



Correspondence Address:
Freedom for Dogs - Sefton



15th September 2020

Mr Dwayne Johnson
Chief Executive Officer
Bootle Town Hall
Oriol Road
Bootle
L20 7AE

Dear Mr Johnson

Public Space Protection Order for Dog Control

We are writing with regard to your ongoing PSPO consultation for dogs. Here:
<https://www.sefton.gov.uk/environmental-protection/pests-pollution-and-food-hygiene/dogs/consultation-pspo-for-dog-control.aspx>

Although we acknowledge that the last PSPO did not implement the most draconian measures of the original proposal, we question the need for a PSPO at all as laws already exist to cover the most common issues regarding dogs and dog ownership.

Below are some specific questions with regard to the rationale for the PSPO renewal that we would like answered:

1. Evidence

- a. What is the evidence that issues such as dog fouling and dog attacks exist and what is the scale of these issues within the area under consideration for the PSPO?
- b. What are the trends/impact since the introduction of the last PSPO – is the trend up or down?
- c. What evidence has there been with regard to enforcement of the PSPO and its impacts on relations between residents and the Council?
- d. Is there any other substantial evidence that the previous PSPO made a difference to these issues?
- e. If not, why has this evidence not been compiled in order to support the renewal of the PSPO?

2. Alternate enforcement/education options

- a. What other options has Sefton Council considered rather than implementing the PSPO e.g. the introduction of dog parks or fenced off areas within parks for dogs to exercise off lead, education and publicity of responsible dog ownership through local media?

- b. If these options have been discounted, could you please explain the rationale for this?
 - c. If no other options have been considered, can you please explain why this process has not been undertaken?
- 3. Other authorities**
- a. What do other authorities do regarding responsible dog ownership?
 - b. Have alternative approaches adopted outside Sefton been explored/considered/learned from?
 - c. If not, why not?
- 4. Active engagement with stakeholders (excluding the survey)**
- a. Have groups such as the RSPCA, Friends of the Earth, environmental groups, The Kennel Club, The Dogs Trust, local veterinarian professionals etc been approached within the area to seek their views?
 - b. Does the Council intend to hold any public meetings for people to express their views?
 - c. If not, why not?
- 5. Costs**
- a. What are the costs associated with development and management the PSPO, including procurement and management of an outside contractor?
 - b. What has it cost Sefton Council to outsource the enforcement of the PSPO to a private company?
 - c. There is much anecdotal evidence amongst the dog owning community that the enforcement officers are heavy handed, bullying and intimidating. Do contractors have perverse incentives to meet targets/ secure income?
 - d. If the costs have not been calculated, why not? If the answer to point 5(c) is "I don't know", why is the Council not aware of the basis on which their sub-contractor is conducting itself within the community?
- 6. Fines/Appeals**
- a. How much money has been collected in fines while the previous PSPO has been in place?
 - b. How has the money raised by fines been spent?
 - c. How many appeals have been logged, and how many of those resulted in fines being withdrawn?
 - d. If none of this information has been collated, why not?
- 7. Public Sector Equality Duty**
- a. Has the Council undertaken research to understand the demographic of dog owners within the community, ie what are the characteristics of the dog owning community most likely to be impacted by the PSPO (primarily age/gender)?
 - b. Has an impact assessment on this community been prepared for elected members and other stakeholders to consider when making any decisions on this issue? Could you please supply us with a copy of any assessment.
 - c. Has the Council considered that the PSPO may set different communities against each other, e.g. dog walkers and sports groups?
 - d. If not, why not to all these questions?

8. Awareness

- a. How does the Council intend to ensure that tourists and people without access to the internet can not only be made aware of any PSPO and its terms, but also contribute to the consultation process?
- b. If there are no arrangements in place, why not?

9. Beach

- a. It is suggested that the beach is available for off lead dog walking. However, palm oil is still present in significant quantities which is toxic to dogs. What are the Council's proposals to clean this up?
- b. Does the Council intend to provide an area on the beach to be sectioned off to enable dogs to exercise in safety and not be endangered by cars?
- c. Finally, does the Council intend to provide year-round access to the beach for cars? At the moment there is no winter access for cars meaning walkers have to walk quite a distance from either road parking or the car park, or alternatively walk over sand dunes to reach the beach. This excludes many people who are disabled from this area.

