



SUPPLEMENTARY PLANNING DOCUMENTS

**Affordable Housing
Houses in Multiple Occupation
Local Economy and Social Value
Locally Listed Heritage Assets**

**Consultation Statement
Jan 2026**

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:
- Affordable Housing SPD
 - Houses in Multiple Occupation SPD
 - Local Economy and Social Value SPD
 - Locally Listed Heritage Assets SPD
- 1.2 Once adopted, these SPDs will be a material consideration in the determination of planning applications in the Borough. The Affordable Housing SPD will replace the ‘Affordable Housing’ SPD (2010). The Local Economy and Social Value SPD will replace the ‘Local Economy’ SPD (2013). The Locally Listed Heritage Assets SPD will replace the ‘List of Locally Important Buildings’ (2011). The Houses in Multiple Occupation SPD is a new document and does not replace any existing SPD.

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 May and June 2024. 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, it was considered that the SPDs 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 17th September 2025 to Wednesday 29th October 2025.
- 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 a webform, email or by post.
- 2.5 Prior to the public consultation, the Planning Policy Team liaised with various internal Council departments, including Development Control, highways and the housing team.

Representation Summary

- 3.1 Overall, a total of 46 responses have been received from 17 representations on the draft SPDs. This includes representations from the following stakeholders:
- Active Travel England
 - British Pipeline Agency (BPA)
 - Councillor Derek Long
 - Environment Agency
 - Growth Lancashire
 - Historic England
 - Homes England
 - Lancashire County Council – Flood Risk Management team
 - Lichfields on behalf of Barratt Homes (Manchester)
 - National Highways England
 - NHS Property Services Ltd
 - NJL Consulting on behalf of Storey Homes
 - Pegasus Group on behalf of Redrow
 - The Coal Authority
 - The Mersey Forest
 - WSP on behalf of Barratt Homes
 - One response received via the online webform.
- 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 Affordable Housing SPD – Consultation Responses

The draft Affordable SPD sets out the Council's expectations in relation to affordable housing provision on development sites, to ensure that prospective developers are aware of the requirements that need to be met when submitting a planning application for residential development. It provides guidance in relation to the interpretation and implementation of the policies in the Local Plan, in particular, Policy LPC02 (Affordable Housing).

The Council is seeking to achieve a mix of housing that reflects St Helens Borough's housing needs, and in accordance with national planning policy, this includes providing housing for different groups including those who require affordable housing. The key objectives of the SPD are to:

- Provide clear guidance to assist in the determination of planning applications for developments.
- Support the increased provision of affordable housing in the borough in order to meet local needs.
- Provide a range of affordable homes in relation to tenure, size and location.
- Ensure that local residents have the opportunity to buy or rent a home that is affordable for their income.

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

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
Active Travel England	Active Travel England's statutory consultee role does not extend to plan-making consultations, therefore ATE does not respond to any consultations that it does receive.	Comments noted.

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
British Pipeline Agency (BPA)	Request to be notified of any new planning or associated works in the areas where the Shell NOP Pipeline runs through St Helens.	Comments noted.
Environment Agency	No comments to make at this time.	Comments noted.
Historic England	No comments to make.	Comments noted.
Homes England	No comments to make.	Comments noted.
Lancashire County Council (Flood Risk Management)	No comments as outside the Lancashire boundary.	Comments noted.
Lichfields (on behalf of Barratt Homes (Manchester))	<p>Clarity in presenting specific housing needs is noted. When considering the housing mix, it is important, that the drafting at Paragraph 4.14 is maintained, which allows for potential flexibility with policy implementation subject to evidence being provided and allowing for site-specific constraints. The drafting at paragraph 4.14 should also take account of evolving market conditions and wider economic factors.</p> <p>Barratt raises concerns with the housing mix.</p> <p>The requirement for 117 affordable homes per year, as set out in the 2018 SHMA, may benefit from review to ensure it reflects current housing needs and market conditions. Given</p>	Noted, however an SPD cannot change policy. The housing mix was agreed by the Planning Inspector through the Examination of the Local Plan.

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	the time elapsed since its publication, an updated assessment could provide a more accurate basis for future policy decisions.	
National Highways	No comments.	Comments noted.
NHS Property Services Ltd	<p>The NHS recommend that the Council:</p> <ul style="list-style-type: none"> • Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners. • Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies (for example employment or other economic policies). • Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers. • Set out specific requirements for key worker housing, including for NHS staff, within focussed planning policy documents where there is a demonstrated need. 	<p>The Council engage with statutory consultees in accordance with legislation. In the production of the Affordable Housing SPD the IBC and NHS Trust have been consulted.</p> <p>Whilst we welcome comments regarding ensuring local need for affordable housing for NHS staff is met, the Affordable Housing SPD is guidance which sits alongside Local Plan policy. The Affordable Housing SPD cannot create new policy.</p> <p>Whilst we welcome comments regarding ensuring local need for affordable housing for NHS staff is met, the Affordable Housing SPD is guidance which sits alongside Local Plan policy. The Affordable Housing SPD cannot create new policy or allocated new sites for development. There will be opportunities to comment on such at the next Local Plan Review.</p> <p>Setting out specific policy requirements for key worker housing again would need to be</p>

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		addressed within the Local Plan, an SPD doesn't not have the function to do this.
NJL Consulting (on behalf of Storey Homes)	<p>NJL make comments on Phasing of Affordable Housing requesting that Para 4.19 is amended to seek the proper integration of affordable housing with open market housing as it contradicts Para 8.10, with the phased delivery of each individual site to be considered on a site-specific basis. Where there are opportunities to expedite the phasing of affordable housing this will be considered favourably.</p> <p>Cascade Provisions NJL For completeness, request that paragraph 4.22 should be amended to explicitly include reference to circumstances where a Registered Provider could not be secured for the transfer of affordable housing</p>	<p>The Council do not believe that the current drafting of Para 4.19 contradicts Para 8.10. In order to maintain clarity additional text will be added to Para 4.19 which directly references that further information is set out in Para 8.10 Securing Affordable Housing Delivery. To provide further clarity wording will be added to Para 4,19 <u>"Developments that seek to delay provision of affordable housing to the end of the development will not be considered favourably."</u> Where infrastructure provision may be substantial, the Council may permit the sale of an agreed percentage of market homes before the sale or transfer of affordable homes with the remainder to be provided in tranches alongside the market housing, <u>further information is set out in Para 8.10 Securing Affordable Housing Delivery."</u></p> <p>The Council agree that there should be a timeframe associated with securing a Registered Provider. The Council have stated that applicants need to demonstrate reasonable endeavours for a period of 18 months in line with other historic applications. Para 4.22 has been amended to reflect this.</p>

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	<p> dwellings. The wording of this paragraph could be as follows: ‘The Council expect to see the required affordable housing provision provided within the application site unless the applicant can demonstrate that either there are insufficient local needs existing to justify on-site provision, including circumstances where it is not possible to transfer the affordable housing provision to a Registered Provider (and reasonable endeavours have been used to do so for a 12 month period), or there are overriding benefits by making alternative provision ‘off-site...’ (NJL Emphasis) Providing clarity on the above timeframes will set out the Council’s expectations for how to engage with Registered Providers in a ‘timely, rigorous, and effective manner’, informing applicants to be proactive through the planning process which is to be set out within the supporting Affordable Housing Statements.</p> <p>In establishing the level of payment for a commuted sum (Paragraph 4.24), NJL consider that it would be beneficial to future s106 negotiations if the Draft SPD also acknowledged that such financial contributions can be made payable to the</p>	<p>The Council agree that additional wording should be included in Para 4.24, therefore wording to state that the phasing of financial contributions will be agreed on a site by site basis.</p>

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	<p>Council on a phased basis much in the same way if provision was secured on-site. We would propose that suitable wording is included in Paragraph 4.24.</p>	
<p>Pegasus Group (on behalf of Redrow)</p>	<p>Redrow are generally supportive of the general approach of the draft SPD, which is flexible in nature and not overly prescriptive. This is very important, as delays to the delivery of housing should be avoided where possible noting the increased housing requirements (potentially by more than 50%) that St Helens will face from July 2027, or earlier if the Local Plan is reviewed before then.</p> <p>Redrow object to some elements of the SPD as currently drafted they asks for the following amendments to the SPD:</p> <ul style="list-style-type: none"> • Remove reference at paragraphs 4.18-4.20 to the need to contract with an RP before the commencement of above ground works. There are wide-spread issues with contracting with RPs across the country which are leading to significant delays in delivering housing. • Remove paragraph 8.10 in its entirety – which seeks to tie occupation of market 	<p>Comments from Pegasus are noted.</p> <p>It is noted that the Local Plans affordable housing requirement is 117 affordable houses per annum. Whilst we confirm that there has been some under delivery according to the National Government published data on affordable housing the figures the Council hold are slightly higher, alongside year 2024-2025 which show a better position on performance for affordable Housing Delivery in the Borough.</p> <p>With regards to onsite affordable housing provision the SPD provides extended guidance on affordable housing, and it is not the job of the SPD to reiterate policy contained within the Local Plan. Therefore, flexibility regarding the delivery of affordable housing on a site-by-site basis is covered in LPC02: Affordable Housing of the Local Plan. Para 4.14 of the Affordable Housing SPD sets out that affordable housing provision should be in line with the latest definition of affordable housing set by the Government. Noted. Para 4.22 “...including circumstances where it is not possible to transfer the affordable</p>

