be set out in the revised St Helens Street Design Guide.	Page 117, Paragraph 5.4.1	Detailed design requirements will be set out in the <u>forthcoming</u> , revised St Helens Street Design Guide.
Page 117: Streets and Buildings: Resources		Page 119: Streets and Buildings: Resources	<u>The following prompts may be appropriate to demonstrate a full understanding of identity at the Streets & Buildings Design Tier.</u>
Page 117, Paragraph 5.5.1	Glazing to all habitable rooms should not be less than 20 per cent of the internal floor area of the room. Habitable rooms should benefit from natural light. Living areas should benefit from direct sunlight at some point during the day.	Page 119, Paragraph 5.5.1	Glazing to all habitable rooms should not be less than 20 per cent of the internal floor area of the room. Habitable rooms should benefit from natural light. Living areas should benefit from direct sunlight at some point during the day.
Page 118, Streets & Buildings Checklist	The checklist summarises the design variables in the preceding chapter. The applicant should determine which variables apply to a proposed application (and which of these may be suitable for design coding), undertake the required analysis and prepare an appropriate design response .	Page 120, Streets & Buildings Checklist	The checklist summarises the design variables in the preceding chapter. The applicant should determine which variables apply to a proposed application (and which of these may be suitable for design coding), undertake the required analysis and prepare an appropriate design response. <u>Variables suitable for design coding will be determined on a case by case basis, agreed with the local planning authority. More detail is set out in the SPD as to the potential for specific design issues to be the subject of coding.</u> Introduction of Paragraph Ref Column.
Page 125, A1.3	As this type of development will essentially result in a dwelling within the rear garden of an existing dwelling will often result in a site, which is cramped and overdeveloped. The development will also result in a poor outlook for the occupants of the new dwelling.	Page 127, A1.3	As <u>This</u> type of development will essentially result in a dwelling within the rear garden of an existing dwelling will often result in <u>and</u> a site which is cramped and overdeveloped. The development will also result in a poor outlook for the occupants of the new dwelling.

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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Page 151, A.4. Detailed Guidance		Page 152, A.4, Further Reading Nature & Landscape	Sport England. Active Design. May 2023.
Page 151, A.4 Further Reading Nature & Landscape	-	Page 153, A.4, Further Reading Nature & Landscape	<p>National Standards for Sustainable Drainage. https://www.susdrain.org/</p> <p>Construction Industry Research and Information Association. The SuDS Manual. CIRIA. 2015.</p> <p>St Helens Council Land Drainage Byelaws</p>

Appendix B: Table of Changes for the draft Developer Contributions SPD

Original Page no. and Paragraph no.	Current Paragraph wording	New Page no. and Paragraph no.	Change (deleted text in strikethrough; new text <u>underlined and bold</u> ; changes to diagrams, tables etc. described in <i>italic</i> text).
Page 3, Contents page		-	Chapter 3 – addition of sub-heading <u>Cross-Boundary Developments</u>
Page 5, paragraph 1.1an adopted Local Plan. SPDs are.....	-an adopted Local Plan. <u>SPDs cannot introduce new planning policies, nor can they add unnecessary financial burdens on development.</u> SPDs are.....
Page14, Paragraph 2.5	Paragraph 63 of the NPPF states that where.....	-	Paragraph 63 4 of the NPPF states that where
Page 19, Paragraph 2.22	Biodiversity Net Gain (BNG) is a concept introduced by the Environment Act and will become a statutory obligation from November 2023 onwards and is a way to contribute to the recovery of nature while developing land. It will make sure the habitat for wildlife is in a better state than it was before development. National and local policy expects the BNG to be achieved on site. The Council requires that this is achieved through the use of the current DEFRA Biodiversity Net Gain Metric. This should establish the baseline measurement for biodiversity for a site (measured in habitat units), the impact of the development in terms of loss and the impact of the mitigation measures. Further information will be set out in the future Nature Conservation SPD and is also clarified in the Environment Act 2021, and upcoming legislation which is expected early 2024.	-	Biodiversity Net Gain (BNG) is a concept introduced by the Environment Act and will become a statutory obligation from <u>the 12 February 2024 (for major applications and April 2024 for small sites i.e. (0-9 units) unless exempt.</u> November 2023 onwards and It is a way to contribute to the recovery of nature while developing land. It will make sure the habitat for wildlife is in a better state than it was before development. National and local policy expects the BNG to be achieved on site. The Council requires that this is achieved through the use of the <u>Statutory DEFRA Biodiversity Metrics</u> current DEFRA Biodiversity Net Gain Metric. This should establish the baseline measurement for biodiversity for a site <u>and the effect of both on and offsite habitat and landscape proposals</u> (measured in habitat units), the impact of the development in terms of loss and the impact of the mitigation measures <u>should be fully considered and be in accordance with the Biodiversity Gain Regulations 2024 and its associated Statutory Instruments.</u> Further information will be set out in the future Nature Conservation SPD, and <u>will include further information on local requirements relating to Biodiversity Net Gain</u> is also clarified in the

