

Consultation Statement

This consultation statement has been prepared in accordance with Regulation 17(1)(b) of the Town and Country Planning (Local Development)(England) Regulations 2004 and the Statement of Community Involvement.

Pre-production Consultation

Methods of consultation

The draft document was informed by methods of consultation including:

- A working group which was set up with service providers from teams within the council including; environment, planning, housing and community, and public health and protection.
- A meeting with representatives of the University of Hertfordshire.
- A workshop held with local councillors from Welwyn Hatfield Borough Council and Hatfield Town Council.

Who was consulted

The draft document was informed by consultation including with:

- Service providers from teams within Welwyn Hatfield Borough Council.
- Representatives of the University of Hertfordshire.
- Local councillors from Welwyn Hatfield Borough Council.
- Local councillors from Hatfield Town Council.

Summary of the main issues raised

The following issues were raised:

- The concentration of houses in multiple occupation;
- Car parking concerns;
- Provision for waste and recycling at properties;
- Bicycle parking;
- The provision of gardens;
- Access; and
- Internal layout including space standards and a communal room.

How these issues have been addressed in the draft SPD

The comments raised as part of the pre-production consultation have informed the approach taken in the draft Houses in Multiple Occupation Supplementary Planning Document. The document includes:

- A criterion relating to concentration of Houses in Multiple Occupation.

- A criterion relating to the provision of car parking.
- A criterion relating to provision of storage for bicycles.
- A criterion setting out the requirements for waste and recycling storage and collection.
- A criterion relating to layout and design including; the garden, drying area, entrance and internal layout standards.

Consultation on the Draft SPD

Methods of consultation

Consultation on the draft Houses in Multiple Occupation Supplementary Planning Document took place for five weeks from 21 September to 25 October 2011.

During the consultation period the document was available to view and comment on online at www.welhat.gov.uk. There was a link to the consultation from the home page of the council's website. Facebook and Twitter were used to promote the consultation.

The document was also available to view during normal office hours at the following locations; Hatfield Library, Hatfield Town Council Offices, Jim McDonald Centre, Welwyn Garden City Library and Welwyn Hatfield Borough Council Offices.

A paper leaflet with pull out questionnaire was also produced.

The consultation was promoted in the Hatfield Town Council Newsletter/Magazine.

Estate Agents, Letting Agents and Solicitors were sent an email or letter with a leaflet including a pull out questionnaire.

The Landlords Forum were sent an email or letter with a leaflet including a pull out questionnaire and an invitation to attend the next Landlords Forum.

The Welwyn Hatfield Borough Panel were sent an email or letter with a leaflet including a pull out questionnaire. The Borough Panel were also sent a newsletter which included information about this consultation.

A presentation about the draft Houses in Multiple Occupation Supplementary Planning Document and the consultation was given to the Landlords Forum on 3 October 2011.

A presentation about the draft Houses in Multiple Occupation Supplementary Planning Document and the consultation was given to the Planning Agents Forum on 11 October 2011.

A meeting took place with a representative of the University of Hertfordshire.

A colour advertisement was put in the Welwyn Hatfield Times on 21 September 2011.

Your views needed on the draft Houses in Multiple Occupation document

Welwyn Hatfield Borough Council is consulting on the draft Houses in Multiple Occupation Supplementary Planning Document (SPD).

The draft SPD sets out the council's approach to planning applications for Houses in Multiple Occupation. It is available to view and comment on at: www.welhat.gov.uk/hmo.

The draft document is also available to view at:
 Hatfield Library, Hatfield Town Council Offices, Jim McDonald Centre,
 Welwyn Garden City Library, Welwyn Hatfield Borough Council Offices

Consultation will run from **Wednesday 21 September** until **Tuesday 25 October 2011**.

LDF www.welhat.gov.uk

WELWYN HATFIELD
BOROUGH COUNCIL

A statutory notice was put in the Welwyn Hatfield Times on 21 September 2011.

Welwyn Hatfield Borough Council
 The Planning and Compulsory Purchase Act 2004
 The Town and Country Planning (Local Development) (England) Regulations 2004

Draft Houses in Multiple Occupation Supplementary Planning Document
Public Consultation: 21 September 2011 to 25 October 2011

Welwyn Hatfield Borough Council has published the draft Houses in Multiple Occupation Supplementary Planning Document (SPD) for public consultation. The draft SPD sets out the Council's proposed approach to planning applications for Houses in Multiple Occupation.

The Supplementary Planning Document relates to the subject of Houses in Multiple Occupation and covers the area of the Borough of Welwyn Hatfield.

The document can be viewed online at www.welhat.gov.uk, or at the following locations:

Hatfield Library, Queensway, Hatfield, AL10 0LT, between the hours of 2pm and 7pm (Mon and Thurs), 9am and 7pm (Tues and Wed), 9am and 4pm (Sat), closed (Fri and Sun).

Hatfield Town Council Offices, Birchwood Leisure Centre, Longmead, Hatfield, AL10 0AN, between the hours of 9am and 5pm Monday to Friday.

Jim McDonald Centre, 3 McDonald Court, High View, Hatfield, AL10 8HR, between the hours of 9am and 4pm Monday to Friday.

Welwyn Garden City Library, Campus West, Welwyn Garden City, AL8 6AJ, between the hours of 9am and 7pm (Mon, Tues and Thurs), 2pm and 7pm (Wed and Fri), 9am and 4pm (Sat), 1pm and 5pm (Sun).

Welwyn Hatfield Borough Council Offices, The Campus, Welwyn Garden City, AL8 6AE, between the hours of 8.45am and 5.15pm Monday to Thursday and 8.45am and 4.45pm Friday.

You can submit written comments on the draft document to the following:
Online at <http://consult.welhat.gov.uk/portal>
email to planningpolicy@welhat.gov.uk
Post to Planning Policy Team, Welwyn Hatfield Borough Council, The Campus, Welwyn Garden City, AL8 6AE.

Any representations may be accompanied by a request to be notified at a specified address of the adoption of the SPD. The deadline for the receipt of all representations is 5pm on Tuesday 25 October 2011.

For further information please contact the Planning Policy Team on 01707 357539 or email planningpolicy@welhat.gov.uk.

Welwyn Hatfield Borough Council made a press release. The Welwyn Hatfield Times also ran an editorial piece on 21 September 2011.