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	<p>housing with affordable housing delivery and contracting with a RP.</p> <ul style="list-style-type: none"> • Instead, the SPD should support the use of cascade mechanisms within Section 106 Agreements – which allow for alternative tenure splits/removal of local criteria after a period of agreed marketing has been undertaken. This approach will ensure no unnecessary delays to the delivery of much needed housing. • Refer to the national viability guidance which has been promised before the end of 2025, and specifically in respect of affordable housing on Grey Belt sites, as such sites are going to play an increasingly important role in meeting affordable and wider housing needs in the coming years • Contain further guidance in respect of nomination agreements around local connections, as while we welcome that the 25% affordable rent to those with local connections is encouraged rather than mandated, we require further clarity on timescales and staircasing arrangements to provide more certainty 	<p><u>housing provision to a Registered Provider (and reasonable endeavours have been used to do so for a 18 month period)</u> Para 20 - Whilst the Council welcomes comments on this there is flexibility within the SPD to deal with sites on a site by site basis.</p> <p>The SPD is produced in line with the most up to date policy and legislation available. With regards to the hierarchy of policy the NPPF and PPG will take precedent over any SPD should the information be updated post adoption of the SPD.</p> <p>Para 8.15 has been included to provide flexibility in noting that local needs are important factors for the Council in the delivery of affordable housing. Under One Roof is the Councils choice based letting system and will allocate housing on eligibility criteria. On 09 April 2025 St Helens Borough Council implemented its new Housing Allocations Policy. All applicants are now required to live in St Helens or have a local connection. All applicants are required to answer new questions and verify their circumstances by providing evidence of their circumstances.</p>

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	to developers and avoid delivery delays.	
The Coal Authority	No specific comments to make	Comments noted.
WSP (on behalf of Barratt Homes)	<p>Barratt Homes expresses general support for the proposed SPD and recognises the council's dedication to meeting affordable housing needs within the borough.</p> <p>While Barratt Homes endorses the overarching strategy of the SPD, including the zonal framework and affordable housing percentage targets, Barratt Homes believes a small number of targeted refinements will improve deliverability and provide certainty for applicants and accelerate housing supply. The following practical enhancements are therefore proposed:</p> <ul style="list-style-type: none"> • Make clear the alignment to Local Plan Policy LPC02 by reproducing the Affordable Housing Zones map and a short, visual decision tree for thresholds, percentages and tenure expectations helping applicants translate plan policy into proposals; • Clarify the First Homes position proportion and set out a market tested 	<p>Comments noted.</p> <p>Whilst noted that the SPDs can be read in conjunction with others and the Local Plan as a whole, it is not feasible to cross reference every policy and SPD due to them being updated at various times and some might not be applicable to each planning application. Each application should consider the policy and requirements on a case by case basis. It is noted and welcomed that WSP support the Councils position on SEA/HRA screening.</p> <p>The SPD avoids summarising elements of affordable housing to avoid repetition, however the contents table clearly defines the items set out within the SPD.</p> <p>The St Helens Local Plan 2022, sets out the Housing Mix through a dedicated policy that was approved at Examination. SPD's cannot change or introduce policy from the Local Plan.</p> <p>The Vacant Building Credit section is written in accordance with the PPG and sets out a worked example in appendix 2. Some of the information</p>

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	<p>cascade where demand for First Homes is weak;</p> <ul style="list-style-type: none"> • Clarify how Vacant Building Credit (VBC) will be applied locally by including worked examples including how demolition/rebuild sequences and partial retention are treated; • Consider clarifying the use of planning conditions as a preference in order to deliver affordable housing faster; • Publish an Affordable Housing Statement (AHS) template proportionate to scheme scale reducing validation delay 	<p>requested in the WSP representation is contained in Para's 5.4-5.7. In order to avoid any issues with an application Para 5.8 states that; the Council will determine on case by case basis whether a building is vacant or abandoned.</p> <p>Whilst the Council accept that there has previously been some shortfalls in affordable housing delivery, there are a number of large schemes being brought forward by RSLs that will fill a backlog. Due to the nature of RSLs only taking on a site when it is complete this can mean that the figure will rise significantly when a number of larger sites are completed in year 2025-26. Housing mix and the proportion of those for affordable home ownership was determined through the Local Plan and is noted in policy therefore this cannot change via the SPD. A Local Plan Review would be the next opportunity for such changes. Barratt Homes concerns over viability are noted, however the Local Plan which sets out the housing mix and tenure expectations was subject to a whole plan viability assessment as part of the examination in public.</p> <p>Policy LPC02: Affordable Housing Part 6 of the St Helens Local Plan states "Where affordable housing is to be provided on site, adequate provisions must be made, for example through</p>

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		<p>conditions and / or a Section 106 agreement, to ensure that such housing is made available in perpetuity for occupation by persons who are in affordable housing need, or for any subsidy to be recycled to support affordable housing provision elsewhere." This common theme of via planning condition or S106 agreement to secure affordable housing contributions is evident throughout the Affordable Housing SPD. Flexibility is given due to certain funding/financial opportunities requiring S106 agreements over conditions. Each application will be assessed on a case by case basis.</p> <p>Para 4.26 of the Affordable Housing SPD encourages developers to submit an Affordable Housing Statement to inform pre-application discussions. A template has not been included as part of the SPD as each statement could alter slightly, however having a statement provided as part of the pre application it allows for feedback in the process. It is not common practice for LPAs to contain a template as part of their Affordable Housing SPD.</p>

St Helens Borough Council Houses in Multiple Occupation SPD – Consultation Responses

The draft Houses in Multiple Occupation SPD sets out the Council's approach to better manage the development and provision of new Houses in Multiple Occupation throughout St Helens. It provides guidance in relation to the interpretation and implementation of policies in the Local Plan, in particular, Policy LPC01 (Housing Mix) along with Development Management policies such as LPD01 (Ensuring Quality Development) and LPD02 (Design and Layout of New Housing) of the Local Plan.

The SPD will be used in the determination of any planning application for the development of these properties within St Helens and will help improve the standards of the accommodation that is provided and reduce potential detrimental impacts on neighbours. It assists in the interpretation of policies within the Local Plan and sets out guidance and good practice for planning applicants to enable the delivery of better planning outcomes.

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

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
Active Travel England	Active Travel England's statutory consultee role does not extend to plan-making consultations, therefore ATE does not respond to any consultations that it does receive.	Comments noted.
British Pipeline Agency (BPA)	Request to be notified of any new planning or associated works in the areas where the Shell NOP Pipeline runs through St Helens.	Comments noted.

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
Councillor Derek Long	<p>Buffer size and concatenation – appreciated that Wigan uses 50 metre buffers and that the 50 metre buffer is established practice. Given the arrangement of housing in the borough why is a 75 metres buffer not being used. A higher number HMOs are likely to spring up, due to the relatively low costs of purchasing properties in the borough.</p> <p>There is a high concatenation of HMOs on main roads (e.g. 6 on North Street and 7 on East Prescott Road (2024 data)). This links also to size where older properties are concentrated on Victorian roads. 50 metres on East Prescott Road does not provide much separation between a number of potentially very large HMOs.</p> <p>The concatenation of HMOs along main roads beyond 50 metres could tend to alter the character of the road and by extension the impression of the town.</p>	<p>The 10% method within a 50m radius is considered an appropriate approach, which is widely used by other Local Planning Authorities (including Wigan, Halton, Cheshire East and Cheshire West and Chester). The assessment of the number of existing HMOs within a 50m radius would include both small and large HMOs and not just those HMOs that require planning permission. The Council will gather this information from planning permission data, licencing information and other data sources when assessing planning applications for new HMOs.</p> <p>It is acknowledged that there are higher concentrations of HMOs in some locations compared to others. The HMO SPD will allow for areas with higher concentrations to be better managed and for new HMOs within these areas to be fully considered in the determination of planning applications.</p> <p>It is appreciated that HMOs can, if not managed appropriately, result in a change to the character and / or appearance of an area, especially when there is a large concentration in an area. Policy LPC01 (Housing Mix) specifically mentions the impact on the character / appearance of an area</p>

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	<p>Size of HMOs - It been a practice of RPs for many years not to concentrate single residents in facilities, due to the probability of reinforcing adverse behaviours. Consideration should be added about the cumulative impact of larger units on an area for example (say above 8 persons).</p> <p>Suggested that the buffer should be extended to account for a) the potential size of the HMOs (large Edwardian properties) and b) their specific concentration on radial roads (and therefore older properties).</p>	<p>as a consideration in applications for the change of use or sub-division of existing buildings to form flats / HMOs, and the purpose of the SPD is to set a number of requirements to seek to avoid such harm (i.e. a concentration threshold and restricting adjacent HMOs as well as requirements in terms of waste management, external alterations and parking).</p> <p>In respect of larger HMOs of 7 or more persons, these are sui generis (a use which does not fit into one of the other categories or classes) and therefore planning permission for the conversion of a building would be required. As such, when an application is submitted for a larger HMO, the cumulative impact of such a HMO, along with smaller ones within area, will be considered and the requirements within the SPD taken into account.</p> <p>The number of HMOs along with the size and concentration of them will be monitored over the next 12 months to establish whether permitted development rights need to be restricted (by the use of Article 4 Directions in the future). Any required changes could also be considered as part of a future review of the Local Plan.</p>

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
Environment Agency	<p>Flood risk may be a material consideration for future determination where houses in multiple occupation related applications are proposed within flood zone 3 because bringing additional occupants in or seeking to create habitual room in basements may result in an increased risk of flooding.</p> <p>National Planning Policy Framework Annex 3: Flood risk vulnerability classification considers a basement dwelling to be a 'highly vulnerable' development to flood risk.</p> <p>In Planning Practice Guidance, Flood Risk and Coastal Change, Table 2: Flood risk vulnerability and flood zone 'incompatibility' ii, considers more vulnerable development types in flood zone 3 should not be permitted, and the exception test to be applied if proposed within flood zone 2.</p>	Information to be added regarding the use of basements within Flood Zones 2 and 3.
Historic England	No comments to make.	Comments noted.
Lancashire County Council (Flood Risk Management)	No comments as outside the Lancashire boundary.	Comments noted.
Local Highway Authority	Verbal advice received from Local Highway Authority relating to parking standards.	Parking section of SPD amended/updated as required.