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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			Environment Act 2021, and upcoming legislation which is expected early 2024.
Page 20, Paragraph 2.26	Planning obligations relating to biodiversity will be sought from development where the Council is satisfied that off-site provision (or a financial contribution in lieu of off-site provision) would deliver a better outcome and/or support strategic proposals set out in the IDP. Where contributions are required, developers must provide a financial contribution to secure the long-term management and maintenance of on or off-site habitat enhancement or creation.	-	Planning obligations <u>will be in accordance with the requirements Environment Act 2021 and Biodiversity Gain Regulations 2024 and its associated Statutory Instruments. Where this involves relating to biodiversity will be sought from development where the Council is satisfied that off-site provision <u>or significant on site provision of Biodiversity Net Gain this will be secured through Section 106 agreement and appropriate conditions. (or a financial contribution in lieu of off-site provision) would deliver a better outcome and/or support strategic proposals set out in the IDP. Where contributions are required, developers will need to</u> must provide <u>information under the Biodiversity Net Gain condition requiring a Biodiversity Net Gain Plan, as well as a Habitat Monitoring and Management Plan.</u> a financial contribution to secure the long-term management and maintenance of on or off-site habitat enhancement or creation.</u>
Page 20, Paragraph 2.27	The Council will work with partner organisations, to ensure that any commuted sum is used appropriately to ensure sufficient habitat creation is delivered in a quantifiable way to address the loss of biodiversity resulting from the consented development. The Council will utilise the funding to create habitat that delivers best value for biodiversity. In some circumstances this may involve the creation of smaller areas of habitat subject to more costly long-term management or alternatively funding may be utilised to deliver larger areas of habitat with relatively limited management input. Please refer to the Nature Conservation SPD for further details.	-	<u>Over time, the Council will work with partner organisations, is looking to support the development of off-site biodiversity net gain opportunities with a range of partner organisations.</u> ensure that any commuted sum is used appropriately to ensure sufficient habitat creation is delivered in a quantifiable way to address the loss of biodiversity resulting from the consented development. <u>As these opportunities become available, the Council will help to promote any availability of off-site habitat units, particularly through the pre-application process. Developers will also need to explore off site opportunities for biodiversity net gain and only resort to the use of Natural England Statutory credits if they can evidence that this is a position of last resort.</u> utilise the funding to create habitat that delivers best value for biodiversity. In some circumstances this may involve the creation of smaller areas of habitat subject to more costly long-term management or alternatively

ST HELENS BOROUGH COUNCIL
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			funding may be utilised to deliver larger areas of habitat with relatively limited management input. Please refer to the Nature Conservation SPD for further details.
Page 20, Purple text box	Where it is not possible to achieve adequate on-site mitigation or compensation, a financial contribution will be sought for off-site measures to adequately offset the impact of the development.	-	Where it is not possible to achieve adequate on-site mitigation or compensation, a financial contribution will be sought for off-site <u>in line with the mitigation hierarchy approach. The measures considered must also be in accordance with the requirements of the Environment Act 2021, The Biodiversity Gain Regulations 2024, and its associated Statutory Instruments and Guidance. It should also seek to take opportunities to use local off-site habitat unit provision as this becomes available.</u> measures to adequately offset the impact of the development.
Page 24, Paragraph 2.37	In addition, the NPPF, paragraph 190. States.....	Page 23, Paragraph 2.37	In addition, the NPPF, paragraph 190- <u>6</u> , States.....
Page 24, Paragraph 2.42 In this instance a new school may be required to address the shortfall of places, potential required area of land required is shown in Appendix 2. Therefore, for the very largest development site(s) it is anticipated	Page 25, Paragraph 2.42 In this instance a new school may be required to address the shortfall of places., potential required area of land required is shown in Appendix 2 . Therefore, for the very largest development site(s) it is anticipated
Page 26, Paragraph 2.44		-	Delete Footnote 13, as this is no-longer required in the method of calculation.
Page 26, Paragraph 2.46	There is currently no standard capacity assessment applicable to special schools and other types of non-mainstream education, as their ability to accommodate pupil depends on the needs of each child. However, an increase in housing will inevitably lead to an increase in special educational needs/special educational needs and disabilities	-	<u>The DfE now provide a Special School Net Capacity Assessment tool for Local Authorities to use, as historically</u> there is currently was no standard capacity assessment applicable to special schools and other types of non-mainstream education, as their ability to accommodate pupil depends on the needs of each child. However, <u>It is recognised that</u> an increase in housing will inevitably lead to an increase in special educational needs/special educational needs and disabilities

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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Page 28, Paragraph 2.53	Education contribution funding will secure the capital costs of accommodating school pupils. This could fund the capital build, access and associated site curtilage costs for an expansion or new build. In line with DfE guidance, developer contributions could also be used to provide temporary solutions to meet education needs where it may not be possible to open a permanent new school at the point of need. However, the permanent provision of additional school places will still have to be funded to mitigate the impact of a development.	-	Education contribution funding will secure the capital costs of accommodating school pupils. This could fund the capital build, access and associated site curtilage costs for an expansion or new build. In line with DfE guidance, developer contributions could also be used to provide temporary solutions to meet education needs where it may not be possible to open a permanent new school at the point of need. <u>When a permanent new school is delivered (or the relevant financial contribution is received), no further contributions to temporary provision should be required.</u> However, the permanent provision of additional school places will still have to be funded to mitigate the impact of a development.
Page 28, Blue Text Box	The team will then assess if the proposed development will lead to a shortfall or additional need for school places, including sixth form and SEN/SEND educational facilities.	-	The team will then assess if the proposed development will lead to a shortfall or additional need for school places, including <u>early years,</u> sixth form and SEN/SEND educational facilities.
Page 28, Footnote 16		Page 28, Footnote 15	Hyperlink has been updated, as previous one had been updated <u>2023 2024 Mainstream Application Form.pdf (sthelens.gov.uk)</u>
Page 29, Footnote 17 The consultation period is currently underway on the process of a SAB, along with amendments to existing guidance, funding opportunities and existing rights for connections.	Page 29/30, Footnote 16 The consultation period is currently underway on the process of a SAB, along with amendments to existing guidance, funding opportunities and existing rights for connections. <u>Any changes in legislation will therefore be picked up in a separate SuDS Guidance document.</u>
Page 30, Paragraph 2.64	On-site and off-site infrastructure which is required to alleviate the risk of flooding and reduce impacts on drainage infrastructure will normally form part of the details submitted and agreed through the planning application process, via a SuDS Management Plan. However, the on-going maintenance of such infrastructure may	Page 30, Paragraph 2.66	On-site and off-site infrastructure which is required to alleviate the risk of flooding and reduce impacts on drainage infrastructure will normally form part of the details submitted and agreed through the planning application process, via a SuDS Management Plan. However, the on-going <u>future management and</u> maintenance of such infrastructure may need to be secured through a s106