Chance to shape planning rules for multi-occupant housing

RESIDENTS' views on how Welwyn Hatfield Council deals with planning applications for properties like student digs are being sought.

A public consultation opens today (Wednesday) on a draft document setting out the council's proposed approach relating to Houses in Multiple Occupation (HMOs).

New legislation coming into force in January means the local authority will have increased planning powers relating to HMOs.

The issue most affects Hatfield, due to the large volume of student accommodation, and a special regulation covering the university town will mean change of use planning permission would be required for houses

with three to six occupants.

Large HMOs – those with more than six people sharing – already require planning permission.

The draft document being consulted on sets out criteria for determining planning applications, which includes assessing the number of HMOs in any one area, as well as car and bicycle parking, waste and recycling.

Cllr Mandy Perkins, executive member for planning and business, said: "A recent change in Government planning rules presented an opportunity to improve living standards for our residents.

"An increase in current planning powers means that we will be better

able to respond to residents' concerns while at the same time improving the quality of local accommodation."

She added: "Welwyn Hatfield has a high concentration of HMOs which provide accommodation for professionals and students alike.

"We want residents to get involved and have a say on how we determine planning applications for such housing in the future."

Download the consultation document online at www.welhat.gov.uk/hmo

Hard copies can also be viewed at WGC and Hatfield libraries, borough and town council offices, and at the Jim McDonald Centre in Hatfield.

The consultation runs until October 25.

Welwyn Hatfield Times Page 11

Posters were displayed to promote the consultation on community notice boards and at the deposit locations.



Your views needed on the draft Houses in Multiple Occupation document

Welwyn Hatfield Borough Council is consulting on the draft Houses in Multiple Occupation Supplementary Planning Document (SPD). Consultation will run from Wednesday 21 September until Tuesday 25 October 2011.

The draft SPD sets out the council's approach to planning applications for Houses in Multiple Occupation. It is available to view and comment on at: www.welhat.gov.uk/hmo.

The draft document is also available to view at:

- Hatfield Library, Queensway, Hatfield
- Hatfield Town Council Offices, Birchwood Leisure Centre, Longmead, Hatfield
- Jim McDonald Centre, 3 McDonald Court, High View, Hatfield
- Welwyn Garden City Library, Campus West, Welwyn Garden City
- Welwyn Hatfield Borough Council Offices, The Campus, Welwyn Garden City.

We are also presently consulting on our [draft Planning Obligations SPD](#). More information about this, as well as the opportunity to view and comment, is available online at www.welhat.gov.uk. The document is also available to view at the locations listed above.

If you have any questions please contact the Planning Policy Department on **01707 357539**.

LDF

www.welhat.gov.uk

**WELWYN
HATFIELD**
BOROUGH COUNCIL



Who was consulted

In accordance with Regulation 17(1)(b) of the Town and Country Planning (Local Development)(England) Regulations 2004, specific consultation bodies and general consultation bodies were consulted.

The document was informed by consultation, including with:

- English Heritage
- Environment Agency
- Estate Agents, Letting Agents and Solicitors
- Hertfordshire County Council
- Highways Agency
- Homes and Communities Agency
- Landlords Forum run by Welwyn Hatfield Borough Council
- Local councillors from Hatfield Town Council
- Local councillors from Welwyn Hatfield Borough Council
- Members of the Borough Panel
- National HMO lobby
- National Landlords Association
- Planning Agents Forum run by Welwyn Hatfield Borough Council
- Residential Landlords Association
- Royal Veterinary College
- Students Union at the University of Hertfordshire
- University of Hertfordshire
- Various residents associations
- YMCA
- Guinness Partnership
- Welwyn Community Housing Trust
- Hatfield Townswomans Guild
- Women's Institute
- Handside Women's Institute
- Digswell WI
- Northaw & Cuffley WI
- MENTER (Polish Forum)
- Kaleidoscope Enterprise Limited
- Welwyn Hatfield Interfaith Group
- Jehovah's Witnesses
- Welwyn Hatfield Islamic Society
- St Albans Diocese
- WGC Rotary Club & Anglian Churches
- WGC Central Congregation of Jehovah's Witnesses
- St. Michael's Church
- St. Johns Church, Hilltop
- Panshanger Church Centre
- Welwyn Hatfield Access Group
- Hertfordshire Action on Disability
- Herts Society for the Blind
- BEAMS

- Federation of Small Businesses
- Southside Traders Association
- Welwyn Hatfield Chamber of Commerce
- Circle Anglia
- Business Link East
- Hornbeams Society
- Romany Institute
- Showmens Guild of Great Britain
- WGC Chamber of Commerce & Trade
- Various parish and town councils
- Various district and borough councils
- Coal Authority
- Natural England
- Department for Transport
- Thames Water Property Services
- Veolia Water Central
- UK Power Networks
- East of England Development Agency
- Hertfordshire Police Authority
- East of England Regional Assembly
- East and North Herts NHS Trust
- Hertfordshire PCT
- National Grid

In addition, an email was sent to everyone on the council's consultation database informing them that the SPD was available for comment.

A total of 40 people responded to the consultation and made 190 comments.

Summary of amendments to the SPD:

A number of amendments have been made to the Houses in Multiple Occupation Supplementary Planning Document to reflect the comments raised as part of the statutory consultation process and these are set out below:

Glossary

- Some definitions have been updated to make it clearer for the reader. Three new definitions have been added for; basic amenities, house in multiple occupation and self contained unit of accommodation.

1. Introduction

- Paragraph 1.3 has been updated to include signposting to other sections within the document. Paragraph 1.5 has been deleted now that the public consultation has been completed.

- The objectives have updated. A new objective has been included to reflect the response from the Environment Agency. The wording of two objectives has been updated to better reflect PPS3. The objective relating to infrastructure has been deleted and information included in section 5 under the heading Planning obligations and CIL.
- Numerical figures have been updated where new information is available.
- Paragraph 1.18 now refers to surrounding residents rather than neighbouring residents for consistency.
- Paragraph 1.19 has been updated to include a reference to on street parking.

2. Hatfield Article 4 Direction

- The tense has been updated to reflect that the Article 4 Direction will have come into effect. The wording has been updated to refer to the permitted development right.