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
National Highways	No comments.	Comments noted.
The Coal Authority	No specific comments to make	Comments noted.
Response from online webform	'No HMOs' answered to all sections of webform.	<p>Comments noted.</p> <p>The SPD cannot restrict the provision of HMOs. It however seeks to help improve the standards of the accommodation that is provided, reduce potential detrimental impacts on neighbours, assist in the interpretation of policies within the Local Plan and set out guidance and good practice for planning applicants to enable the delivery of better planning outcomes.</p>

St Helens Borough Council Local Economy and Social Value SPD – Consultation Responses

The draft Local Economy and Social Value SPD set outs, to developers and applicants, the Council's approach to encouraging economic growth within the Borough alongside the Council's aspirations to secure additional outcomes (known as social value) for local residents, communities and businesses e.g., through education, employment, training and other development opportunities such as housing. This involves increasing employment opportunities by helping local businesses to improve, grow and take on more staff, helping businesses to find suitable staff and suppliers, especially local ones, and improving the skills of local people to enable them to take advantage of the resulting employment opportunities.

The following table summarises the responses received in relation to the draft Local Economy and Social Value SPD, and includes the Council's response to each of the comments. Appendix C includes a Table of Changes proposed for the draft Local Economy and Social Value SPD.

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
Active Travel England	Active Travel England's statutory consultee role does not extend to plan-making consultations, therefore ATE does not respond to any consultations that it does receive.	Comments noted.
British Pipeline Agency (BPA)	Request to be notified of any new planning or associated works in the areas where the Shell NOP Pipeline runs through St Helens.	Comments noted.
Environment Agency	Advised to make amendments to flood risk, paragraph 3.35 as the interpretation of National Planning Policy Framework, Annex 3, would be	Comment noted and wording changed to the Flood Risk section of paragraph 3.35 from 'highly vulnerable' to 'more vulnerable'.

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>'Tourism and leisure developments could include camp and glamping sites, barn conversions for holiday lets, wedding venues with overnight accommodation etc' would fall under 'Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan', which is considered 'more vulnerable' to flood risk. This is an important point because under Table 2: Flood risk vulnerability and flood zone 'incompatibility', of Planning Practice Guidance Flood Risk and Coastal Change, states highly vulnerable development should not be permitted in flood zone 3 and the exception test is required if proposed in flood zone 2, while more vulnerable development requires the exception test in flood zone 3 but not in flood zone 2.</p>	
Historic England	No comments to make at this time.	Comments noted.
Lancashire County Council (Flood Risk Management)	No comments as outside the Lancashire boundary.	Comments noted.
Lichfields (on behalf of Barratt Homes (Manchester))	Suggested that the 18-month marketing period extension from 12 months is not required, and that the Council should adopt a more flexible and pragmatic approach to the application of this.	The 18-month marketing period has been agreed with Development Management Officers and is the average time period for historical cases. There is a template for Appendix D included which can be followed and gives more detailed guidance on this. The 30 dwellings

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	<p>Recommend that the SPD acknowledges that in some cases – such as where a site is demonstrably unviable or no longer fit for its original employment use – a lengthy marketing period may not be appropriate. A more nuanced approach would support the timely regeneration of underused or obsolete sites, for example to deliver homes.</p> <p>Says that there is no clear explanation of why the threshold of over 30 dwellings requires a Local Employment and Skills Statement at construction phase, suggests that this should be checked and justified.</p> <p>Supports the principal of agreeing a Social Value Strategy in the form of an Employment and Skills Statement. The SPD states that it is the intention that the Council secure the delivery of this through planning obligations or conditions (if appropriate). They believe that there is an opportunity to strengthen the SPD by providing more structured guidance and expectations for developers and further clarity on how these will be assessed and how success will be measured. Suggests flexibility in the application of Local Employment and Skills requirements (and any other requirements in the SPD).</p>	<p>threshold is used by a number of authorities in the north-west. Paragraph 3.39 set outs that <i>'applicants are recommended to engage in pre-application discussions with the Council in order to determine the individual requirements for, and the content of, an Employment and Skills Statement.'</i> During these discussions, flexibility can be discussed. Paragraph 3.41 states that <i>'The scope of the statement and measures proposed should be proportionate to the scale of the development and be individually tailored to ensure that the skills and employment opportunities are provided at the right time to benefit both the developer and residents. Early engagement with the Council's Employment and Skills Team is recommended. The statement should include a reporting schedule and detail meetings to be undertaken with the Council, where necessary, with the frequency of such meetings dependant on the duration of the development.'</i> Therefore, each application is assessed on a case-by-case basis, amount of detailed information required will be assessed on that.</p>

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National Highways	<p>National Highways welcomes the Council's commitment to embedding economic growth and social value into planning and development processes. We note that while the SPD does not set out transport-specific objectives, it appropriately references relevant Local Plan policies (such as LPA03 and LPA07) and complementary SPDs, including the Transport and Travel SPD, which address matters of access, freight, and travel planning.</p> <p>Given the SPD's support for the delivery of significant employment land and its emphasis on strategic connectivity, we encourage early engagement on proposals that may impact the Strategic Road Network (SRN). This will help ensure that development is supported by appropriate transport assessments and mitigation measures, safeguarding the safe and efficient operation of the SRN.</p> <p>We look forward to continued collaboration with St Helens Council to ensure that economic development is delivered sustainably and in a manner that protects the integrity of the SRN.</p>	Comments noted.
Pegasus Group (on behalf of Redrow)	Paragraphs 1.12 to 1.15 – Important for the SPD to encourage adding social value/supporting it,	Paragraphs 1.12-1.15 provide an outline of social value and paragraph 1.14 notes that the

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	<p>but not to be overly prescriptive. Provides further comments on the Local Employment and Skills Statement contained at Appendix D.</p> <p>Paragraphs 3.3 to 3.21 – Supports the existing employment allocations and uses being protected, and acknowledges the criteria of policy LPA03, however, they encourage flexibility in the application of the criteria.</p> <p>Paragraphs 3.37 to 3.44 Redrow object to the Template at Appendix D requesting the Gross Development Value of the Scheme as it is commercially sensitive information. They recommend that this is removed.</p> <p>Clarify in Para 3.41 whether the early engagement with the Council's Employment and Skills Team can be done through the pre-app process, or with direct engagement with that team.</p>	<p>list is not exhaustive. As per Pre-Application process, employment and skills statement will be shared with the Council's Employment and Skills team, and dialogue will be exchanged. Paragraph 3.41 states that <i>'The scope of the statement and measures proposed should be proportionate to the scale of the development and be individually tailored to ensure that the skills and employment opportunities are provided at the right time to benefit both the developer and residents. Early engagement with the Council's Employment and Skills Team is recommended. The statement should include a reporting schedule and detail meetings to be undertaken with the Council, where necessary, with the frequency of such meetings dependant on the duration of the development.'</i> Therefore, each application is assessed on a case-by-case basis, amount of detailed information required will be assessed on that.</p>
The Coal Authority	No specific comments to make.	Comments noted.
The Mersey Forest	Suggests strengthening paragraph 1.2 with a clear reference to the role of the natural environment/green recovery/green infrastructure in underpinning local economies and bringing social value in themselves. Helpful wording /	Thank you for your comments surrounding The Mersey Forest Plan. We have now referred to the plan within this document.

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>rationale to support this can be found in The Mersey Forest Plan (https://merseyforest.org.uk/our-plan/)</p> <p>Suggests stronger wording in paragraph 1.12-1.15, moving beyond protecting the environment, to supporting nature recovery rather than just protection.</p> <p>Suggests using their Social Value Calculator and green infrastructure valuation toolkit, in both Sections 1 & 4.</p> <p>Suggests mentioning a reference to the 'Mersey Forest Plan' in either the Social Value Policy OR in section 3. (Provides the wording to this)</p> <p>The Mersey Forest Plan has a number of key principles that are relevant to this SPD, mentions these in part 7.</p>	
WSP (on behalf of Barratt Homes)	Say that where the SPD sets out the expectation that major residential developments defined as schemes of 30 units of more will be required to submit a Local Employment and Skills statement, they suggest that this statement should set out how the development will support local employment, apprenticeships, training and the	Appendix D provides a template that requires information on a skilled and productive, inclusive & future workforce, as well as community and other benefits. Paragraph 3.38 sets out the threshold for what requires and Employment and Skills Statement. Paragraph 3.39 set outs that <i>'applicants are recommended to engage in pre-application discussions with the Council in</i>

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>use of local suppliers, both during consultation and in the operation phase.</p> <p>Suggests that section 1.3 is amended to clarify that Employment and Skills Statements are not mandatory for all developments.</p> <p>In addition to this, they say that Appendix D should provide a simplified version of the Employment and Skills Statement template for residential schemes.</p> <p>Suggest that Section 1.14 is amended to include reference to the role of volume housebuilders in delivering social value through placemaking, design quality and long-term stewardship.</p> <p>Encourages the Council to allow for site-specific viability testing and to consider flexibility in cases where social value requirements would compromise the ability to deliver much-needed new homes, affordable housing and infrastructure.</p> <p>Suggests that the SPD should make clear that where viability is demonstrably affected, alternative approaches such as phased delivery,</p>	<p><i>order to determine the individual requirements for, and the content of, an Employment and Skills Statement.</i> During these discussions, flexibility can be discussed. A template can be discussed at pre-app stage and amended on a case-by-case basis. Paragraphs 1.12-1.15 provide an outline of social value and paragraph 1.14 notes that the list is not exhaustive.</p> <p>The Local Economy and Social Value SPD is guidance which sits alongside Local Plan policy. The Local Economy and Social Value SPD cannot create new policy or allocate new sites for development. There will be opportunities to comment on such at the next Local Plan Review.</p>

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	pooled contributions, or targeted interventions may be appropriate.	