ST HELENS BOROUGH COUNCIL
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	need to be secured through a s106 Agreement or potentially commuted sums.		Agreement or potentially commuted sums, <u>unless a management company has been appointed by the developer.</u>
Page 32, Paragraph 2.66	The NPPF (paragraph 92) requires that strategic.....	Page 32, Paragraph 2.68	The NPPF (paragraph 92 <u>7</u>) requires that strategic.....
Page 34, Paragraph 2.73	As a rule, the Council will consult with the ICB on major planning applications of 200 dwellings or more, and applications with particular health/ care implications, such as care homes and extra care facilities.	Page 33, Paragraph 2.75	As a rule, the Council will consult with the ICB on major housing planning applications of 200 dwellings or more , and applications with particular health/ care implications, such as care homes and extra care facilities.
Page 34, Paragraph 2.74	There are two elements of developer contributions relating to health provision. Firstly, to mitigate the impact of development on the existing level of health provision in the area local to the site; and secondly where there is the need to secure a new health facility as part of a large-scale development of a strategic nature.	Page 33, Paragraph 2.76	There are two elements of developer contributions relating to health provision. <u>Planning obligations relating to health provision are usually sought in one of two ways.</u> Firstly, to mitigate the impact of development on the existing level of health provision in the area local to the site <u>through extension, refurbishment and/or reconfiguration of existing facilities.</u> ; and s <u>Secondly</u> , where there is the need to secure a new health facility as part of large-scale development of a strategic nature, <u>or where a number of developments coming forward in an area collectively require the delivery of a new facility.</u>
Page 34, Paragraph 2.76	Strategic Development Requirements Where a development proposal is of such magnitude that it would result in an increase in population which cannot be accommodated by existing health provision and is of a level that it would justify the delivery of a health centre, the Council will seek to deliver a new facility as part of the overall development proposal.	Page 33, Paragraph 2.78	<u>Larger and</u> Strategic Development Requirements <u>An assessment will first be made as to whether existing facilities in the surrounding area can accommodate the increase in patients arising from the development.</u> Where a development proposal is of such magnitude that it would result in an increase in population that cannot be accommodated by existing health provision and is of a level that it would justify the delivery of a health centre, the Council will seek to deliver a new facility as part of the overall development proposal. <u>developer contributions will be sought. This may include works such as refurbishment, reconfiguration or an extension to existing health facilities, or in</u>

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			<u>some instances may justify the delivery of a new health facility. The Council will seek to secure the land at zero cost and then contributions towards the delivery of a health centre.</u>
Page 34, Green Text Box	The St Helens ICB will be consulted on proposals for 200 or more dwellings.	Page 33, Green Text Box	The St Helens ICB will be consulted on proposals for 200 or more dwellings. <u>major housing planning applications.</u>
Page 35, Paragraph 2.77	The mechanism for delivering a new health centre will need to be agreed with the Council and its NHS Partners as part of the pre-application process, taking into account development viability.	Page 33, Paragraph 2.79	The mechanism for delivering a new health centre will need to be agreed with the Council and its NHS Partners as part of the pre-application process, taking into account development viability.
Page 37, Paragraph 2.92 generated by housing development, contributions will be sought towards the enhancement of existing facilities or provision of new facilities in the area to address this shortfall,	Page 38, Paragraph 2.94generated by housing development, <u>a proportionate developer</u> contributions will be sought towards the enhancement of <u>these</u> existing facilities or provision of new facilities in the <u>area to address the new demand (and not to address any existing</u> is shortfall),
Page 41, Paragraph 2.101	Paragraph 92, of the NPPF states that planning.....	Page 42, Paragraph 2.103	Paragraph 92 <u>7</u> , of the NPPF states that planning.....
Page 42, Paragraph 2.109	The Council provides co-ordinated advice on development proposals through its consultation response on planning applications. This may specify requirements for measures to mitigate the transport and other impacts of the development, which can be secured through legal agreements.	Page 43, Paragraph 2.111	The Council provides co-ordinated advice on development proposals through its consultation response on planning applications. This may specify requirements for measures to mitigate the transport and other impacts of the development, which can be secured through legal agreements. <u>For all proposals, applicants are encouraged to engage with the Council at the pre-application stage, and National Highways when proposals may impact the Strategic Road Network.</u>
Paragraphs 2.55 – 2.115		-	Renumbered paragraphs to account for duplication

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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Page 48 (Chapter 3)		Page 48 (Chapter 3) Paragraph 3.13	<u>Cross-Boundary Developments</u> <u>3.13 Where an application site lies immediately adjacent to or partially within a neighbouring local authority area, St Helens Borough Council will work closely with the relevant authority to ensure that infrastructure provided meets the needs of all authorities affected by the development.</u>
Paragraphs 3.13 to 3.31		-	Renumbered paragraphs to account for additional paragraph.
Appendix 2		-	Appendix to be deleted as it is not considered necessary for the document. Reference is made within the document (paragraph 2.42 and footnote 11) that new schools will be built in line with guidance contained in Building Bulletin 103 or any subsequent relevant updates. And the size of land required for a new school would need to comply with the DfE guidance

Appendix C: Table of Changes for the draft Open Space Provision and Enhancement SPD