3. Is Planning Permission Required?

- A new section heading has been included, 3.2 Extensions to a small house in multiple occupation, to make the situation clearer for the reader.
- Some of the answers to the questions have been updated to provide further clarification about the situations in which planning permission is likely to be required.

4. Policy Context

- A new section heading 4.1.4 Secured by Design has been added to provide information about this document for the reader.
- At paragraph 4.10 under the list of policies, policy H4 has been added.
- At paragraph 4.13 a reference to the Planning Obligations Supplementary Planning Document has been added.

5. Criteria for Assessing Planning Applications

- A new paragraph 5.5 has been added clarifying that each application will be considered on its merits and the approach in situations where an applicant considers that planning permission should be granted but any of the criteria would not be met.
- Planning obligations and CIL, has been added as a heading and this is linked to the updated objectives.
- Protected species now has its own heading and additional text providing further information and signposting.
- Headings for Conservation areas, and Listed buildings have been added as headings to reflect a response from English Heritage.

Criterion HMO1: Creating mixed, balanced, sustainable and inclusive communities in Hatfield

- The criterion box has additional text referring to an over-concentration of HMOs and minor updates to wording, for consistency throughout the document.
- A new paragraph 5.10 has been added which expands on the reasons for the criterion.
- A new sentence has been included at the end of paragraph 5.13 to provide more information.

Criterion HMO2: Car Parking

- There are minor updates to wording for consistency throughout the document.

Criterion HMO3: Cycle Parking

- The criterion box has minor updates to wording, for consistency throughout the document and an amendment to the final sentence for clarification.

Criterion HMO4: Waste and Recycling Storage and Collection

- The information in the criterion box has been presented differently to provide greater flexibility for an applicant and the final sentence has been deleted.
- The order of the explanatory paragraphs has been updated and a new paragraph has been added relating to bin stores.

Criterion HMO5: Layout and Design

- The wording within the overall criterion box has been updated to make it clearer to the reader that this is the overall criterion and the other boxes sit beneath this and provide further detail.
- The order of the boxes within this section has changed from; External Amenity Space, Drying Area, Entrance, Internal Layout Standards, to; Internal Layout Standards, b. External Amenity Space, c. Drying Area and d. Entrance.
- Internal Layout Standards box; has small adjustments to the wording and to the order in which information is presented . A new explanatory paragraph 5.23, relates to the provision of a communal room.
- External Amenity Space box; the second bullet point now reads 'be private and secure'. The sentence below has a small amount of additional text for clarification. The final sentence has been deleted.
- Drying Area box; references to facilities for drying clothing have been removed in the box and explanatory text. The second sentence in paragraph 5.26 has a small amount of additional text for clarification.
- Entrance box; at paragraph 2, has a minor adjustment to the wording.

Criterion HMO6: Flood Risk

- A new criterion for Flood Risk has been included to reflect a response from the Environment Agency.

Conditions

- A new condition has been added.

Informatives

- This is a new section.

Monitoring

- This is a new section.

Appendices

- Appendix 1: References and Wider Planning Context. National Planning Policies has been updated to include PPS25 to reflect a response from the Environment Agency. Saved District Plan Policies has been updated to include R27 to reflect a response from English Heritage. Local Planning Context has been rearranged with some technical studies added and a new heading for Other Relevant Documents.
- Appendix 2: Equalities Impact Assessment, was included in the consultation draft and has been deleted following public consultation.
- Appendix 3: Protected Species, has been deleted and additional information is included in 5: Criterion for Assessing Planning Applications.
- Appendix 4: Space Standards is now Appendix 2.

Summary of the main issues raised and how these issues have been addressed in the SPD:

1 Introduction

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
12394	Mr Brian Rothwell		Para 1.2 and 1.3 are already in the Glossary.	Comments noted. It is important that the document reads as a whole. The glossary is an added explanation of key terms to aid the reader.	None.
584064	Mr Fizzy Koi		The document doesn't seem to have made any assessment of projected HMO demand in the next few years. The objectives should also take into account the expected reduction in student numbers once the new tuition fees are introduced. If there is any reduction expected at all, it brings into question whether this whole process is necessary - as there is likely to be a reduction in HMO demand which will completely remove the driving forces of planning action. Market forces will drive some existing HMOs back to residential use.	Comments noted.	None.
590901	Mr Neeraj Nathwani	Hatfield Accommodation Services	Restricting planning, may not have any benefit in actually trying to balance out communities. I.e. -students like living with students and families like living with families. Having a good design of HMO houses is definitely good, but it should not be at the expense of making it unviable for an investor, further crippling the economy for the country. HMO's (specifically student ones) should not be restricted where the majority are for students already. To put a family / young professionals in the middle of	Comments noted. As outlined in paragraphs 1.15 and 1.16 of the draft House in Multiple Occupation SPD, the problems associated with high concentrations of houses in multiple occupations have been recognised nationally by the government. The SPD continues at paragraphs 1.17 to 1.20 to outline high concentrations of houses in multiple occupation locally. Furthermore, the policy context to	None.

			students would be an injustice. Maintaining amenities is necessary - and having good order- if this was to get regulated, it would be good.	creating mixed, balanced, sustainable and inclusive communities is set out at section 4. The draft houses in multiple occupation SPD therefore contains a criterion relating to creating mixed, balanced, sustainable and inclusive communities. It is considered that this approach to concentration is the correct approach for Welwyn Hatfield.	
592229	Miss Anna Parr	Environment Agency	1.6 We would like objectives added stating the following: To increase water efficiency in both new build and conversion houses of multiple occupation. Not increase the number of people at risk of flooding.	Comments noted.	The Houses in Multiple Occupation Supplementary Planning Document has been updated accordingly with regards to an objective on flood risk.
585058	Mr Anthony Baird		I have had considerable experience of obtaining Planning Consent, Building Regulations, and Fire Regulations on HMO's exceeding 6 persons for St Johns College Cambridge. This was some 10 yrs ago and many things have changed since, but I still have a knowledge of the basic requirements. Fortunately I have had an opportunity to talk to residents who live in the intensified HMO area of Hatfield, and most of their concerns were about the students occupying them. All had experienced the problems outlined in Section 1.4.	Comments noted.	None.