St Helens Borough Council Locally Listed Heritage Assets SPD – Consultation Responses

The draft Locally Listed Heritage Assets SPD sets out the criteria for identifying buildings and structures of special local architectural and historical interest, the process for adding these buildings/structures to a 'local heritage list' and to offer them a level of protection against undesirable alterations and/or irreplaceable loss. It provides guidance in relation to the interpretation and implementation of the policies in the Local Plan, in particular, Policy LPC11 (Historic Environment).

It is hoped that establishing a local heritage list will encourage owners and occupiers of those buildings and structures to take pride in the care of their property and have the satisfaction of being involved in the conservation of a building/structure for the benefit of present and future generations.

The following table summarises the responses received in relation to the draft Locally Listed Heritage Assets SPD, and includes the Council's response to each of the comments. Appendix D includes a Table of Changes proposed for the draft Locally Listed Heritage Assets SPD.

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
Active Travel England	Active Travel England's statutory consultee role does not extend to plan-making consultations, therefore ATE does not respond to any consultations that it does receive.	Comments noted.
British Pipeline Agency (BPA)	Request to be notified of any new planning or associated works in the areas where the Shell NOP Pipeline runs through St Helens.	Comments noted.
Environment Agency	No comments to make at this time.	Comments noted.

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
Growth Lancashire	Minor text changes suggested and additional text in section 6 (Demolition): 'Retention and reuse are preferred approaches that recognize the contribution of a building/structure to local character. The Council encourages applicants to explore creative and sympathetic solutions that retain and adapt locally listed buildings/structures for new uses.'	Minor text changes made and additional paragraph in section 6 added.
Historic England	We encourage you to follow the guidance set out in our Advice Note, particularly in terms of the process of preparing of a local list, and the content of the descriptions of non-designated heritage assets identified within the list. Paragraph 12 of HEAN 7 is clear that the more information that can be provided within a description about the significance of an asset and the reasons for its inclusion on the local list, the more effective its identification as a non-designated heritage asset will be. Going forward, we would encourage you to follow HEAN 7 Paragraph 13, which advises that it is good practice to have a relevant policy in your Local Plan (and/ or Neighbourhood Plan) that sets out how proposals affecting the heritage assets on your list will be considered.	Thank you for your comments. The guidance within HEAN 7 has been noted and referenced during the creation of this SPD.

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
Lancashire County Council (Flood Risk Management)	No comments as outside the Lancashire boundary.	Comments noted.
Lichfields (on behalf of Barratt Homes (Manchester))	As set out in Section 3.0 of the SPD, locally listed heritage assets are non-designated. These are not therefore afforded statutory protection, and any consideration of such assets should be proportionate and balanced against meeting development needs. This point should be made clear in the drafting of the SPD and would be appropriate to include upfront in the document within the 'Aims and Objectives' set out on page 2.	The SPD notes that there are no statutory protections provided through locally listing assets.
National Highways	No comments.	Comments noted.
Pegasus Group (on behalf of Redrow)	<p>Paragraphs 1.2, 1.3 and 3.1 should be clear about whether sites of archaeological interest are included or excluded from identification.</p> <p>Paragraph 2.7 - Policy LPC11 of the Local Plan, states that "development which would cause harm to, or loss of, non-designated assets will be refused, unless any public benefit from the development would outweigh such harm or loss." This policy wording, as applied to non-designated heritage assets (such as those on a local list), is</p>	<p>The category of archaeological has been added to paragraph 4.1 and this inclusion criteria is also clear throughout the remainder of the SPD.</p> <p>The wording of 'substantial public benefit' will be adjusted to 'benefit' to align with paragraph 5 of Local Plan Policy LPC11.</p>

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>not consistent with the NPPF and does not reflect the clear distinction between designated and non-designated heritage assets. We therefore recommend that the SPD explicitly distinguishes between designated and non-designated heritage assets and clarifies the differing policy approaches for determining planning applications affecting them.</p> <p>Recommend paragraph 4.4 is amended for accuracy. Works affecting the setting of a Listed Building do not require Listed Building Consent unless those works affect a structure within its curtilage that is itself listed by virtue of Section 1(5) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>In Section 5: Primary criteria - Suggested that historic criterion should also incorporate a quality threshold. Secondary criteria - Under the criterion for 'Authenticity (Age, Rarity, Intactness)', the statement that "from 1870 to 1945, other considerations will play a bigger part" is too vague to be meaningful. The SPD should clarify the "other considerations" are to ensure transparency and consistency.</p>	<p>Text amended as follows: Any works, which affect the character and/or setting or <u>appearance</u> of a listed building, requires Listed Building Consent, with some works within the curtilage of a listed building also requiring planning permission.</p> <p>A two tier approach has been taken to the selection criteria of the locally listed heritage assets. The nominated asset will be reviewed in line with these criterion.</p>

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Paragraph 6.7 lists types of development requiring planning permission in Conservation Areas. We recommend adding a footnote stating: “as per the current iteration of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended.”</p> <p>Paragraph 6.18 - The SPD should adopt a more nuanced approach on facadism, recognising that it can, in certain cases, represent a pragmatic and sensitive form of conservation.</p> <p>Paragraph 6.19 - This approach does not reflect the NPPF, which requires only a ‘balanced judgement’ for non-designated heritage assets, rather than a test of substantial public benefit. We therefore recommend that the SPD be amended to align with national policy.</p> <p>Section 7 – suggest GIS layers to be publicly accessible.</p> <p>Regarding the Selection Review Panel it is recommended that details of assets rejected for</p>	<p>Comment noted.</p> <p>Paragraph 6.18 has been updated in line with comments from Growth Lancashire: Retention and reuse are preferred approaches that recognise the contribution of a building/structure to local character. The Council encourages applicants to explore creative and sympathetic solutions that retain and adapt locally listed buildings/structures for new uses.</p> <p>The wording of ‘substantial public benefit’ will be adjusted to ‘benefit’ to align with paragraph 5 of Local Plan Policy LPC11.</p> <p>Comment Noted.</p> <p>Paragraph 7.18 notes the members that make up the selection review panel.</p>

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>inclusion published and details of panel members, including relevant expertise/ accreditations, be published on the Council's website.</p> <p>We recommend that the SPD clearly outline the process for ad-hoc identification. For example, prior to requesting a Heritage Statement from the applicant, both the Planning Officer and Conservation Officer should agree that the site constitutes a potential heritage asset, undertake a site visit, and provide a written assessment against the criteria to the applicant. At the pre-application stage, officers should also proactively assess whether the site contains buildings or structures of potential heritage interest. This commitment should be included within the SPD.</p> <p>The SPD does not clarify the relationship between heritage asset lists included in Neighbourhood Plans and the Council's Local Heritage List. We recommend clarifying whether such assets will require ratification by the Selection Review Panel to ensure consistency across the Borough.</p>	<p>Nominations for the local list can be made at any stage. If an asset has been nominated but is yet to be determined at the time a planning application comes forward, the planning officer shall be informed of this.</p>
The Coal Authority	No specific comments to make	Comments noted.