Original Page no. and Paragraph no.	Current Paragraph wording	New Page no. and Paragraph no.	Change (deleted text in strikethrough ; new text <u>underlined and bold</u> ; changes to diagrams, tables etc. described in <i>italic</i> text).																								
Page 4, paragraph 1.1an adopted Local Plan. SPDs are.....	-an adopted Local Plan. <u>SPDs cannot introduce new planning policies, nor can they add unnecessary financial burdens on development.</u> SPDs are.....																								
Page 7, paragraph 2.7 be reflected in proposals (NPPF paragraph 98).	- be reflected in proposals (NPPF paragraph 98 <u>102</u>).																								
Page 12, paragraph 3.3	<ul style="list-style-type: none"> ▪ Meeting local needs - providing for a range of different open space, sport and recreation facilities where required, to meet the needs generated by the development in the context of the existing local provision. 	-	Meeting local needs - providing for a range of different open space, sport and recreation facilities where required, to meet the needs generated by the development in the context of the existing local provision. <u>This can also include improvements to existing open spaces, for example improving habitats, updating sports & play equipment and improving the infrastructure of existing parks and open spaces to make them more accessible.</u>																								
Page 15, paragraph 4.3	All play equipment will be required to have a 25-year warranty.	-	All play equipment will be required to have a 25-year warranty <u>and comply with the relevant regulations current at the time of installation, including a full Installation Certificate on completion.</u>																								
Page 17, Table 2: Occupancy Rates for New Developments	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #00AEEF; color: white;"> <th style="text-align: center;">Number of Bedrooms</th> <th style="text-align: center;">Estimated Occupancy</th> </tr> </thead> <tbody> <tr><td style="text-align: center;">1</td><td style="text-align: center;">2 persons</td></tr> <tr><td style="text-align: center;">2</td><td style="text-align: center;">4 persons</td></tr> <tr><td style="text-align: center;">3</td><td style="text-align: center;">5 persons</td></tr> <tr><td style="text-align: center;">4</td><td style="text-align: center;">6 persons</td></tr> <tr><td style="text-align: center;">5 +</td><td style="text-align: center;">7 persons</td></tr> </tbody> </table>	Number of Bedrooms	Estimated Occupancy	1	2 persons	2	4 persons	3	5 persons	4	6 persons	5 +	7 persons	-	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #00AEEF; color: white;"> <th style="text-align: center;">Number of Bedrooms</th> <th style="text-align: center;">Estimated Occupancy</th> </tr> </thead> <tbody> <tr><td style="text-align: center;">1</td><td style="text-align: center;">2 persons</td></tr> <tr><td style="text-align: center;">2</td><td style="text-align: center;">4 <u>3</u> persons</td></tr> <tr><td style="text-align: center;">3</td><td style="text-align: center;">5 <u>4</u> persons</td></tr> <tr><td style="text-align: center;">4</td><td style="text-align: center;">6 <u>5</u> persons</td></tr> <tr><td style="text-align: center;">5 +</td><td style="text-align: center;">7 <u>6</u> persons</td></tr> </tbody> </table>	Number of Bedrooms	Estimated Occupancy	1	2 persons	2	4 <u>3</u> persons	3	5 <u>4</u> persons	4	6 <u>5</u> persons	5 +	7 <u>6</u> persons
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ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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Page 17, footnote 6	If the house type is unknown, then a standard figure of 50m ² will be assumed (based on a 3-bed dwelling provision).	-	If the house type is unknown, then a standard figure of 540 m ² will be assumed (based on a 3-bed dwelling provision).																																										
Page 22, paragraph 6.5calculate the number of potential new residents as 245 (see Table 5) and	-calculate the number of potential new residents as 245 <u>195</u> (see Table 5) and																																										
Page 22, Table 5: Estimated occupancy for a scheme of 50 dwellings	<table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr style="background-color: #9575CD; color: white;"> <th>No. of Bedrooms</th> <th>Estimated Occupancy</th> <th>Number of dwellings</th> </tr> </thead> <tbody> <tr><td>1-bed</td><td>2</td><td>0</td></tr> <tr><td>2-bed</td><td>4</td><td>15</td></tr> <tr><td>3-bed</td><td>5</td><td>25</td></tr> <tr><td>4-bed</td><td>6</td><td>10</td></tr> <tr><td colspan="2">Total number of dwellings</td><td>50</td></tr> <tr><td colspan="2">Total number of occupants</td><td>245</td></tr> </tbody> </table>	No. of Bedrooms	Estimated Occupancy	Number of dwellings	1-bed	2	0	2-bed	4	15	3-bed	5	25	4-bed	6	10	Total number of dwellings		50	Total number of occupants		245	-	<table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr style="background-color: #9575CD; color: white;"> <th>No. of Bedrooms</th> <th>Estimated Occupancy</th> <th>Number of dwellings</th> </tr> </thead> <tbody> <tr><td>1-bed</td><td>2</td><td>0</td></tr> <tr><td>2-bed</td><td>43</td><td>15</td></tr> <tr><td>3-bed</td><td>54</td><td>25</td></tr> <tr><td>4-bed</td><td>65</td><td>10</td></tr> <tr><td colspan="2">Total number of dwellings</td><td>50</td></tr> <tr><td colspan="2">Total number of occupants</td><td>245<u>195</u></td></tr> </tbody> </table>	No. of Bedrooms	Estimated Occupancy	Number of dwellings	1-bed	2	0	2-bed	4 3	15	3-bed	5 4	25	4-bed	6 5	10	Total number of dwellings		50	Total number of occupants		245 <u>195</u>
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Page 39, Appendix 4: Flow Chart – Process for determining Open Space provision, Stage 2	Determine the type of open space, and outdoor sport that may be required for the proposal site (see Table 1)	-	Determine the type of open space, (<u>including</u> and outdoor sport <u>provision at this stage</u>) that may be required for the proposal site (see Table 1)																																										
Page 39, Appendix 4: Flow Chart –	Use the amounts per occupant as set out in Tables 5 & 6, (based on a maximum occupancy rate)	-	Use the amounts per occupant as set out in Tables 5 & 6, (based on a maximum occupancy rate, <u>as set out in Table 2</u>)																																										

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Process for determining Open Space provision, Stage 3			
Page 40, Appendix 5: Worked example for 45 dwellings	Changes to the Estimated Occupancy rates (as set out above, Table 2) Total number of occupants 210	-	Changes to the Estimated Occupancy rates (as set out above, Table 2) Total number of occupants 210 <u>165</u>
Page 40, Appendix 5: Worked example for 45 dwellings, Stage 2	Quantity –population increase from this development is 210 new occupants and,.....	-	Quantity –population increase from this development is 210 <u>165</u> new occupants and,.....
Page 41, Appendix 5: Worked example for 45 dwellings, Stage 3	As the site would potentially have 210 new occupants, this would also facilitate.....	-	As the site would potentially have 210 <u>165</u> new occupants, this would also facilitate.....
Page 41, Appendix 5: Worked example for 45 dwellings, Stage 3	210 occupants x 10m ² = 2,100m ² amenity greenspace provision	-	210 <u>165</u> occupants x 10m ² = 2,100 <u>1,650</u> m ² amenity greenspace provision
Page 41, Appendix 5: Worked example for 45are multiplied by the number of proposed occupants (210) of the new.....	-are multiplied by the number of proposed occupants (210 <u>165</u>) of the new.....