2 Hatfield Article 4 Direction

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
414301	Mr Anthony Grice	Welwyn Garden City Society	As most of the multiple occupancy properties in Hatfield are used by students at the University, it is likely that they become vacant during the summer holiday period. In view of this, why cannot an Article 4 directive be issued during this 'void' period to force property owners/landlords to seek planning permission in order that more control can be imposed on the users of the property.	The Article 4 Direction relates to when a change of use would occur and it is not considered that there would be a change of use during the summer holiday period. Furthermore some students pay for accommodation throughout the year and some students choose to stay during the summer holiday period.	None.
589190	Mrs Marion Hayes		I strongly support the entire Draft SPD for HMOs including the Criteria for Assessing Planning Applications. If these Criteria are considered minimum standards for new HMOs why can't they be applied to existing HMOs when there is a change of tenancy??	Comments noted, thank you for your support. The Article 4 Direction is not retrospective and only relates to when a change of use would occur. It does not relate to when a change of tenancy occurs. A tenancy may change but the use may remain the same, for example a change of tenancy from one use as a House in Multiple Occupation to another use as a House in Multiple Occupation.	None.
591034	Mr Robert Gray		Whilst the immediate concern is within the Hatfield area. Other areas could soon be affected and I would prefer that the Article 4 Direction to be extended borough wide.	Comments noted. This consultation is not about the extent of the Article 4 Direction. Public consultation about the Article 4 Direction took place in early 2011.	None.
590901	Mr Neeraj Nathwani	Hatfield Accommodation Services	This area is rather large. It might be better to take other measures to specifically combat the problems caused by students.	Comments noted. This consultation is not about the extent of the Article 4 Direction. Public consultation about the Article 4 Direction took place in early 2011. The Article 4 Direction and Houses in Multiple	None.

				Occupation SPD are part of a wider corporate approach to houses in multiple occupation.	
585058	Mr Anthony Baird		The proposed new legislation will obviously stop the proliferation of HMO's in this area, but my concern is the hiatus period between the cancellation of licensing in August 2010 and the implementation of the new legislation in February 2012. Would this not allow further houses to be converted in this period, thus exacerbating the problem, or is there some kind of moratorium to cover this?	Comments noted. For clarification, the Houses in Multiple Occupation Supplementary Planning Document relates to provisions under planning legislation. This is in addition to, rather than in place of, provisions under Housing Legislation. The Management Regulations and requirements for licensing houses in multiple occupation are unaffected by the Houses in Multiple Occupation Supplementary Planning Document.	None.
609818	Councillor Helen Bromley		I am surprised that it is only part of Hatfield. This could lead to other areas being singled out and the problem spreading rather than, as is hoped, being contained.	Comments noted. The Article 4 Direction covers the whole of Hatfield. This consultation is not about the extent of the Article 4 Direction. Public consultation about the Article 4 Direction took place in early 2011.	None.

3 Is Planning Permission Required?

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
590901	Mr Neeraj Nathwani	Hatfield Accommodation Services	The council should have a clear policy for developers so they do NOT miss sell to investors.	Comments noted.	None.

591034	Mr Robert Gray		I believe that a change in planning, which requires new multiple occupation properties to apply for planning is a good move forward, however, I believe it should be necessary for existing premises to apply for planning at the next change of tenant. That is because, when the current tenancy ends, there is usually a window, whereby the property is unoccupied. therefore, temporarily ceasing to become a house of multiple occupation. It becomes a house of multiple occupation once the new tenants arrive. By using this tactic, the planning department can speed up the legitimisation of homes in multiple occupation that currently blight the area. Ideally, if you can include a requirement for landlords/estate agents to have a duty to notify the Council of the change of tenancy as a planning condition. This would improve the Council's database of who is in the area and improve the council tax collections.	Comments noted. There is planning case law relating to when a use can be said to have ceased and what the Council can reasonably require through the planning system which the Council has considered in producing the Supplementary Planning Document.	None.
--------	----------------	--	---	---	-------

4 Policy Context

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
414301	Mr Anthony Grice	Welwyn Garden City Society	I would support these Policies.	Comments noted.	None.
590901	Mr Neeraj Nathwani	Hatfield Accomodation Services	It is opinion if the character and quality of an area has improved or not.	Comments noted. This section refers to national policy as set out in the government's Planning Policy Statements.	None.

5 Criteria for Assessing Planning Applications

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
12200	Ms Katharine Fletcher	English Heritage	Where a building is listed, internal subdivision may damage the special historic interest of the property. It would be helpful to refer to the additional considerations that will apply to historic buildings, and the need for listed building consent.	Comments noted.	The Houses in Multiple Occupation Supplementary Planning Document has been updated accordingly.
592229	Miss Anna Parr	Environment Agency	<p>Criteria for assessing planning applications: A section needs to be added here covering flood risk. See the reason under 1.6 Flood Risk above.</p> <p>Water Efficiency: Welwyn Hatfield Borough Council sits within an area of serious water stress. This means there is a high population with high water demands and limited water availability and does not reflect water companies ability to supply water. Average water use in the Borough is 154 l/h/d, above the England and Wales average of 148l/h/d.</p> <p>Inefficient use of water can lead to unnecessary carbon emissions. Currently water use accounts for 27 percent of all carbon emissions from our homes. Building a house to 105 l/h/d will save 79 kilograms of CO 2 and 15 cubic meters of water per year, per house, over and</p>	<p>Comments noted.</p> <p>In relation to Water Efficiency: The Council considers that the comments relating to water efficiency are generic and are appropriate for the development plan and a development plan document, rather than specific to houses in multiple occupation and the Houses in Multiple Occupation Supplementary Planning Document.</p>	In relation to Flood Risk: The Houses in Multiple Occupation Supplementary Planning Document has been updated accordingly.

			<p>above building regulations (125l/h/d).</p> <p>Water efficiency standards help deliver objectives of the Thames River Basin Management Plan (RBMP). The RBMP sets out the actions required to protect and improve the water environment in line with requirements of the EU Water Framework Directive (WFD). Local authorities have a duty to have regard to RBMP's. The Thames RBMP contains an action (TH0440) that requests local authorities to seek the use of water efficiency standards (that exceed extant Buildings Regulations) in new residential development.</p> <p>Flood Risk: Existing buildings should not have their use changed to a house of multiple occupancy if it would increase the number of people at risk of flooding. Houses of multiple occupancy put residents at greater risk in a flood as they often have bedrooms on the ground floor.</p>		
534627	Mr Kevin Owen	Luton Borough Council	Thank you for consulting Luton Borough Council on the above document. It reads very well. I think all I can make are a couple of general observations, perhaps outside of the formal consultation process. A small point - but I think your criterion numbering (HMO1 etc) ceased when you got to "Drying Area" and beyond.	Comments noted.	The layout of this section has been updated to provide clarification for the reader.
414301	Mr Anthony Grice	Welwyn Garden City Society	I would support the criteria being proposed by the Borough Council when assessing Planning Applications.	Comments noted.	None.
584064	Mr Fizzy		I agree with most other conditions.	Comments noted.	None.