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
The Mersey Forest	<p>Paragraph 1.2 - Consideration should be given towards the natural environment, and trees in particular, which can also be considered heritage assets and have local importance even when not statutorily designated.</p> <p>Paragraph 6.21 - We welcome the reference to the importance of trees, hedges, and green spaces. The wording could be stronger in recognising that some trees are locally important, ways these can be identified, and that some locally important trees are protected by TPOs.</p>	<p>Thank you for your comments. The SPD has been drafted in line with PPG on the Historic Environment, which does not include features such as trees within its definition of non-designated heritage asset, though landscape can be included.</p>
WSP (on behalf of Barratt Homes)	<p>Should explicitly reference 'balanced judgement' as per the NPPF. Decisions should be made through the NPPF balanced judgement rather than the stricter tests for designated assets, and that marketing/feasibility evidence may be considered where demolition is proposed due to structural failure or proven non-viability. The SPD should Cite NPPF NDHA policy and Historic England's GPA to avoid conflation with listed building policy tests.</p> <p>It should be stated more prominently that the level of information required must always be proportionate to the scale of works and the</p>	<p>NPPF Paragraph 216 and Historic England's GPA are referenced in the SPD.</p> <p>Comment noted.</p>

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>asset's significance (per NPPF and Historic England's Good Practice Advice).</p> <p>For nomination and review – suggested there should be clear opportunities for landowners and developers to make representations and provide evidence. Regular reviews and opportunities for developer input.</p> <p>Details should be included in the SPD of how applications to restrict development (rather than preserve heritage) should be managed - e.g. by rejecting incomplete or anecdotal submissions or disallow last-minute nominations once an application is validated.</p> <p>Suggests annual statistics on: number of NDHAs added/removed; number of applications involving NDHAs; average determination times; and outcomes at appeal (if any) are published.</p> <p>The SPD should acknowledge the potential implications of retaining or restoring locally listed assets for the viability and deliverability of strategic residential developments. Suggest allowance for site-specific viability testing and to consider flexibility in cases where retention would compromise delivery.</p>	<p>The nomination and review process is outlined within the SPD.</p> <p>The nomination and review panel process will ensure that only nominations made that are of the greatest merit or local interest will be included within the local list.</p> <p>The local list will be updated on an ad-hoc basis and will be a 'live document'. As per paragraph 7.21: The relevant GIS layer, which is available both internally and externally, will also be updated accordingly.</p> <p>Issues regarding retention are covered under Section 6. As with any given planning application any issues on viability and sustainability would be assessed on a site-by-site basis.</p>

RESPONDENT (NAME/ORGANISATION)	SUMMARY OF COMMENT	RESPONSE
	<p>Suggest that the document must clearly cross-reference Policy LPC11: Historic Environment and related development management policies with a clear statement of material weight, while recognising that SPDs cannot introduce new policy or new financial burdens.</p> <p>Request the SPD allows for modern, energy-efficient, and adaptable homes, and that requirements for design and integration are proportionate.</p> <p>Request the SPD provides clear examples of public benefits such as affordable housing, infrastructure, and regeneration that may outweigh harm to a locally listed asset.</p>	<p>Policy LPC11 has been referenced within the SPD document.</p> <p>Section 6 of the SPD gives guidance on works to buildings or structures on the Local Heritage List. Any planning application brought forward will be reviewed in line with this and other Local Plan policies and assessed on a case-by-case basis.</p> <p>The wording in paragraph 6.19 (now 6.20) has been updated from 'substantial public benefits' to 'benefits' in line with paragraph 5 of Local Plan policy LPC11.</p>
Homes England	No comments.	Comments noted.

Consultation Summary

Affordable Housing SPD

Overall, out of the initial 13 responses received, 5 made specific or general comments on the publication draft Affordable Housing SPD.

A summary of the main comments raised include:

- Issues over housing mix and outdated evidence based.
- Ongoing engagement with the NHS and its associated bodies to increase affordable housing provision for the NHS key workers.
- Concerns over the period of time applicants are allowed to secure a Registered Social Landlord to take on affordable housing provision.
- Concerns over S106 agreements and affordable housing statements.

Houses in Multiple Occupation SPD

Overall, out of the initial 9 responses received, 3 made specific or general comments on the publication draft Houses in Multiple Occupation SPD. In addition, verbal advice has been received from Local Highway Authority relating to parking standards.

A summary of the main comments raised include:

- Concerns relating to a 50-metre buffer used within the SPD, and the reasons why a larger distance hasn't been used.
- The concatenation of HMOs along main roads beyond 50 metres having the potential to alter the character of the road and by extension the impression of the town.
- The concentration of HMOs on main/radial roads, linked to size where older properties are concentrated on Victorian roads, and consideration added about the cumulative impact of larger units on an area.
- Suggestion that the buffer should be extended to account for the potential size of the HMOs and their specific concentration on radial roads.
- Flood risk being a potential material consideration where HMO related applications are proposed within flood zone 3 because bringing additional occupants in or seeking to create habitual room in basements may result in an increased risk of flooding.

Local Economy and Social Value SPD

Overall, out of the initial 11 responses received, 5 made specific or general comments on the publication draft Local Economy and Social Value SPD.

A summary of the main comments raised include:

- Suggests flexibility on the Local Employment and Skills Statement
- Suggestions that the 18-month marketing period extension from 12 months is not required.
- Comments that there is no clear explanation of why the threshold of over 30 dwellings requires a Local Employment and Skills Statement at construction phase, suggestions that this should be checked and justified.
- To refer to 'The Mersey Plan' within the SPD.

Locally Listed Heritage Assets SPD

Overall, out of the initial 13 responses received, 6 made specific or general comments on the publication draft Locally Listed Heritage Assets SPD.

A summary of the main comments raised include:

- Suggestion of the use of 'balanced judgement' and additional flexibility within the text under section 6 of the SPD.
- Suggestions of additional clarity on the nomination and review process, both in terms of who is on the review panel and the information that will be publicly available.

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 Affordable Housing SPD

Page no. and paragraph no.	Current paragraph wording	Change (deleted text in strikethrough ; new text <u>underlined and bold</u> ; changes to diagrams, tables etc. described in <i>italic text</i>).
Page 15 Para 4.6	<p>The following forms of development are typically not required to provide affordable housing:</p> <ul style="list-style-type: none"> • Residential institutions (that do not comprise self-contained dwellings) - Use Class C2. • Specialist or supported housing schemes provided and managed by the Local Authority or Registered Provider (that are not self-contained dwellings). • Hotels - Use Class C1. • Purpose built student accommodation permitted as non-permanent places of residence, for example university student accommodation and boarding schools / colleges. • Accommodation limited to holiday use through a planning condition. • Residential units converted under permitted development rights. • Dwellings permitted because they are necessary for those employed in a specific business or industry to reside in, and that are subject to specific occupancy conditions. 	<p>The following forms of development are typically not required to provide affordable housing:</p> <ul style="list-style-type: none"> • Residential institutions (that do not comprise self-contained dwellings) - Use Class C2. • Specialist or supported housing schemes provided and managed by the Local Authority or Registered Provider (that are not self-contained dwellings). • Hotels - Use Class C1. • Purpose built student accommodation permitted as non-permanent places of residence, for example university student accommodation and boarding schools / colleges. • Accommodation limited to holiday use through a planning condition. • Residential units converted under permitted development rights. • <u>Houses of Multiple Occupation (HMOs)</u> • Dwellings permitted because they are necessary for those employed in a specific business or industry to reside in, and that are subject to specific occupancy conditions.
Page 19	Developments that seek to delay provision of affordable housing to the end of the development will not be	Developments that seek to delay provision of affordable housing to the end of the development will not be

Page no. and paragraph no.	Current paragraph wording	Change (deleted text in strikethrough ; new text <u>underlined and bold</u> ; changes to diagrams, tables etc. described in <i>italic text</i>).
Para 4.19	considered favourably. Where infrastructure provision may be substantial, the Council may permit the sale of an agreed percentage of market homes before the sale or transfer of affordable homes with the remainder to be provided in tranches alongside the market housing.	considered favourably. Where infrastructure provision may be substantial, the Council may permit the sale of an agreed percentage of market homes before the sale or transfer of affordable homes with the remainder to be provided in tranches alongside the market housing, <u>further information is set out in Para 8.10 Securing Affordable Housing Delivery.</u>
Page 19 Para 4.22	The Council expect to see the required affordable housing provision provided within the application site unless the applicant can demonstrate that either there are insufficient local needs existing to justify on-site provision or there are overriding benefits by making alternative provision 'off-site', in which case a commuted sum in lieu of on-site provision will be required and secured in most cases via a Section 106 Agreement.	The Council expect to see the required affordable housing provision provided within the application site unless the applicant can demonstrate that either there are insufficient local needs existing to justify on-site provision <u>including circumstances where it is not possible to transfer the affordable housing provision to a Registered Provider (and reasonable endeavours have been used to do so for a 18 month period)</u> or there are overriding benefits by making alternative provision 'off-site', in which case a commuted sum in lieu of on-site provision will be required and secured in most cases via a Section 106 Agreement.
Page 20 Para 4.24	The level of payment in the form of a commuted sum will be based on the difference between the open market value for a similar size and type of property in the same area; and the transfer price paid by the Registered Provider. When calculating the appropriate commuted sum, the mix, ratio and type of dwellings will also be taken into account as if the units were to be provided on site to ensure that	The level of payment in the form of a commuted sum will be based on the difference between the open market value for a similar size and type of property in the same area; and the transfer price paid by the Registered Provider. When calculating the appropriate commuted sum, the mix, ratio and type of dwellings will also be taken into account as if the units were to be provided on site to ensure that this as far as possible accurately replicates the cost of

Page no. and paragraph no.	Current paragraph wording	Change (deleted text in strikethrough ; new text <u>underlined and bold</u> ; changes to diagrams, tables etc. described in <i>italic text</i>).
	this as far as possible accurately replicates the cost of provision on site.	provision on site. <u>The applicant will be expected to provide a calculation and evidence of how the commuted sum was derived based on an open market sales value for the type of properties with evidence to recent sales in the same housing market area. The phasing of financial contributions will be agreed on a site by site basis.</u>

Appendix B: Table of Changes for the draft Houses in Multiple Occupation SPD

Page no. and paragraph no.	Current paragraph wording	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 no. 1.6	The concentration and increase of HMOs is not just exclusive to St Helens. Many communities across the UK have seen similar trends. In response to this, other Local Authorities have set out a range of policy tools, utilising both housing and planning powers to tackle high concentrations of HMOs. One of the most typical has been through adoption of planning guidance, such as SPDs.	The concentration and increase of HMOs is not just exclusive to St Helens. Many communities across the UK have seen similar trends. <u>Nationally, there has been an increase in HMOs as a form of housing.</u> In response to this, other Local Authorities have set out a range of policy tools, utilising both housing and planning powers to tackle high concentrations of HMOs. One of the most typical has been through adoption of planning guidance, such as SPDs.
Page 5 Paragraph no. 1.10	Between April 2017 and February 2025, the Council have received 72 planning applications and certificate of lawfulness applications for HMO development. Of those applications, 55 have been approved, 6 refused, 8 withdrawn and 3 are pending consideration. The type of properties put forward for HMOs varies between terraced, semi-detached and detached dwellings, public houses and commercial buildings. The majority of planning applications and certificate of lawfulness applications are concentrated in Newton-le-Willows West, St Helens Town Centre, West Park and Windle wards across the Borough.	Between April 2017 and February <u>December</u> 2025, the Council have received <u>determined</u> 72 <u>62</u> planning applications and certificate of lawfulness applications for HMO development. Of those applications, 55 <u>47</u> have been approved, 6 <u>7</u> refused <u>and</u> 8 withdrawn and 3 are pending consideration. The type of properties put forward for HMOs varies between terraced, semi-detached and detached dwellings, public houses and commercial buildings. The majority of planning applications and certificate of lawfulness applications are concentrated in Newton-le-Willows West, St Helens Town Centre, West Park and Windle wards across the Borough.
Page 5 – foot note	As of 1 April 2025.	As of 1 April <u>4 December</u> 2025.