ST HELENS BOROUGH COUNCIL
SUPPLEMENTARY PLANNING DOCUMENTS CONSULTATION STATEMENT (2024)

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dwelling, Stage 5			
Page 41, Appendix 5: Worked example for 45 dwellings, Stage 5(in this instance 10sq.m. per occupant, which would equate to 2,100sq.m.).	-(in this instance 10sq.m. per occupant, which would equate to 2,100 <u>1,650</u> sq.m.).
Page 42, Appendix 5: Worked example for 45 dwellings, Stage 5 calculation	Contribution for new provision	Maintenance Costs (x 25 year)	Total Cost
	Not required	Not required	£0
	Not required	Not required	£0
	£41.06 x 2100	£2.86 x 2100x 25	£236,376
	Not triggered	Not triggered	£0
	Not required	£17.47 x 210x 25	£91,717.50
	Total		£328,093.50
	Contribution for new provision	Maintenance Costs (x 25 year)	Total Cost
	Not required	Not required	£0
	Not required	Not required	£0
	£41.06 x 2100 1650	£2.86 x 2100 1650 x 25	£236,376 185,724
	Not triggered	Not triggered	£0
	Not required	£17.47 x 210 165 x 25	£91,717.50 72,063.75
	Total		£328,093.50 257,787.75
Page 43, Appendix 6: Worked example for 45 dwellings	Changes to the Estimated Occupancy rates (as set out above, Table 2) Total number of occupants 1,359	-	Changes to the Estimated Occupancy rates (as set out above, Table 2) Total number of occupants 1,359 <u>1,029</u>
Page 43, Appendix 6: Worked example for 45 dwellings, Stage 2	Quantity – population increase from this development is 1,359 new occupants and,.....	-	Quantity – population increase from this development is 1,359 <u>1,029</u> new occupants and,.....

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Page 43, Appendix 6: Worked example for 45 dwellings, Stage 3	1,359 occupants x 8m ² = 10,872m ² parks and gardens provision	-	1,359 <u>1,029</u> occupants x 8m ² = 10,872 <u>8,232</u> m ² parks and gardens provision																																										
Page 45, Appendix 6: Worked example for 45 dwellings, Stage 5, calculation	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #C00000; color: white;"> <th style="text-align: center;">Contribution for new provision</th> <th style="text-align: center;">Maintenance Costs (x 25 year)</th> <th style="text-align: center;">Total Cost</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">£49.09 x 10,872</td> <td style="text-align: center;">£2.96 x 10,872 x 25</td> <td style="text-align: center;">£1,338,234.48</td> </tr> <tr> <td style="text-align: center;">Not required (scheme is providing sufficient quantity in this case)</td> <td style="text-align: center;">Not required</td> <td style="text-align: center;">£0</td> </tr> <tr> <td style="text-align: center;">Not required provided within the scheme</td> <td style="text-align: center;">Not required</td> <td style="text-align: center;">£0</td> </tr> <tr> <td style="text-align: center;">Not required</td> <td style="text-align: center;">Not required</td> <td style="text-align: center;">£0</td> </tr> <tr> <td style="text-align: center;">£110,000 (contribution to MUGA)</td> <td style="text-align: center;">£17.47 x 1,329 x 25</td> <td style="text-align: center;">£690,440.75</td> </tr> <tr> <td style="text-align: center;">Total</td> <td></td> <td style="text-align: center;">£2,028,675.23</td> </tr> </tbody> </table>	Contribution for new provision	Maintenance Costs (x 25 year)	Total Cost	£49.09 x 10,872	£2.96 x 10,872 x 25	£1,338,234.48	Not required (scheme is providing sufficient quantity in this case)	Not required	£0	Not required provided within the scheme	Not required	£0	Not required	Not required	£0	£110,000 (contribution to MUGA)	£17.47 x 1,329 x 25	£690,440.75	Total		£2,028,675.23	-	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #C00000; color: white;"> <th style="text-align: center;">Contribution for new provision</th> <th style="text-align: center;">Maintenance Costs (x 25 year)</th> <th style="text-align: center;">Total Cost</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">£49.09 x 10,872 <u>8,232</u></td> <td style="text-align: center;">£2.96 x 10,872 <u>8,232</u> x 25</td> <td style="text-align: center;">£1,338,234.48 <u>1,013,276.88</u></td> </tr> <tr> <td style="text-align: center;">Not required (scheme is providing sufficient quantity in this case)</td> <td style="text-align: center;">Not required</td> <td style="text-align: center;">£0</td> </tr> <tr> <td style="text-align: center;">Not required provided within the scheme</td> <td style="text-align: center;">Not required</td> <td style="text-align: center;">£0</td> </tr> <tr> <td style="text-align: center;">Not required</td> <td style="text-align: center;">Not required</td> <td style="text-align: center;">£0</td> </tr> <tr> <td style="text-align: center;">£110,000 (contribution to MUGA)</td> <td style="text-align: center;">£17.47 x 1,329 <u>1,029</u> x 25</td> <td style="text-align: center;">£690,440.75 <u>559,415.75</u></td> </tr> <tr> <td style="text-align: center;">Total</td> <td></td> <td style="text-align: center;">£2,028,675.23 <u>1,572,692.63</u></td> </tr> </tbody> </table>	Contribution for new provision	Maintenance Costs (x 25 year)	Total Cost	£49.09 x 10,872 <u>8,232</u>	£2.96 x 10,872 <u>8,232</u> x 25	£ 1,338,234.48 <u>1,013,276.88</u>	Not required (scheme is providing sufficient quantity in this case)	Not required	£0	Not required provided within the scheme	Not required	£0	Not required	Not required	£0	£110,000 (contribution to MUGA)	£17.47 x 1,329 <u>1,029</u> x 25	£ 690,440.75 <u>559,415.75</u>	Total		£2,028,675.23 <u>1,572,692.63</u>
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Typology Definitions, Amenity greenspace			