	Koi		Response includes detailed comments on concentration and car parking.		
--	-----	--	---	--	--

5.1 Criterion HMO1: Creating sustainable, inclusive, mixed communities in Hatfield

Is this the correct approach to concentration?

- 15 Yes
- 5 No
- 3 Don't know

Comments

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
12346	Mr Philip Harvey		Thank you for your document. I think it is sensitive to the needs of those using the facilities and to the impact of the HMOs on local residents. I particularly like the idea that where there are HMOs already care should be taken to ensure that the area in question does not become deprived of other types of accommodation.	Comments noted.	None.
592382	Mrs Anne Appleton		See 1b - For social reasons, the approach should be more restrictive. 1b - 10% seems more appropriate, as most homes in South Hatfield are First Time Buyers houses, sorely needed in S.England!	Comments noted.	A new paragraph 5.10 has been added which expands on the reasons for the criterion.

540710	Mr & Mrs Roger Brown		Unfortunately, nothing is proposed that will relieve the dreadful situation with existing HMOs in high concentration that are spoiling so much of Hatfield.	Comments noted.	None.
589205	Mr Ivan Ziff		My concern is that the new proposals will not apply retrospectively. Already the area is saturated with HMO's which has had a detrimental impact on local communities. 'Salisbury Village' is a prime example. Due to the high element of HMO's in the area the estate has had no end of problems over the years; the result of which home owners (property values have suffered because the area is stigmatised resulting in very little migration of new end-users into the estate i.e. families etc) and housing association tenants have been victims. In order for the new regulations to be effective it needs to apply to all existing HMO's only then will it have the desired affect. The new 'quota' of HMO's allowed in any given area will not take into account existing HMO's hence the idea of there being a quota will be mis-representative of the actual HMO presence in any given area.	Comments noted.	None.
12394	Mr Brian Rothwell		"People have a right to live near their work" Government tells us. Preventing students from doing so by the application of planning rules will be seen as victimisation. The approach should be to apply planning rules to the University to provide adequate accommodation for any further expansion by use of a Head Lease scheme or by building.	Comments noted.	None.
584064	Mr Fizzy		Concentration - 20% (or any %) doesn't make	Comments noted.	A new paragraph 5.10 has

	Koi		<p>sense. What this will do is make it easier for new HMOs to be approved away from the Uni, in areas which are less used to students. People in these areas will have bought houses thinking that they are far enough from Uni to be affected by a high student population. It will be easier (but less desirable) for an HMO to be approved in a mid-terrace between two non-HMOs, than between two other HMOs, where it is less likely to have an adverse effect on the neighbours. It's a bit like ringing the church bells all over the town so those who live next to the church aren't the only ones who have to put up with it!!</p>		been added which expands on the reasons for the criterion.
546059	Mrs Dulcie Peirson		Avoid overcrowding and an estate of housing in multiple occupation.	Comments noted.	None.
595226	Mrs Kathleen Gookey		A majority of houses in Hatfield are only two storey but still 5, 6 and more occupants are tenants - this should be restricted to 4 at maximum.	Comments noted.	None.
595247	Mrs Jean Dann		How will these conditions, particularly keeping the percentage of HMOs down, help in areas where it is much higher already? Will existing HMOs be checked to make sure they meet the conditions? At the moment I think many do not. It seems to me it's closing the stable door after the horse has bolted.	Comments noted.	None.
534627	Mr Kevin Owen	Luton Borough Council	You made an interesting point in stating that houses in multiple occupation form an important part of the housing stock being "one of the most affordable forms of accommodation in the private rented sector" (1.10). There is also reference to HMOs forming 32% of all private	Comments noted.	A new paragraph 5.10 has been added which expands on the reasons for the criterion.

			sector stock (1.13). On page 31 you point to policy kicking in - in those areas with a high concentration, the student issue is mentioned many times. Then Criterion HMO1 refers to a 20% HMO limit within a 50m radius of an application. I can see your desire to control stress areas, but given the importance of HMOs to your stock, I am wondering if variable limits would offer more policy flexibility, recognising perhaps that acceptable concentrations near colleges could be, say, 30%.		
590868	Mr Desmond Markus		While a long overdue step it does nothing to alleviate the large number of HMOs that already exist - particularly in Hatfield. A three-bedroom property close by is being used by at least 9 people (6 adults and 3 children and a dog); they rent it from a local landlord who is clearly not maintaining the property (front porch is sagging, back fence is tatty, while the gate has been patched together).	Comments noted.	None.
545809	Mr Kerry Page		As Hatfield has 250% above the national average multiple occupancy, all planning permission should be REFUSED until this anomaly has been removed.	Comments noted.	None.
545809	Mr Kerry Page		Once again it's the "CART & HORSE" you never seem to get it the right way round. For many years "50"? local planning has had the remit of sorting this problem out and so far failed. SOLUTION STOP MULTIPLE occupancy, repurchase all M O houses convert back to normal purpose, Hatfield may then become the rural town it once was & not the SHANTY TOWN it now is, or as MP SHAPPS said on B.B.C. question time Broken Town.	Comments noted.	None.

			Please attempt to mend it.		
609818	Councillor Helen Bromley		Why is it only part of Hatfield? Will it cover licensed and unlicensed HMOs?	Comments noted. The Article 4 Direction covers the whole of Hatfield. For clarification, the Houses in Multiple Occupation Supplementary Planning Document relates to provisions under planning legislation. This is in addition to, rather than in place of, provisions under Housing Legislation. The Management Regulations and requirements for licensing houses in multiple occupation are unaffected by the Houses in Multiple Occupation Supplementary Planning Document.	None.