Page 10 Paragraph no. 3.3	In regard to step 2, it is important to emphasise that it may not always be possible to ascertain a complete and accurate record of all properties that have converted to HMOs as many properties may have been converted under permitted development rights. As such, the Council may not be aware of these HMOs and a licence is not required for those of less than 5 persons. The Council will only be able to apply this limit using the information that it has.	In regard to step 2, it is important to emphasise that it may not always be possible to ascertain a complete and accurate record of all properties that have converted to HMOs as many properties may have been converted under permitted development rights. As such, the Council may not be aware of these HMOs, and a licence is not required for those of less than 5 persons. The Council will only be able to apply this limit using the information that it has <u>available. The Council will consider other information available to them that concludes that a property is in use as a HMO, such as the advertising/marketing of properties (on websites such as Rightmove).</u>
Page 10 Paragraph no. 3.3	In regard to step 2, it is important to emphasise that it may not always be possible to ascertain a complete and accurate record of all properties that have converted to HMOs as many properties may have been converted under permitted development rights. As such, the Council may not be aware of these HMOs and a licence is not required for those of less than 5 persons. The Council will only be able to apply this limit using the information that it has available.	In regard to step 2, it is important to emphasise that it may not always be possible to ascertain a complete and accurate record of all properties that have converted to HMOs as many properties may have been converted under permitted development rights. As such, the Council may not be aware of these HMOs, and a licence is not required for those of less than 5 persons. The Council will only be able to apply this limit using the information that it has available. <u>The Council will consider other information available to them that concludes that a property is in use as a HMO, such as the advertising/marketing of properties (on websites such as Rightmove).</u>
Page 15 Paragraph no. 3.20	Proposals should optimise daylight and solar gain by the organisation and layout of fenestration. In most cases basements are unlikely to be considered acceptable for conversion to HMO accommodation although basements	Proposals should optimise daylight and solar gain by the organisation and layout of fenestration. In most cases basements are unlikely to be considered acceptable for conversion to HMO accommodation although basements

	can be used for bathrooms, storage, laundry rooms, bicycle storage or other uses. However, where this is proposed, it is particularly important that sufficient light penetration is achieved. If it is considered that the light levels within a scheme would be particularly low, further assessment will be required. One indicator of light penetration is the use of the 25-degree rule guide.	can be used for bathrooms, storage, laundry rooms, bicycle storage or other uses. However, where this is proposed, it is particularly important that sufficient light penetration is achieved. If it is considered that the light levels within a scheme would be particularly low, further assessment will be required. One indicator of light penetration is the use of the 25-degree rule guide. <u>Where the use of basements is proposed in Flood Zones 2 and/or 3, a Flood Risk Assessment will be required in accordance with guidance in the NPPF (Annex 3), as bringing additional occupants in or seeking to create habitable rooms in the basement may result in an increased risk of flooding. Advice should be sought from the Council in this respect. Floor plans should be provided to show the proposed use of basement areas.</u>
Page 17 Paragraph no. 3.27	The minimum requirement for amenity space for Houses in Multiple Occupation is 10m ² per occupant. However, it is appreciated that for larger HMOs this may not be achievable or even appropriate. Therefore, the amenity space for anything larger than a 10 person HMO will be capped at 100m ² .	The <u>suggested</u> minimum requirement for amenity space for Houses in Multiple Occupation is 10m ² per occupant. However, it is appreciated that for larger HMOs this may not be achievable or even appropriate. Therefore, the amenity space for anything larger than a 10 person HMO will be capped at 100m ² .
Pages 18 and 19 Paragraph no. 3.37	HMOs and shared housing tend to attract occupiers with lower-than-average levels of car ownership compared to the general population. Furthermore, car ownership in the Borough is significantly low, with only 46% of the population within the St Helens Town Centre owning a car, and therefore there is less reliance on car usage.	HMOs and shared housing tend to attract occupiers with lower-than-average levels of car ownership compared to the general population. Furthermore, car ownership in the Borough is significantly low, with only 46% of the population within the St Helens Town Centre owning a car, and therefore there is less reliance on car usage. <u>with car ownership data⁶ from the Office for National Statistics (ONS) showing that 23% of all residents in St Helens</u>

		<u>do not have access to a car and within St Helens the breakdown of car ownership by tenure, based on Census data for 2021⁷, shows that 57% of residents of flats/apartments etc did not have access to a vehicle (this included all residents, both homeowners and those renting). Therefore, information available shows there is less reliance on car usage within the Borough.</u>
Page 19 Paragraph no. 3.38	Many HMOs are conversions of existing properties with differing existing parking provisions, accessibility levels and other location specific services often restricted. Therefore, it is not possible to have a 'one size fits all' approach to parking that is suitable for all HMOs.	Many HMOs are conversions of existing properties with differing existing parking provisions, accessibility levels and other location specific services often restricted. Therefore, it is not possible to have a 'one size fits all' approach to parking that is suitable for all HMOs. <u>It is important that the existing demand for car parking close to a proposed HMO is considered, together with the availability of nearby public transport services.</u>
Page 19 Paragraph no. 3.39 <i>(new paragraph inserted)</i>	New paragraph inserted after paragraph no. 3.38. Paragraph numbers from 3.39 to 3.43 have therefore been updated accordingly.	<u>Where the parking standards requirement for car parking as set out in table below cannot be provided off-street, applicants should carry out a Minimum Accessibility Standard Assessment (MASA) in accordance with Chapter 7 of the Council's Transport and Travel SPD and should demonstrate the availability of on street parking by providing thorough parking beat surveys. These should be carried out by an independent survey company, in accordance with the Lambeth methodology⁸ which provides guidance on the time and extent of the observations to be included. A snapshot parking beat survey should be undertaken on two separate weekday nights (Monday to Thursday inclusive) between 00.30 and 05.30 over an area within a walking distance of 200m from the</u>

		<u>application address. Further details of the area to be considered are included within the guidance together with the information that should be presented.</u>
Page 19 – foot notes added	N/A	<p>⁶ <u>Office for National Statistics “Car or Van availability” Census 2021 Car or van availability - Office for National Statistics</u></p> <p>⁷ <u>Office for National Statistics “Table A47” Census 2021 Percentage of households with cars by income group, tenure and household composition: Table A47 - Office for National Statistics</u></p> <p>⁸ <u>Lambeth Council “Parking Survey Guidance Note” 2021 LAMBETH TRANSPORT PARKING SURVEY METHODOLOGY</u></p>
Pages 20 and 21	N/A	<i>Table detailing parking space requirements and plan showing parking zones within the Borough added after paragraph 3.39.</i>

No. of bedrooms	Maximum number of parking spaces for HMO properties, by location			
	Zone A: Town Centre and Central Spatial Area	Zone B: Key Towns & Other Settlements	Zone C: Villages & Parishes	Zone D: Rural
2	0	1	1	2
3	1	2	2	3
4	1	2	3	4
5	1	3	4	5
6	2	3	4	6
7	2	4	5	7
8	2	4	6	8
9	3	5	7	9
10	3	5	7	10
11	3	6	8	11
12*	4	6	9	12

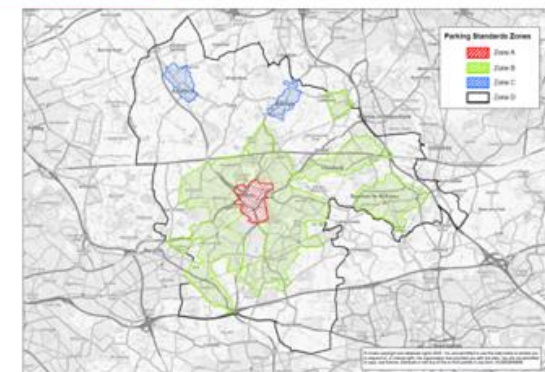
* Proposals providing over 12 bedrooms should be discussed with the Local Highway Authority prior to the submission of an application to establish the number of parking spaces required.

The geometry of the parking spaces should be in line with guidance in Table 36 of the Transport and Travel SPD, noting that all spaces should be independent and tandem spaces which result in blocking/double parking would not be permitted.