Appendix D: Table of Changes for the draft Transport and Travel SPD

Original Page no. and Paragraph no.	Current Paragraph wording	New Page no. and Paragraph no.	Change (deleted text in strikethrough ; new text <u>underlined and bold</u> ; changes to diagrams, tables etc. described in <i>italic</i> text).
All document	All document	-	<i>The Transport and Travel SPD will be taken through InDesign to improve the design of the document and reflect the style used within the Design SPD for consistency.</i>
Page 5, Paragraph 1.4	This SPD should be used by developers and their consultants from the earliest stages of the planning process for development. “Development” in this instance refers to any scheme that requires planning permission be that a new development, a redevelopment of an existing building or a change of use.	-	This SPD should be used by developers and their consultants from the earliest stages of the planning process for development. “Development” in this instance refers to any scheme that requires planning permission be that a new development, a redevelopment of an existing building or a change of use. <u>It is the responsibility of the applicant to take into account any costs including their own profit expectations and risks and ensure that proposals for development are policy compliant. Where the principles set out in the SPD impact upon the viability and deliverability of a development, the applicant can argue a case for non-compliance, by preparing a viability appraisal to be shared with the Council. This does not, however, exempt the developer from adopting the process set out in this SPD</u>
Page 13, Paragraph 2.17	To assist in delivering a Preferred Future the Council will encourage applications to refer to the following TRICS and TfN guidance for further information: <ul style="list-style-type: none"> • TRICS Decide and Provide Guidance Note • Transport for the North Future Travel Scenarios 	-	To assist in delivering a Preferred Future the Council will encourage applications to refer to the following TRICS, DfT and TfN guidance for further information: <ul style="list-style-type: none"> • TRICS Decide and Provide Guidance Note • <u>DfT Circular 01/2022</u> • Transport for the North Future Travel Scenarios <p><i>Footnote to be added: ¹² <u>Strategic road network and the delivery of sustainable development - GOV.UK (www.gov.uk).</u></i></p>

ST HELENS BOROUGH COUNCIL
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Page 15, Paragraph 2.2	FAO Development Control Manager, Pre-application advice, Atlas House, 2 Corporation Street, St Helens, WA9 1LD	-	FAO Development Control Manager, Pre-application advice, Atlas House, <u>Place Services</u> 2 Corporation Street, <u>St Helens Borough Council</u> <u>PO Box 512</u> St Helens WA9 1LD <u>10 9JX</u>
Page 22, Paragraph 4.5	This SPD has been produced in accordance with Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the National Planning Policy Framework (MHCLG, 2021).	Page 21, Paragraph 4.5	This SPD has been produced in accordance with Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the National Planning Policy Framework (MHCLG, 2021) <u>DLUHC 2023</u> .
Page 24, Paragraph 4.14	<p>This SPD reinforces ‘Promoting Sustainable Transport’ and is also in alignment with paragraph 92, Chapter 8 of the NPPF, “Promoting Healthy and Safe Communities”, details that planning policies and decisions should aim to achieve healthy, inclusive, and safe places which allow for:</p> <ul style="list-style-type: none"> • <i>Social interaction through street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods.</i> • <i>Are safe and accessible with attractive, well-designed, clear, and legible pedestrian and cycle routes.</i> 	Page 23, Paragraph 4.14	<p>This SPD reinforces ‘Promoting Sustainable Transport’ and is also in alignment with paragraph 92<u>6</u>, Chapter 8 of the NPPF, “Promoting Healthy and Safe Communities”, details that planning policies and decisions should aim to achieve healthy, inclusive, and safe places which allow for that:</p> <ul style="list-style-type: none"> • <i>Social interaction through street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods.</i> • <i>Are safe and accessible with attractive, well-designed, clear, and legible pedestrian and cycle routes.</i> • <i>Enable and support healthy lifestyles with layouts that encourage walking and cycling.</i> <p><u>a) promote social interaction, including opportunities for meetings between people who might not otherwise come</u></p>

ST HELENS BOROUGH COUNCIL
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	<ul style="list-style-type: none"> <i>Enable and support healthy lifestyles with layouts that encourage walking and cycling.</i> 		<p><u>into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;</u></p> <p><u>b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of beautiful, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and</u></p> <p><u>c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.</u></p>
Page 36, Paragraph 5.19	The incorporation of Sustainable Drainage Systems (SUDS), in the design of streetscapes, new car parks, etc. should be considered where practical. This can help to prevent localised flooding associated with the urban drainage system and can also have additional benefits with regards to biodiversity, landscape / townscape character and visual amenity and recreation depending on the system installed. Careful design is required to reduce the impact of impermeable surfaces which may cause flash flooding; implementing SUDS	-	The incorporation of Sustainable Drainage Systems (SUDS), in the design of streetscapes, new car parks, etc. should be considered where practical. This can help to prevent localised flooding associated with the urban drainage system and can also have additional benefits with regards to biodiversity, landscape / townscape character and visual amenity and recreation depending on the system installed. Careful design is required to reduce the impact of impermeable surfaces which may cause flash flooding; implementing SUDS could help reduce impacts. Good design, green landscaping and planting can

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	could help reduce impacts. Good design, green landscaping and planting can		
Page 38, Paragraph 6.1	NPPF states that development which is not well designed should be refused, especially where it fails to reflect local design policies and government guidance, including applicable SPD's. A well-considered design process is fundamental to achieving a sustainable approach to access and connectivity.	-	NPPF <u>para 139</u> states that development which is not well designed should be refused, especially where it fails to reflect local design policies and government guidance, including applicable SPD's. A well-considered design process is fundamental to achieving a sustainable approach to access and connectivity.
Page 38, footnote 62	NPPF para. 134 source: https://www.gov.uk/guidance/design#planning-for-well-designed-places	Page 38, footnote 63	NPPF para. 134 source: https://www.gov.uk/guidance/design#planning-for-well-designed-places <u>National Planning Policy Framework (publishing.service.gov.uk)</u>
Page 57, Paragraph 8.29	With regards to the National Planning Policy Framework reference should be made to the entire chapter on Promoting Sustainable Transport. There is a tendency to focus solely on the test for severity (currently NPPF para 111); however, this misses the fact that whereas a scheme could be acceptable in terms of its wider impact, there are potential improvements in terms of layout and amenities to ensure that the proposal can be considered well-designed in accordance with the NPPF.	-	With regards to the National Planning Policy Framework reference should be made to the entire chapter on Promoting Sustainable Transport. There is a tendency to focus solely on the test for severity (currently NPPF para 111 <u>5</u>); however, this misses the fact that whereas a scheme could be acceptable in terms of its wider impact, there are potential improvements in terms of layout and amenities to ensure that the proposal can be considered well-designed in accordance with the NPPF.

