

Consultation response from Merton Liberal Democrats

Merton's Liberal Democrats seek to ensure a better standard of accommodation than is often the case in HMOs, and see this SPD as part of ensuring improved design standards. To be effective therefore, it is important that the document is clear in its applicability and effect.

Key recommendation 1: Key/route map

We feel it would be helpful to provide some form of indication of applicability or "route map" through the SPD, given the different types of application (planning permission, permitted development), licensing (large HMOs, additional licensing or no licensing), not to mention the different rules applicable depending on whether it's a new build HMO or a conversion.

Key recommendation 2: relevance of SPD to licensing applications

Somewhat linked to the above, the SPD references the need for HMO licenses in several places, but it is unclear whether the standards/guidance in the SPD is intended to be relevant to license applications in any formal sense.

Specific comments on draft paragraphs

References to paragraph numbers below match those in the draft SPD.

It's unclear how 1.2, 1.3 and 1.4 are different in meaning or indeed if they are intentionally so, whether all are needed? It is unclear how, in practical terms, the SPD will guide those HMOs that do not require full planning permission. What status will the SPD have in prior approval applications, for example?

Subject to the above, it's unclear why 1.5 and 3.3 are both included and why they worded differently. 3.7 is again confusing, the sub-heading does not seem to relate to the matter covered and adds to the confusion around licensing (in more general terms it would be good to clarify if it is intended that the SPD affects license applications in some way?).

It is quite unclear from current wording of 3.4 whether and how the Air Quality SPD applies to planning applications relating to HMOs.

If the intention of section 4 (particularly the specific points in 4.4-4.13) is to direct developers to relevant parts of the other relevant planning documents, could this not be done in some form of table, including links to those documents?

The two component sentences in 5.8 seem contradictory: the qualification relating to the issue of areas with high PTAL seems to undercut the overall intention of emerging Local Plan policy T16.4 to reduce reliance on cars, as it holds open the argument that significant parking provision should be made for HMOs in lower PTAL areas (and this could also increase resident opposition owing to impact on eg on street controlled parking). Similarly, it seems to contradict 5.10.

In 5.32 and 5.34 what does "fully justified" mean?

The matters in 5.42-5.45 and 5.55-5.56 are practical examples of the issues referred to in relation to "key/route map" above. (In addition, 5.57 seems to suggest that conversions will be 'permit free', which is not the implication of 5.3).

Merton Liberal Democrats 28 July 2023