Blue Badge Parking 6% of the number of beds or 3 spaces, whichever is greater. *Further considerations to be negotiated on a case-by-case basis; where lettable rooms are designed for disabled access, disabled parking should be provided at a ratio of 1 space per room.*

EV Charging All parking spaces should have active EV charging facilities

Bicycles 1 secure covered space per bedroom to be provided at ground floor level in a secure and covered store in compliance with LTN 1/20⁹.



Page 20 – foot note added	N/A	⁹ <u>Cycle infrastructure design (LTN 1/20) - Cycle Infrastructure Design</u>
Page 21 Paragraph no. 3.39 <i>(updated to paragraph no. 3.40)</i>	To reduce parking pressures on the street, provision for parking within the property curtilage should be provided if possible and appropriate. However, the Local Plan is clear that HMOs should avoid harming the character or appearance of the area for example by leading to excessive hard surfacing of garden areas to form car parking. Therefore, the replacement of traditional front gardens with open hard standing and the removal of front and side boundary walls will be resisted. Removal of these elements can negatively impact on existing character of the street and, in some cases, exacerbate localised flooding.	To reduce parking pressures on the street, provision for parking within the property curtilage should be provided if possible and appropriate. However, the The Local Plan is clear that HMOs should avoid harming the character or appearance of the area for example by leading to excessive hard surfacing of garden areas to form car parking. Therefore, the replacement of traditional front gardens with open hard standing and the removal of front and side boundary walls will be resisted. Removal of these elements can negatively impact on existing character of the street and, in some cases, exacerbate localised flooding.
Page 21 Paragraph no. 3.40 <i>(updated to paragraph no. 3.41)</i>	All applicants for HMOs should set out the parking provision that is proposed as part of their scheme at the planning application stage. The appropriate level of parking provision will need to be agreed with the Council's Transport Development Control Team based upon: <ul style="list-style-type: none"> • The availability and suitability of parking within the curtilage of the property. • The sustainability of the site in relation to services and amenities. • The availability of public transport and access to bus stops and cycle routes. • The availability of existing parking provision in the surrounding locality. 	All applicants for HMOs should set out the parking provision that is proposed as part of their scheme at the planning application stage. The appropriate level of parking provision will need to be agreed with the Council's Transport Development Control Team <u>highways team</u> based upon: <ul style="list-style-type: none"> • The availability and suitability of parking within the curtilage of the property, <u>and / or a Minimum Accessibility Standard Assessment (MASA) and Beats Survey if required.</u> • The sustainability of the site in relation to services and amenities. • The availability of public transport and access to bus stops and cycle routes.

	<ul style="list-style-type: none"> • Parking demand compared to the use of the building as a standard residential property. 	<ul style="list-style-type: none"> • The availability of existing parking provision in the surrounding locality. • Parking demand compared to the use of the building as a standard residential property.
Page 21 Paragraph no. 3.42	Additional information on car parking provision for HMO's is available in the Transport and Travel SPD (2024).	Additional information on car parking provision for HMO's is available in the Transport and Travel SPD (2024).
Page 22 Paragraph no. 3.43	<p>The Council will require the submission of a Management Plan as part of the planning application process. The agreed Management Plan will need to be adhered to by the landlord, and the use of the property as an HMO implemented in accordance with the agreed details. The Management Plan will be expected to cover matters such as:</p> <ul style="list-style-type: none"> • Arrangements for the management and maintenance of all communal areas within the site and the building. • Methods to be deployed by the landlord to address and prohibit any potential nuisance or annoyance caused by tenants. • Management proposals for the servicing, storage, transfer and collection of waste and recycling ensuring that appropriate arrangements are made. • If appropriate, how adequate parking and cycling storage will be provided on site. 	<p>The Council will require the submission of a Management Plan as part of the planning application process. The agreed Management Plan will need to be adhered to by the landlord, and the use of the property as an HMO implemented in accordance with the agreed details. The Management Plan will be expected to cover matters such as:</p> <ul style="list-style-type: none"> • Arrangements for the management and maintenance of all communal areas within the site and the building. • Methods to be deployed by the landlord to address and prohibit any potential nuisance or annoyance caused by tenants. • Management proposals for the servicing, storage, transfer and collection of waste and recycling ensuring that appropriate arrangements are made. • If appropriate, how adequate parking and cycling storage will be provided on site.

		<ul style="list-style-type: none"> • <u>Details of an on-site person/s should any complaints arise, including their name and contact details, and details of a complaint's procedure.</u>
Pages 22 Paragraph no. 3.46	In addition to the above, an Employment and Skills Statement will also be required for new build HMOs of 10 or more rooms.	In addition to the above, an Employment and Skills Statement will also be required for new build HMOs of 10 or more rooms.
Page 23 Paragraph no. 3.47	Applicants must complete the template located in Appendix D of the Local Economy and Social Value SPD and submit this with their application. This provides all the key background factual information associated with the development. The Statement should take account of all sub-contractors and suppliers that are part of the development and be a means of monitoring the impact of each development on residents and local business.	Applicants must complete the template located in Appendix D of the Local Economy and Social Value SPD and submit this with their application. This provides all the key background factual information associated with the development. The Statement should take account of all sub-contractors and suppliers that are part of the development and be a means of monitoring the impact of each development on residents and local business.
Page 23 Paragraph no. 3.48	The scope of the statement and measures proposed should be proportionate to the scale of the development and be individually tailored to ensure that the skills and employment opportunities are provided at the right time to benefit both the developer and local residents. Early engagement with the Council's Employment and Skills Team is recommended.	The scope of the statement and measures proposed should be proportionate to the scale of the development and be individually tailored to ensure that the skills and employment opportunities are provided at the right time to benefit both the developer and local residents. Early engagement with the Council's Employment and Skills Team is recommended.
Pages 23 and 24 Paragraph no. 4.3	Applications will need to be accompanied by the relevant supporting evidence. This will include, but is not limited to: <ul style="list-style-type: none"> • A site location plan. • Internal layout / floor plans showing: 	Applications will need to be accompanied by the relevant supporting evidence. This will include, but is not limited to: <ul style="list-style-type: none"> • A site location plan. • Internal layout / floor plans showing:

	<ul style="list-style-type: none"> ○ The internal measurements for each room (bedrooms and communal spaces) indicating what each room will be used for. ○ For bedrooms, indicate if they are intended to be single or double, and any areas of reduced ceiling heights. ● External layout plans showing the location, size and design of the: <ul style="list-style-type: none"> ○ Waste storage area to be used for the storage of waste and recycling bins. ○ Outdoor amenity space. ○ Areas for drying clothes. ○ Bicycle parking and storage. ○ Car parking (if on site). ● Elevation plans where any extensions or new opening such as windows and doors are proposed. ● Supporting statement including details of proposed parking provision (car and bicycle). ● A Management Plan. ● Any supporting evidence such as pre-application discussions and consultations with the local community and neighbouring residents. ● Where appropriate, a Local Employment and Skills Statement. 	<ul style="list-style-type: none"> ○ The internal measurements for each room (bedrooms and communal spaces) indicating what each room will be used for. ○ For bedrooms, indicate if they are intended to be single or double, and any areas of reduced ceiling heights. ● External layout plans showing the location, size and design of the: <ul style="list-style-type: none"> ○ Waste storage area to be used for the storage of waste and recycling bins. ○ Outdoor amenity space. ○ Areas for drying clothes. ○ Bicycle parking and storage. ○ Car parking (if on site). ● Elevation plans where any extensions or new opening such as windows and doors are proposed. ● Supporting statement including details of proposed parking provision (car and bicycle) <u>and/or a Minimum Accessibility Standard Assessment (MASA) and Beats Survey if required.</u> ● A Management Plan. ● Any supporting evidence such as pre-application discussions and consultations with the local community and neighbouring residents. ● Where appropriate, a Local Employment and Skills Statement.
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Appendix C: Table of Changes for the draft Local Economy and Social Value SPD

Page no. and paragraph no.	Current paragraph wording	Change (deleted text in strikethrough ; new text underlined and bold ; changes to diagrams, tables etc. described in <i>italic</i> text).
Page 14 Para 2.26 <i>(new paragraph inserted)</i>	N/A	<u>The Mersey Forest – Our Plan</u> <u>The Mersey Forest Plan is the long-term strategic guide extending to 2050 and beyond.</u>
Page 14 Para 2.27 <i>(new paragraph inserted)</i>	N/A	<u>It includes their vision and key principles, organised under the headings Why, What, Who, How, and Where. The Where principles also include area-specific spatial principles. The When aspects are covered by their Delivery Plan, which sets out targets and programmes of work over a shorter 5 year period. The ongoing delivery and impact of The Mersey Forest Plan is showcased throughout their website, and in particular on the “our impact” and “our work” pages. The 2025 version is the fourth iteration of The Mersey Forest Plan.</u>
Page 15 Para 2.25	LCRCA – Local Growth Plan (Emerging) 2.25 The LGP will set the blueprint for realising a long-term vision to transform LCR’s economy, maximise its contribution to UK growth, and unlock global potential.	LCRCA – Local Growth Plan (Emerging) 2.25 The LGP will sets the blueprint for realising a long-term vision to transform LCR’s economy, maximise its contribution to UK growth, and unlock global potential.
Page 21 Para 3.18	Prior to the Council’s agreement to such a change of use, a viability assessment should be submitted, containing the	Prior to the Council’s agreement to such a change of use, if the applicant is justifying the change of use on