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Page 65, Paragraph 8.65 A fall-back position can only be considered if there is a reasonable prospect of it being implemented if the current application is refused.		A fall-back position can only be considered if there is a reasonable prospect <u>possibility</u> of it being implemented if the current application is refused.																											
Page 65, Paragraph 8.86	The National Planning Policy Framework considers that “development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe” (NPPF para 111).	-	The National Planning Policy Framework considers that “development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe” (NPPF para 114 <u>5</u>).																											
Page 85, Paragraph 9.23	The National Planning Policy Framework (NPPF) paragraph 107 states that “the availability of and opportunities for public transport” should be considered in the process of setting local parking standards.	-	The National Planning Policy Framework (NPPF) paragraph 107 <u>11</u> states that “the availability of and opportunities for public transport” should be considered in the process of setting local parking standards.																											
Page 112, Paragraph 9.157, Table 11	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #a52a2a; color: white;"> <th>Zone</th> <th>Vehicles</th> <th>Blue Badge Parking</th> <th>Bicycles</th> </tr> </thead> <tbody> <tr> <td>Zone A: Town Centre & Central Spatial Area</td> <td style="text-align: center;">0.5 spaces per dwelling</td> <td style="text-align: center;">6% of capacity or 3 spaces, whichever is greater.</td> <td style="text-align: center;">2 per dwelling (allocated)</td> </tr> <tr> <td>Zone B: Key Towns & Other Settlements</td> <td style="text-align: center;">1 space per one bed dwelling</td> <td style="text-align: center;">Further considerations to be</td> <td style="text-align: center;">1 communal space per dwelling</td> </tr> </tbody> </table>	Zone	Vehicles	Blue Badge Parking	Bicycles	Zone A: Town Centre & Central Spatial Area	0.5 spaces per dwelling	6% of capacity or 3 spaces, whichever is greater.	2 per dwelling (allocated)	Zone B: Key Towns & Other Settlements	1 space per one bed dwelling	Further considerations to be	1 communal space per dwelling	-	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #a52a2a; color: white;"> <th>Zone</th> <th>Vehicles</th> <th>Blue Badge Parking</th> <th>Bicycles</th> <th>motorcycles</th> </tr> </thead> <tbody> <tr> <td>Zone A: Town Centre & Central Spatial Area</td> <td style="text-align: center;">0.5 spaces per dwelling</td> <td style="text-align: center;">6% of capacity or 3 spaces, whichever is greater.</td> <td style="text-align: center;">2 per dwelling (allocated)</td> <td style="text-align: center;">None</td> </tr> <tr> <td>Zone B: Key Towns & Other Settlements</td> <td style="text-align: center;">1 space per one bed dwelling</td> <td style="text-align: center;">Further considerations to be</td> <td style="text-align: center;">4 communal space per dwelling</td> <td></td> </tr> </tbody> </table>	Zone	Vehicles	Blue Badge Parking	Bicycles	motorcycles	Zone A: Town Centre & Central Spatial Area	0.5 spaces per dwelling	6% of capacity or 3 spaces, whichever is greater.	2 per dwelling (allocated)	None	Zone B: Key Towns & Other Settlements	1 space per one bed dwelling	Further considerations to be	4 communal space per dwelling	
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		1.25 spaces per two bed dwelling	negotiated on a case-by-case basis	1 additional space required for each bed above 3				1.25 spaces per two bed dwelling	negotiated on a case-by-case basis	1 additional space required for each bed above 3		
		1.5 space per three bed dwelling and greater						1.5 space per three bed dwelling and greater				
	Zone C: Villages and Parishes	1 space per 1 bed dwelling					Zone C: Villages and Parishes	1 space per 1 bed dwelling				
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		3 spaces per four-bed dwelling and greater						3 spaces per four-bed dwelling and greater				

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Page 126, Paragraph 9.217		To provide strengthened adherence to the requirements of NPPF Chapter 9 paragraph 107, an Accessibility Assessment approach is included after the start point maximum standards.	-	To provide strengthened adherence to the requirements of NPPF Chapter 9 paragraph 107 11 , an Accessibility Assessment approach is included after the start point maximum standards.																															

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Page 136, Paragraph 9.123	<ul style="list-style-type: none"> ● Domestic garages integral or attached to a dwelling will not be counted as a car parking space(s). ● Domestic garages and car ports detached from a dwelling will be counted as a car parking space(s). ● Detached tandem double garages will be counted as one parking space. ● Garages will not count towards the parking provision for a property alone. 	-	<ul style="list-style-type: none"> ● Domestic garages integral or attached to a dwelling will not be counted as a car parking space(s). ● Domestic garages and car ports detached from a dwelling will be counted as a car parking space(s). ● Detached tandem double garages will be counted as one parking space. ● <u>Domestic garages will also be considered on a design basis, therefore there may be circumstances where a tandem double garage will count as two parking spaces subject to specific design criteria.</u> ● Garages will not count towards the parking provision for a property alone.
Page 143, Paragraph 10.17	Inappropriate lorry parking is given specific reference at paragraph 109 of the NPPF, directly addressing the issue and placing the onus on local authorities to plan for lorry parking provision in appropriate locations and on the private sector to provide sufficient parking provision at distribution centres	-	Inappropriate <u>Nuisance</u> lorry parking is given specific reference at paragraph 109 13 of the NPPF, directly addressing the issue and placing the onus on local authorities to plan for lorry parking provision in appropriate locations and on the private sector to provide sufficient parking provision at distribution centres
Page 148, Paragraph 10.47	The HGV Management Plan should make it clear that a measure of responsibility for stopping and correcting any inappropriate off-site parking (and associated issues) lies with the applicant in accordance with NPPF para 109, both in terms of planning and subsequent site operation stages.	-	The HGV Management Plan should make it clear that a measure of responsibility for stopping and correcting any inappropriate off-site parking (and associated issues) lies with the applicant in accordance with NPPF para 109 <u>13</u> , both in terms of planning and subsequent site operation stages.