Is 20 per cent an appropriate percentage to refuse planning applications for houses in multiple occupation?

- 14 Yes
7 No
2 Don't know

Comments

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
12346	Mr Philip Harvey		In my opinion this is a good idea as it will prevent too many HMOs in one area of Hatfield.	Comment noted.	None.
592382	Mrs Anne		10% seems more appropriate, as most homes	Comment noted.	A new paragraph 5.10 has

	Appleton		in South Hatfield are First Time Buyers houses, sorely needed in S.England!		been added which expands on the reasons for the criterion.
540710	Mr & Mrs Roger Brown		15%	Comment noted.	A new paragraph 5.10 has been added which expands on the reasons for the criterion.
584064	Mr Fizzy Koi		Surely it makes sense to allow a greater HMO concentration nearer to the Uni.	Comment noted.	A new paragraph 5.10 has been added which expands on the reasons for the criterion.
595226	Mrs Kathleen Gookey		This is a large percentage - my thoughts would be more like 10% of properties in my area.	Comment noted.	A new paragraph 5.10 has been added which expands on the reasons for the criterion.
595247	Mrs Jean Dann		10% or none. Students should all be in Halls of Residence.	Comment noted.	A new paragraph 5.10 has been added which expands on the reasons for the criterion.
545809	Mr Kerry Page		As Hatfield has 250% above the national average multiple occupancy, all planning permission should be REFUSED until this anomaly has been removed.	Comment noted.	None.
609818	Councillor Helen Bromley		Again is it licensed and unlicensed HMOs?	Comment noted. For clarification, the Houses in Multiple Occupation Supplementary Planning Document relates to provisions under planning legislation. This is in addition to, rather than in place of, provisions under Housing Legislation. The	None.

				Management Regulations and requirements for licensing houses in multiple occupation are unaffected by the Houses in Multiple Occupation Supplementary Planning Document.	
--	--	--	--	--	--

Is a 50 metre radius around the application property an appropriate distance?

- 16 Yes
4 No
3 Don't know

Comments

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
595226	Mrs Kathleen Gookey		This is too large a radius - our houses are small and nearly every one adjoining each other.	Comments noted.	A new paragraph 5.10 has been added which expands on the reasons for the criterion.
595247	Mrs Jean Dann		Prefer if there were none.	Comments noted.	None.
545809	Mr Kerry Page		As Hatfield has 250% above the national average multiple occupancy, all planning permission should be REFUSED until this anomaly has been removed.	Comments noted.	None.
609818	Councillor Helen Bromley		If it is to be a 20% what does this distance matter? 20% of a 50m radius = 20% of a 1 mile radius too.	Comments noted.	A new paragraph 5.10 has been added which expands on the reasons

					for the criterion.
--	--	--	--	--	--------------------

5.2 Criterion HMO2: Car Parking

Do you support the approach to car parking?

- 12 Yes
- 9 No
- 5 Don't know

Comments

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
12200	Ms Katharine Fletcher	English Heritage	We note that the draft SPD recognises the potential for changes to streetscape from additional wheelie bins, or front garden parking. In relation to the latter, the loss of front boundary walls for parking can significantly change the amenity and character of streets, and this can be cumulative where walls are lost on several properties. It might be helpful to refer specifically to this aspect. This should be a particular concern in conservation areas where townscape character may be especially vulnerable to erosion. We welcome the various criteria in the SPD which address design issues.	Comments noted.	The Houses in Multiple Occupation Supplementary Planning Document has been updated to include information about conservation areas at the start of section 5.
481953	Mr Chris	Highways	In respect of Criteria HMO2: Car Parking, the	Support welcomed for minimum car	None.

	Shaw	Agency	Highways Agency supports the minimum car parking standard per dwelling for houses in multiple occupation as 0.5 spaces per tenancy unit and the minimum requirements for bedsits - 0.75 spaces - and 1.25 spaces elsewhere. However it is important that sites for new dwellings of multiple occupation are located with the aim of reducing the need to travel by private car for employment, and retail use and leisure activity wherever possible.	parking standards. There are policies in the District Plan which relate to this issue which would also apply to proposals for new HMOs.	
414301	Mr Anthony Grice	Welwyn Garden City Society	As the experience in Hatfield has shown, it appears that most student occupiers have cars. The criteria of 0.5 per tenant is not practicable hence the parking difficulties in South Hatfield. The criteria should in my view be increased to 0.75 as in bedsits.	Comments noted.	None.
12394	Mr Brian Rothwell		As a student landlord for 15 years (not in Welwyn Hatfield) and a resident of Hatfield for 44 years I believe I well understand the causes of parking problems in this area. In the 15 years of letting only a couple of times has more than 1 student had a car a never have more than 2 students had a car. I don't think that is very much different to C3 housing and therefore to make HMOs provide more parking than C3 housing would be unfair and be seen as victimisation. The more government dissuades us from using our cars to go to work the more people including students will want to live close to work and leave their cars at home meaning that more cars will be parked during the day (when traffic is moving about) close to work. This will be so particularly near places like the University. Leaving the car at home is part of the problem not a solution. My	Comments noted.	None.

			preferred solution is to use some of the green space for parking where it will not spoil the area and to make some of the streets one way so that more street parking can be made available by having parking in a half herring bone fashion down one side.		
584064	Mr Fizzy Koi		Do you support the approach to car parking? - Broadly yes, but 0.5 per occupant may make sense away from the Uni but nearer the Uni, there will be less need for cars. The document makes it sound as if all the parking spaces have to be within the curtilage of the building - surely not so, else very few HMOs would be approved. The definition of the "area" that the spaces have to be in should be better described. The figure should include off-road spaces outside the property and roadside parking, where there are adequate spaces for the area.	Comments noted.	None.
540710	Mr & Mrs Roger Brown		Minimum (or nil if uni students).	Comments noted.	None.
595226	Mrs Kathleen Gookey		Students have car parking facilities, they are seldom used. My area (Bradshaws) does not have parking and spaces for the residents, let alone the many students.	Comments noted.	None.
595247	Mrs Jean Dann		I see no reason why students, who make up most of HMOs residents, need cars at all in Hatfield. There are plenty of buses and many houses are in walking distance. No cars are allowed by students in either Oxford or Cambridge.	Comments noted.	None.
545809	Mr Kerry		Hatfield roads were not designed for as high a	Comments noted.	None.

	Page		car ownership as there is currently, therefore "main roads" are in many places reduced to single lane. Houses designed for 2 adults & 2/3 children (2 cars) are now being occupied by up to 5 students (5 cars) 3 parked off road & 2 on grass verges or pavements.		
597571	Mr Frederick Olver		Parking should not impede normal traffic in roads where there is inadequate parking off road for occupants cars.	Comments noted.	None.
590901	Mr Neeraj Nathwani	Hatfield Accommodation Services	the Criteria need to be better thought out. I.e. - Students don't have/ need cars- bike racks where the university is 200 m walk away is neither useful or practical.	Comments noted. In response to your comments, occupiers of houses in multiple occupation are likely to make trips to locations other than a university, for example to shop, to work and to socialise. In addition, occupiers of houses in multiple occupation are likely to have visitors who may arrive by car.	None.
609818	Councillor Helen Bromley		HMOs are all adults living together. A family home has adults and children. It needs that to be taken into account. Parking areas should be permeable - always.	Comments noted. In response to your comment relating to car parking standards for houses in multiple occupation and dwellinghouses, the car parking requirement is different for each. In response to your comment relating to permeable parking areas, Schedule 2, Part 1, Class F of the Town and Country Planning (General Permitted Development) (Amendment) (No. 2) (England) Order 2008 sets out that parking areas can be either: hard surface	None.

				made of porous materials; or provision shall be made to direct run-off water from the hard surface to a permeable or porous area or surface within the curtilage of the dwellinghouse (commonly a soakaway). It is therefore not possible for the Council to require that parking areas are always permeable given that there is a permitted development right which allows them not to be.	
--	--	--	--	---	--

5.3 Criterion HMO3: Bicycle Parking

Do you support the approach to bicycle parking?

17 Yes

0 No

3 Don't know

Comments

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
540572	Mrs Janet Powell		If four share a house that may mean 4 cars if some on bicycles need to have entrance to back garden.	Comments noted.	None.
595226	Mrs		Never see anyone on a bicycle.	Comments noted.	None.

	Kathleen Gookey				
609818	Councillor Helen Bromley		BUT storage needs to be hidden from the front of the property - not so much the 'rear'.	Comments noted.	The Houses in Multiple Occupation SPD has been updated accordingly.

5.4 Criterion HMO4: Waste and Recycling Storage and Collection

Do you support the approach to waste and recycling?

- 15 Yes
- 4 No
- 2 Don't know

Comments

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
12394	Mr Brian Rothwell		Again the problem has not been properly identified. The problem is clear. Students are not house trained when they arrive at the HMO. If you visit the house in term time two things will strike you. a) It is full of rubbish (Beer bottles and cans, Pizza boxes and other discarded packaging. b) Every piece of crockery in the house is dirty. This is true even if you have supplied a dishwasher. Then go outside and the bins will be empty. There are two parts to the solution a) For Head Lease MSO the university send cleaners in	Comments noted.	None.

			periodically to clean up the communal areas (mine does). b) The landlord asks the next door neighbours to put the bins out at the required time and encourage the students to make friends with the next door neighbour. It works because the arrangement is advantageous to both.		
595226	Mrs Kathleen Gookey		The students next to me never put waste and recycling out to be taken away - only when reminded.	Comments noted.	None.
595247	Mrs Jean Dann		Yes, as long as the occupants know what to do and are checked to make sure they do it correctly.	Comments noted.	None.
545809	Mr Kerry Page		Wheelie bins are so grossly large they take up private parking space and put more cars on roads and verges.	Comments noted.	None.
590901	Mr Neeraj Nathwani	hatfield accomodation services	Waste, recycling and basic health hygiene and safety is important.	Comments noted.	None.
592382	Mrs Anne Appleton		If landlords do not pay Council Tax, ordinary residents presumably have to pay more for services (roads, parks, rubbish collections) that they have the advantage of.	Comments noted.	None.
609818	Councillor Helen Bromley		Again house is full of adults (no children) and will have a lot of take away food eaten by individuals, not together. More packaging will be thrown away. Needs to have policies pointed out.	Comments noted.	The Houses in Multiple Occupation SPD has been updated to include require capacity per occupant.

5.5 Criterion HMO5: Layout and Design

Garden: Do you support the space standard for the garden?

- 17 Yes
- 3 No
- 2 Don't know

Comments

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
12394	Mr Brian Rothwell		The bigger the garden the bigger the maintenance problem. Lots and lots of C3 houses have no garden. Let the student decide. There is no question on Drying but I'll have my say. You can supply all the equipment that you like but the washing will end up on a radiator in the bedroom. You're not guaranteed success but if you supply a dryer and the Head lease provides a fixed price for supply of electricity for a year (mine does) you will have half a chance. There is no question for Front Door but for the record it's this sort of thing that gets the council a bad name. It's blatant interfering. Let the Student decide.	Comments noted.	The Houses in Multiple Occupation SPD has been updated to remove the references to facilities for drying clothing.
540572	Mrs Janet Powell		We need gardens for the wildlife not covered with wood and concrete.	Comments noted.	None.

595226	Mrs Kathleen Gookey		Absolutely not - the garden next to me is a tip - in spite of numerous calls to the Student Liaison Officer. It is a mess. I employ a gardener (due to my age) to remove all the weeds etc that move to my garden. Some are 5ft tall!!!	Comments noted.	None.
595361	Mr J. Godbold		but can be difficult to manage to a good standard with shared tenants.	Comments noted.	None.
609818	Councillor Helen Bromley		It does not seem a strong enough statement. It needs to be more definite.	Comments noted.	None.

Communal Room: Do you support the requirement for a communal room and a kitchen or kitchen facilities in an HMO?

16 Yes
 1 No
 4 Don't know

Comments

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
12394	Mr Brian Rothwell		Can you have a HMO that doesn't have a kitchen or have I missed the point.	Comments noted.	None.
592382	Mrs Anne Appleton		Communal Rooms are very important to maintain relations between people. Our communities are becoming more and more unaware / uncaring of each other.	Comments noted.	None.

595226	Mrs Kathleen Gookey		The house next to me has been a nightmare from day one. The house itself is in a terrible state!!! Nothing done in may years - no plumbing or repairs at all.	Comments noted.	None.
595247	Mrs Jean Dann		Will this be checked as I believe some of the existing houses (HMOs) do not have a communal room and only a very small kitchen.	Comments noted.	None.
541847	Miss Enid Ashworth		Shared communal rooms, especially kitchens soon become messy and uncared for because there is nobody who has overall responsibility for their cleanliness or tidiness.	Comments noted.	None.
609818	Councillor Helen Bromley		BUT as a minimum standard.	Comments noted. The Council has recognised that there are some forms of house in multiple occupation where an applicant may be able to demonstrate that the provision of a communal room would not be appropriate, for example in a bedsit form of house in multiple occupation where the room is large enough (significantly exceeding minimum standards for a bedroom) to be multi-purpose.	None. A new explanatory paragraph 5.23, relates to the provision of a communal room.

Space Standards: Do you support the minimum space standards for; bedroom, communal room (living or dining), kitchen, dining/kitchen?

17 Yes

2 No

3 Don't know

Comments

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
12394	Mr Brian Rothwell		My HMO has two very large bedrooms and 2 near the minimum size. Some students prefer the opportunity to mess up a big space and some prefer the cosiness and secure feeling of the small rooms. I suspect it is what they have been used to at home and many of them have never had sole use of a bedroom before. Which room they are allocated to has never been an issue. Let the student decide.	Comments noted. There is nothing in the SPD which would preclude tenants choosing a large or small room.	None.
595226	Mrs Kathleen Gookey		The students should have comfortable, clean accommodation with ample bathroom space and kitchen requirements.	Comments noted.	None.
541847	Miss Enid Ashworth		Shared communal rooms, especially kitchens soon become messy and uncared for because there is nobody who has overall responsibility for their cleanliness or tidiness.	Comments noted.	None.
595361	Mr J. Godbold		Consider maximum persons per property. Consider minimum toilet / bathroom ratio.	Comments noted.	None.
540572	Mrs Janet Powell		It's a great idea to solve your housing list. Houses today have thin walls, noise levels. With a shared communal room and kitchen I bet there will be arguments about cleaning. People today some are not the tidiest. Why can't you have places like this for single mums perhaps it would stop these young girls having babies for houses.	Comments noted.	None.

609818	Councillor Helen Bromley		Though how can we check for changes after the licence is granted?	Comments noted. For clarification, this consultation does not relate to granting licences. Licences for houses in multiple occupation are granted under the relevant housing legislation.	None.
--------	--------------------------------	--	---	---	-------

6 Conditions

Are the conditions set out appropriate?

13 Yes

2 No

4 Don't know

Comments

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
592229	Anna Parr	Environment Agency	6.1 We would like a condition added stating: That water use reduced to 105 litres/head/day (l/h/d). Please see the reason under 1.6 Water Efficiency above. Water use of 105 l/h/d can be achieved easily with existing technology and at very little extra cost.	Comments noted. In relation to Water Efficiency: The Council considers that the comments relating to water efficiency are generic and are appropriate for the development plan and a development plan document, rather than specific to houses in multiple occupation and the Houses in Multiple Occupation.	None.

598207	godfreyclar k		Applications must be closely looked at and once granted to be regularly policed.	Comments noted.	None.
609818	Councillor Helen Bromley		Should also state about maintenance - 1, of conditions of council policies + 2, exterior of property + environs.	Comments noted. Planning conditions have to meet the tests of Circular 11/95 Use of conditions in planning permission.	None.

General Comments

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
556166	Mr Steve Collins	Head of Area (West) Homes and Communities Agency	Thank you for consulting the Homes and Communities Agency (HCA) regarding the above document. As a Statutory Consultee on Development Plan Documents (DPDs) produced by local planning authorities as part of Local Development Frameworks (LDFs) we have reviewed the document and can confirm that the HCA supports the principle of the document.	Comments noted.	None.
12440	Mr Gordon Wyatt	Planning & Conservation Lead Adviser Natural England	Thank you for consulting Natural England about the above draft document. Natural England has decided that it does not wish to comment on this occasion.	The Council notes that Natural England has no specific comments to make on the Houses in Multiple Occupation SPD.	None.
169659	Miss Rachael Bust	Chief Planner/Principal Manager Coal Authority	Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.	The Council notes that The Coal Authority has no specific comments to make on the Houses in Multiple Occupation SPD.	None.
312810	Mr Andy	County	Thank you for consulting me. Although I have	Comments noted.	The Houses in Multiple

	Instone	Planning Archaeologist Hertfordshire County Council	no specific comments, in general it is important that the historic environment is considered where appropriate. Namely the requirements of PPS 5 and the accompanying practice guide and the relevant parts of the proposed NPPF.		Occupation SPD has been updated to include information about conservation areas and listed buildings in section 5.
12353	Ms Rose Freeman	Director The Theatres Trust	Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and as this consultation is not directly relevant to the Trust's work we have no particular comment to make but look forward to being consulted on further LDF documents in due course.	The Council notes that The Theatre Trust has no specific comments to make on the Houses in Multiple Occupation SPD.	None.
595226	Mrs Kathleen Gookey		Certainly I do having lived next door for many years and had increased expenditure to sort out many issues.	Comments noted.	None.
597571	Mr Frederick Olver		Will the HMO be frequently inspected?	Comments noted. This will depend on whether a complaint has been received and whether a property requires a licence.	None.

Appendix 1 References and Wider Planning Context

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
12394	Mr Brian Rothwell		What purpose does this serve. This document should be stand alone. If any part of the other documents is relevant then put the relevant words in this document. Believe me it works.	Comments noted.	None.
592229	Miss Anna	Environment Agency	Appendix 1 - National Planning Policies PPS25 should be included in here.	Comment noted.	The Houses in Multiple Occupation SPD has been

	Parr				updated accordingly.
--	------	--	--	--	----------------------

Appendix 2 Equalities Impact Assessment

No comments received.

Appendix 3 Protected Species

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
12394	Mr Brian Rothwell		Does this apply to C3 houses?	Comments noted.	The Houses in Multiple Occupation SPD has been updated to include further information about protected species in section 5 and the appendix has been deleted.

Appendix 4 Space Standards

Person ID	Full Name	Organisation Details	Comments	Council's Response	Proposed changes to SPD
12394	Mr Brian Rothwell		One more time. Let the student decide.	Comments noted.	None.