Page no. and paragraph no.	Current paragraph wording	Change (deleted text in strikethrough ; new text <u>underlined and bold</u> ; changes to diagrams, tables etc. described in <i>italic</i> text).
	evidence as set out in Appendix C. The assessment will need to consider the differences between the value of the site based on its current use, the viability of re-using, reconfiguring or redeveloping the site for E(g), B2 or B8 uses and also for other employment generating uses typically found on employment/industrial estates, (i.e., the difference between the cost of doing this and the end value) and the viability of redeveloping the site for the applicant's preferred use.	viability grounds a viability assessment should be submitted, containing the evidence as set out in Appendix C. The assessment will need to consider the differences between the value of the site based on its current use, the viability of re-using, reconfiguring or redeveloping the site for E(g), B2 or B8 uses and also for other employment generating uses typically found on employment/industrial estates, (i.e., the difference between the cost of doing this and the end value) and the viability of redeveloping the site for the applicant's preferred use.
Page 29 Para 3.35	Flood Risk – Tourism and leisure developments could include camp and glamping sites, barn conversions for holiday lets, wedding venues with overnight accommodation etc., which are considered to be highly vulnerable development. Therefore, new development should be directed away from those areas which are at high risk of flooding.	Flood Risk – Tourism and leisure developments could include camp and glamping sites, barn conversions for holiday lets, wedding venues with overnight accommodation etc., which are considered to be <u>more</u> highly vulnerable development. Therefore, new development should be directed away from those areas which are at high risk of flooding.
Page 30 Table 3.2 <i>(note added below table 3.2 and relevant uses given an *)</i>	N/A	<u>*These requirements apply to both new build schemes and conversions/changes of use.</u>

Appendix D: Table of Changes for the draft Locally Listed Heritage Assets SPD

Page no. and paragraph no.	Current paragraph wording	Change (deleted text in strikethrough ; new text <u>underlined and bold</u> ; changes to diagrams, tables etc. described in <i>italic</i> text).
Page 8 Para 4.1	A local heritage list is a locally designated register of buildings and structures of historical and architectural interest, which are considered to be of significance to the local community and which contribute to the local environment, as well as social and cultural heritage.	A local heritage list is a locally designated register of buildings and structures of historical, <u>archaeological</u> , and architectural interest, which are considered to be of significance to the local community and which contribute to the local environment, as well as social and cultural heritage.
Page 8 Para 4.4	The difference between the 'statutory list' and a local heritage list is in the level of control. Any works, which affect the character and/or setting of a listed building, requires Listed Building Consent, with some works within the curtilage of a listed building also requiring planning permission. The control of works to a building or structure on the local heritage list is very limited with protection conferred through the development control process.	The difference between the 'statutory list' and a local heritage list is in the level of control. Any works, which affect the character and/or setting <u>or appearance</u> of a listed building, requires Listed Building Consent, with some works within the curtilage of a listed building also requiring planning permission. The control of works to a building or structure on the local heritage list is very limited with protection conferred through the development control process.
Page 9 Para 4.6	Under current legislation, the inclusion of a building or structure on the local heritage list does not change the existing planning controls that already apply to these buildings, including their demolition or significant/unsympathetic alteration. Inclusion on the local heritage list is not primarily intended to restrict development but will seek to ensure that any proposals	Under current legislation, the inclusion of a building or structure on the local heritage list does not change the existing planning controls that already apply to these buildings, including their demolition or significant/unsympathetic alteration . Inclusion on the local heritage list is not primarily intended to restrict development but will seek to ensure that any proposals

Page no. and paragraph no.	Current paragraph wording	Change (deleted text in strikethrough ; new text <u>underlined and bold</u> ; changes to diagrams, tables etc. described in <i>italic</i> text).
	take into consideration the local significance of the building or structure.	take into consideration the local significance of the building or structure.
Page 9 Para 4.7	Consideration to alter or demolish buildings/structures on the local heritage list can only be determined if such proposals require or are associated with an application for planning permission. Permitted development rights are not affected by the designation and inclusion in the list does not afford any additional statutory protection. Where a heritage asset on the local heritage list is within a conservation area or subject to an Article 4 Direction6, there are additional planning controls already in place.	Consideration to alter or demolish buildings/structures on the local heritage list can only be determined if such proposals require or are associated with an application for planning permission. Permitted development rights are not affected by the designation and inclusion in the list does not afford any additional statutory protection. <u>Inclusion on the local list does not affect permitted development rights or provide statutory protection.</u> Where a heritage asset on the local heritage list is within a conservation area or subject to an Article 4 Direction6, there are additional planning controls already in place.
Page 12 Para 5.2	With regards to statutory listing, buildings/structures are assessed against national standards and criteria set out by English Heritage. The local heritage list follows similar criteria with emphasis being on the contribution a building or structure makes to the character of an area and its value to local people.	With regards to statutory listing, buildings/structures are assessed against national standards and criteria set out by English Heritage <u>Historic England</u> . The local heritage list follows similar criteria with emphasis being on the contribution a building or structure makes to the character of an area and its value to local people.
Page 15 Para 6.1	Inclusion on the local heritage list is not primarily intended to restrict development but will seek to ensure that any proposals take into consideration the local significance of the building or structure. Consideration to alter or demolish buildings/structures on the local heritage list can only be determined if such proposals require or are associated with an application for planning permission. Permitted	Inclusion on the local heritage list is not primarily intended to restrict development but will seek to ensure that any proposals take into consideration the local significance of the building or structure. Consideration to alter or demolish buildings/structures on the local heritage list can only be determined if such proposals require or are associated with an application for planning permission. Permitted

Page no. and paragraph no.	Current paragraph wording	Change (deleted text in strikethrough ; new text <u>underlined and bold</u> ; changes to diagrams, tables etc. described in <i>italic</i> text).
	development rights are not affected by this designation, and inclusion in the list does not afford any additional statutory protection.	development rights are not affected by this designation, and inclusion in the list does not afford any additional statutory protection. <u>Inclusion on the local list does not affect permitted development rights or provide statutory protection.</u>
Page 16 Para 6.5	Inclusion of buildings and structures of local historic or architectural significance onto a local heritage list would increase their importance and provide some evidence in trying to protect them from demolition and insensitive alterations, thereby maintaining the character and appearance of the area for future generations.	Inclusion of buildings and structures of local historic or architectural significance onto a local heritage list would increase their importance <u>formally recognise their local historic or architectural significance.</u> and provide some evidence in trying to protect them from demolition and insensitive alterations <u>This ensures that their significance is taken into account in planning decisions and strengthens the case for their protection from demolition and inappropriate changes that would harm their significance,</u> thereby maintaining the character and appearance of the area for future generations.
Page 16 Para 6.8	Apart from these constraints, unlisted buildings in conservation areas are afforded little protection from unsympathetic alterations.	Apart from these constraints, unlisted buildings in conservation areas are afforded little protection from unsympathetic alterations. <u>Unlisted buildings in conservation areas are not afforded any additional protection beyond the specific constraints already outlined.</u>
Page 16 Para 6.9	The Council has however issued a number of Article 4 Directions ⁸ on residential properties in the majority of the borough's conservation areas to manage/resist alterations	The Council has however issued a number of Article 4 Directions ⁸ on residential properties in the majority of the borough's conservation areas to manage/resist alterations

Page no. and paragraph no.	Current paragraph wording	Change (deleted text in strikethrough ; new text <u>underlined and bold</u> ; changes to diagrams, tables etc. described in <i>italic</i> text).
	that affect public views of the area, such as extensions, installation of UPVC windows and doors, removal of front garden walls, creation of hard-standing for cars and the installation of satellite dishes/antennae and photovoltaics. Copies of these Article 4 Directions' can be viewed on the Council's website.	that affect public views of the area, such as extensions, installation of UPVC windows and doors, removal of front garden walls, creation of hard-standing for cars and the installation of satellite dishes/antennae and photovoltaics. Copies of these Article 4 Directions' can be viewed on the Council's website.
Page 18 Para 6.18 <i>(new paragraph inserted, and subsequent paragraph numbers updated)</i>	N/A	<u>Retention and reuse are preferred approaches that recognize the contribution of a building/structure to local character. The Council encourages applicants to explore creative and sympathetic solutions that retain and adapt locally listed buildings/structures for new uses.</u>
Page 19 Para 6.19 <i>(updated to para no. 6.20)</i>	Proposals for demolition or substantial demolition of a building or structure on the local heritage list must normally demonstrate clear and convincing evidence that the asset is no longer of local importance, that it is beyond repair, restoration or reuse, or that the proposed redevelopment would produce substantial public benefit which would decisively outweigh the loss resulting from demolition. Redevelopment proposals for buildings/structure on the local heritage list should consider how they can be incorporated into the development and their significance revealed rather than being demolished.	Proposals for demolition or substantial demolition of a building or structure on the local heritage list must normally demonstrate clear and convincing evidence that the asset is no longer of local importance, that it is beyond repair, restoration or reuse, or that the proposed redevelopment would produce substantial public benefits which would decisively outweigh the loss resulting from demolition. Redevelopment proposals for buildings/structure on the local heritage list should consider how they can be incorporated into the development and their significance revealed rather than being demolished.

Page no. and paragraph no.	Current paragraph wording	Change (deleted text in strikethrough ; new text <u>underlined and bold</u> ; changes to diagrams, tables etc. described in <i>italic</i> text).
Page 21 Para 7.10	All buildings and structures identified added to the local heritage list will be plotted onto electronic (GIS) map layers used for development management purposes.	All buildings and structures identified added to the local heritage list will be plotted onto electronic (GIS) map layers used for development management purposes <u>for use in planning decisions.</u>