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Page 151 (Summary Green Box)	It is intended that HGV Management Plans set out that responsibility for stopping and correcting any inappropriate off-site parking (and associated issues) lies with the applicant/occupier in accordance with NPPF para 109, both in terms of planning and subsequent site operation stages.	-	It is intended that HGV Management Plans set out that responsibility for stopping and correcting any inappropriate off-site parking (and associated issues) lies with the applicant/occupier in accordance with NPPF para 109 13 , both in terms of planning and subsequent site operation stages.																								
Page 185, Paragraph 11.38	Where development is of sufficient scale to have an operational impact / bearing on neighbouring authorities, it is advisable to review planning conditions with these authorities, especially in instances of bus services, travel planning measures and off-site works.	-	Where development is of sufficient scale to have an operational impact / bearing on neighbouring authorities, it is advisable to review planning conditions with these authorities, especially in instances of bus services, travel planning measures and off-site works. <u>Planning obligations could be used where it is not possible to address operational impacts through a planning condition, which would otherwise have a bearing on neighbouring authorities. This is with regard to NPPF paragraph 114, part d, whereby "(d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree".</u>																								
Page 192	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2"></th> <th colspan="2" style="background-color: #c6e0b4;">To be completed by Applicant</th> </tr> <tr> <th colspan="2" style="background-color: #c6e0b4;">Access by Bus</th> <th colspan="2" style="background-color: #c6e0b4;">Score</th> </tr> </thead> <tbody> <tr> <td style="background-color: #c6e0b4;">Location and Access to Public Transport</td> <td>Is the site within a 400m safe and convenient walking distance of a bus stop?</td> <td style="text-align: center;">Yes/No</td> <td></td> </tr> </tbody> </table>			To be completed by Applicant		Access by Bus		Score		Location and Access to Public Transport	Is the site within a 400m safe and convenient walking distance of a bus stop?	Yes/No		-	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="2"></th> <th colspan="2" style="background-color: #c6e0b4;">To be completed by Applicant</th> </tr> <tr> <th colspan="2" style="background-color: #c6e0b4;">Access by Bus</th> <th colspan="2" style="background-color: #c6e0b4;">Score</th> </tr> </thead> <tbody> <tr> <td style="background-color: #c6e0b4;">Location and Access to</td> <td>Is the site within a 400m safe and convenient walking distance of a bus stop?</td> <td style="text-align: center;">Yes/No</td> <td></td> </tr> </tbody> </table>			To be completed by Applicant		Access by Bus		Score		Location and Access to	Is the site within a 400m safe and convenient walking distance of a bus stop?	Yes/No	
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		Are there barriers on direct and safe pedestrian routes to bus stops? i.e., - A lack of dropped kerbs - Footways no less than 2m wide, - A lack of formal crossings where there is heavy traffic - A lack of bus access kerbs.	Yes/No		Public Transport	Are there barriers on direct and safe pedestrian routes to bus stops? i.e., - A lack of dropped kerbs - Footways no less than 2m wide, - A lack of formal crossings where there is heavy traffic - A lack of bus access kerbs.	Yes/No	
	Frequency of Public Transport*	High - (four or more bus services an hour serving the town centre and/or local centre between 7am to 7pm Monday to Friday)	Yes/No		Frequency of Public Transport*	High - (four or more bus services an hour serving the town centre and/or local centre between 7am to 7pm Monday to Friday)	Yes/No	
		Medium - (two or three bus services an hour serving the town centre and/or local centre between 7am to 7pm Monday to Friday)	Yes/No			Medium - (two or three bus services an hour serving the town centre and/or local centre between 7am to 7pm Monday to Friday)	Yes/No	
		Low - (Less than two bus services an hour serving the town centre and/or local centre between 7am to 7pm Monday to Friday)	Yes/No			Low - (Less than two bus services an hour serving the town centre and/or local centre between 7am to 7pm Monday to Friday)	Yes/No	
<u>TOTAL SCORE</u>								
					<u>Summary</u>	-		<u>/5</u>
					Contribution to service enhancement**	Does the proposal contribute to bus priority measures serving the site?	Yes/No	
						Does the proposal contribute to improvements to bus stops, bus interchange or bus stations in the vicinity and/or provides bus stops or bus interchange in the site?	Yes/No	

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		local centre between 7am to 7pm Monday to Friday)				Does the proposal contribute to an existing or new supported bus service (Merseytravel or Community Transport)?	Yes/No	
	Contribution to service enhancement**	Does the proposal contribute to bus priority measures serving the site?	Yes/No		TOTAL SCORE			
		Does the proposal contribute to improvements to bus stops, bus interchange or bus stations in the vicinity and/or provides bus stops or bus interchange in the site?	Yes/No		Summary		/83	
		Does the proposal contribute to an existing or new supported bus service (Merseytravel or Community Transport)?	Yes/No		Comments or Action needed to correct any shortfall:			
	TOTAL SCORE							
	Summary			/8				

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	Comments or Action needed to correct any shortfall:		
Page 208, Appendix B	Monitoring Fees have been calculated to only cover reasonable costs incurred, relating to all monitoring tasks such as multi-modal counts. Charges for monitoring services will not generate a profit. Fees are indicative and may vary from site to site.	Page 209, Appendix B	Monitoring Fees have been calculated to only cover reasonable costs incurred, relating to all monitoring tasks such as multi-modal counts. Charges for monitoring services will not generate a profit. Fees are indicative and may vary from site to site. <u>The fees noted will be cognisant of the bespoke nature of each Travel Plan and the complexities therein. If necessary, alterations can be made in discussion with the Council and to their agreement.</u>
Footnotes 12 - 178			Renumbered footnotes to account for the addition of footnote.