

**Liverpool City Region and West Lancashire Recreation Mitigation on the Coast
Supplementary Planning Document Scoping Report (SPD)
Consultation 14 August 2023 – 9 October 2023**

<p>Name: Joanne Harding Contact email: joanne.harding@hbf.co.uk Organisation / private individual: Home Builders Federation (HBF) Contact address: HBF House, 27 Broadwall, London, SE1 9PL</p>	
<p>1. Do you agree with the scope of this SPD?</p>	<p>Yes / No</p> <p>The HBF has concerns about the scope of this SPD.</p> <p>The HBF is concerned about the use of an SPD to potentially introduce a financial burden on a planning application. It should be noted that PPG (ID: 61-008) states that ‘Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.’</p> <p>The HBF would strongly recommend that the Council undertake a full viability assessment of this Information Note to ensure that it is viable and that it does not impact on the delivery of homes. The NPPF (para. 34) establishes the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened.</p> <p>The HBF also has concerns about the proportionality of this SPD, particularly around considering the potential and likely impact of new development and the need for a sub-regional approach. Whilst a cross boundary approach may be needed in some cases, it is unlikely to be needed for the majority of applications.</p> <p>The HBF recommends that the Councils will need to ensure that they have sufficient evidence to demonstrate that there are potential impacts from new developments, and to justify any distances or other measurements or thresholds referenced.</p>
<p>2. Are there other things that should be included within the SPD?</p>	<p>In relation to identifying the mitigation measures required and securing mitigation measures the HBF recommends that the Councils provide sufficient detail and certainty for developers so that they will know what to expect, and when.</p>

3. If you believe SEA is required, please set out what the circumstances are requiring one to be undertaken as part of your response?	N/A
4. If you believe HRA is required, please set out what the circumstances are requiring one to be undertaken as part of your response?	N/A
<p>Comments on whether you agree with the scope of this SPD and/or whether there are other things that should be included should be sent to: <u>rmsconsultations@sefton.gov.uk</u></p> <p>RMS Scoping Consultation Merseyside EAS The Barn, Court Hey Park Roby Road, Huyton Merseyside, L16 3NA</p> <p>Comments must be received by 08.00 Monday 09 October 2023. For help in completing this form, please contact rmsconsultations@sefton.gov.uk</p>	

Data Protection

The personal information provided in your consultation responses will be processed in accordance with the requirements of the Data Protection Act 2018.

- All comments, including personal details, received will be logged securely.
- Comments from private individuals will be published online but these will be made anonymous.
- Comments from groups, organisations and companies will be published online giving name of group, organisation and company only.
- No contact details (including home address, email or telephone number) will be published.
- The Council may need to contact you to request further information or clarification in relation to the comment(s) made.
- Personal details will be used for the purposes of SPD production only.