10. Council's Working Group on PSPOs

- a. We request minutes of any meetings held within the Council relating to the PSPO for Dog Control.
- b. If not immediately available, we shall request this information by way of a Freedom of Information Request.

11. Finally, we ask the Council to consider and advise on the scale of the issue. Has this been quantified? If not, why not?

When laws already exist to promote and manage responsible dog ownership, is the PSPO a sledgehammer to crack a nut?

We argue that the PSPO actually targets and criminalises dog owners who are already responsible, while does not even begin to tackle those who do not observe basic consideration for their wider community. The PSPO's aim is to tackle anti-social behaviour but fails to do so. It is not fit for purpose. The outsourcing of management of the PSPO to a private company also creates perverse incentives for that company to demonstrate a need for its existence and to generate income through potentially overzealous enforcement.

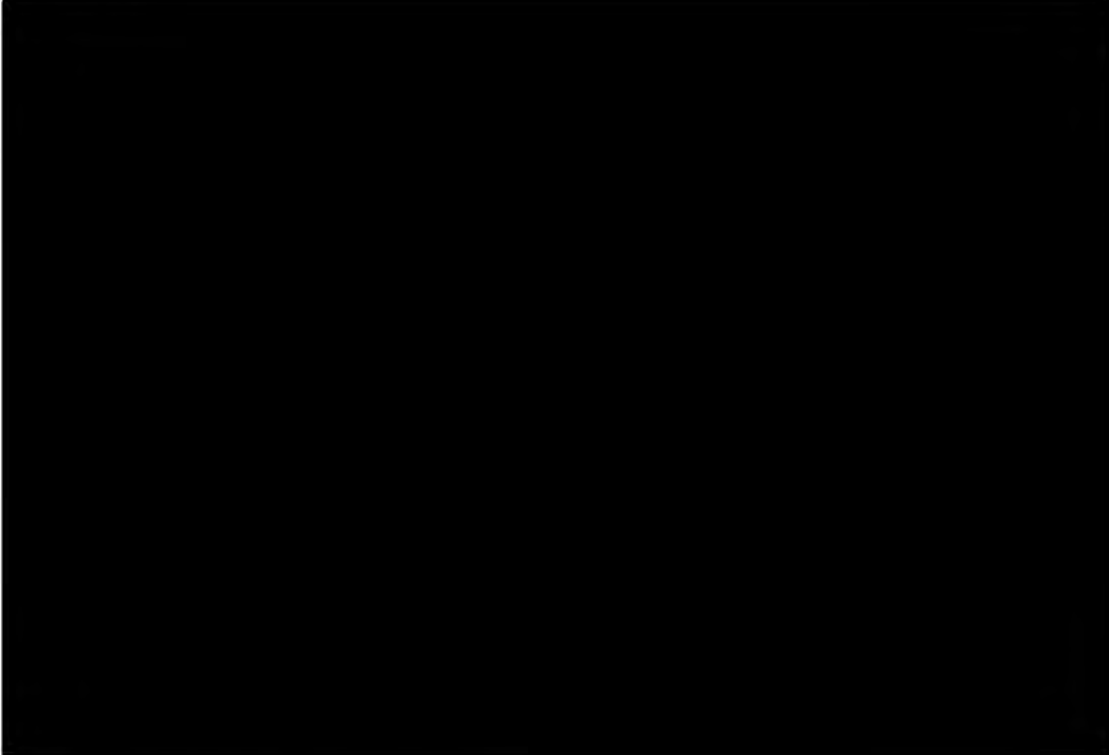
Dogs play a hugely positive role within our communities. They alleviate loneliness among the older generation and are good, loyal companions, supporting mental health in situations where people may otherwise suffer from depression, as well as obviously providing invaluable support to the disabled and as therapy dogs. Under the PSPO we feel that dogs are being marginalised and criminalised because of the behaviour of a minority of the community who should be dealt with through pre-existing laws supported by education and enforcement actions that are entirely fit for purpose.

We look forward to receiving your written response with detailed answers to our questions, and copies of all relevant documents pertaining to this matter.

This letter is also being copied to Steve Smith (Environmental Health & Trading Standards Officer) and Robert Monks (Principal Environmental Health Officer).

Yours faithfully ~~Sincerely~~

Signed:



For correspondence purposes please reply:

