

2018 Supplementary Planning Document consultation

Consultation statement – Flats and Houses in Multiple Occupation SPD (2018)

The Council consulted statutory and other consultees on the draft Flats and Houses in Multiple Occupation (HMOs) SPD in line with the approved Statement of Community Involvement (<https://www.sefton.gov.uk/sci>). The consultation period ran from mid-February to 13th April 2018.

A total of 3 comments were received:

- Natural England
- CPRE
- Merseyside Police.

Consultee	Summary of comment	Response
Natural England	This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD , which advises (amongst other matters) a ratio of one nest/roost box per residential unit.	This is beyond the remit of this SPD. The Local Plan contains policies [including Policy NH2] that seek to mitigate any impact of development on nature. This is SPD is primarily concerned with the conversion of properties to flats and HMOs and design room/garden size standards to ensure residential amenity is protected.
Natural England	The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.	
Natural England	Natural England has produced Standing Advice to help local planning authorities assess the impact of particular developments on protected or priority species.	
Natural England	A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here . While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic	The SPD updates an existing SPD and is not considered to give rise to significant environmental impacts. The SPD in itself will not provide a basis for permitting

Consultee	Summary of comment	Response
	Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.	new build development, rather it will set out size standards for room/gardens sizes. An SEA or HRA is not required.
CPRE	Par.30.and Par.64: Change“...is intended” to “...should be designed”.	Agree. Change will be made
CPRE	Par.30 and 64: Add to list “...gardening, growing space”.	Agree. Change will be made
CPRE	Par.54: Insert additional sentence: “Window Design which allows for an area of outdoor growing space such as an integral window box, is encouraged.”	Do not agree. HMOs will only be permitted through conversions and therefore existing windows will be utilised.
CPRE	Local Plan Policy ‘EQ4’ refers to external lighting as a pollution hazard and thus all SPD’s concerning future development should detail the Council’s requirements if this hazard is to be reduced. CPRE would like to recommend the following documents as being relevant in the development of detailed lighting policy: ‘Lighting in the Countryside: Towards Good Practice (Local Government and the Countryside Commission,1997)’, ‘Nightblight (CPRE,2016)’, ‘Shedding Light, a survey of Local Authority approaches to lighting in England(CPRE,2014)’.	Noted. However this is considered be beyond the scope of this SPD.
Merseyside Police	<p>Please consider a section in the document entitled something along the lines of ‘Security and Protection’, within this I advise:</p> <ul style="list-style-type: none"> • Dusk to dawn lighting on a photoelectrical switch for: <ul style="list-style-type: none"> ○ outdoor amenity space ○ communal entrances ○ landings ○ bin stores (so that residents feel safe putting out rubbish when its dark) • Flat door sets to be entrenched in a robust frame with a PAS24:2016 door, this must include a TS007 3*diamond cylinder which is resistant to snapping and bumping- a basic euro profile cylinder can easily be attacked to gain entry in seconds • To eliminate the risks associated with mail delivery I advocate a bank of mail boxes to TS009 standard, this will mitigate against arson, fishing for personal mail, this should be located by the primary entrance /exit to the building 	These issues are beyond the scope of planning.