

Worthing's Local Development Framework

Supplementary Planning Documents (SPD's)

- **Sustainable Development**
- **Internal Space Standards**

Statement of Consultation



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Introduction

A Supplementary Planning Document (SPD) provides greater detail on the Council's policies set out in the Development Plan Documents (DPDs) or other higher level planning documents. The SPDs in question provide guidance on how two of the policies in the Worthing Core Strategy will be applied and what will be required to support relevant planning applications. Whilst SPDs are not examined by an Inspector, they are still subject to a process of consultation and engagement with relevant parties. This document summarises this process.

The work programme for the progression of all SPDs is set out within the Council's Local Development Scheme and this also summarises the role and purpose of each document.

Sustainable Economy SPD

In summary, the purpose of this document is to provide more detailed guidance on how Core Strategy Policy 4 (Protecting Employment Opportunities) and Policy 5 (Visitor Economy) will be applied to relevant development. Informed by comprehensive evidence the starting principle set out in the document is that suitable and viable sites in employment use or in use as visitor accommodation should be retained.

Space Standards SPD

The purpose of the Space Standards SPD is to ensure that the floor and storage area space in new residential developments and conversions in Worthing is sufficient to secure a satisfactory standard of accommodation for their residents. The need for this document is reflected by concerns that have been raised about some of the room sizes that have been approved locally in the absence of any local standards.

Consultation Summary

In preparing the two SPD's for adoption, the Council is required to comply with the relevant regulations as set out in Town and County Planning (Local Development)(England) Regulations 2004 and 2008 amendments. These regulations require the Council to prepare and publish a statement setting out:

- Who was invited to be involved in the plan preparation
- How they were invited to be involved in the plan preparation
- A summary of the main issues raised and how they have been addressed

The following statement addresses these points and also is in accordance with Worthing's Statement of Community Involvement (SCI). The SCI sets out the level of consultation to be undertaken, which includes a wide range of media and publicity to engage the general public, hard-to reach-groups, community groups, councillors, businesses and governmental bodies.

The Consultation Process

During the preparation of these documents for wider public and stakeholder consultation there was extensive consultation undertaken within the Council with key officers and departments such as: the Tourism Development and Marketing Officer; Economic Development; Regeneration; Housing; and Development Management.

In line with Government regulations, the Council then consulted on the Sustainable Economy and Internal Space Standards SPD's from 19 August until 30 September 2011.

At the wider public and stakeholder consultation stage the documents were both subject to an extensive consultation process, which included letters, emails, the use of social media, the Council's website and the Planning Policy Newsletter which is circulated electronically and as hard copies at the Council Offices, libraries / help-points etc.

In excess of 400 letters and/or emails were sent to individuals, stakeholders and specific consultation bodies (as appropriate) recorded on the Council's Local Development Framework List of Consultees. In addition, the Council identified specific bodies and individuals to consult on the basis of the relevance of the SPD'S to them. This included local businesses, organisations representing local business interests, hoteliers and other accommodation providers, developers, house builders and those with commercial interests amongst others. Worthing members, relevant officers at Worthing Borough and Adur District Councils and all those that subscribe to the Planning Policy Newsletter were also directly consulted. In line with the Council's Statement of Community Involvement a number of bodies/groups representing a diverse range of groups within the borough were also consulted (a list of all those consulted is available on request). Copies of the letters and e-mails sent to individuals/stakeholders are attached as Appendix 1 and copy of the Planning Policy Newsletter (Summer 2011) can be found viewed using the link below.

<http://www.worthing.gov.uk/worthings-services/planningandbuildingcontrol/planningpolicy/planningpolicynewsletters/>

Response to Consultation

The number of comments that were received and the key issues of note for each document are set out below. The tables in Appendix 2 and 3 then set out all representations received and officer responses to these. Overall, relatively few comments were submitted to the Council in relation to either of these documents. However, the table appended to this report demonstrate how, in appropriate cases, the documents were revised in line with some of the comments that had been made.

Sustainable Economy SPD

During the consultation three responses (Vail Williams, Rapley's (Town Planning Consultancy) and a local resident) setting out a total of 21 comments were received in relation to the Sustainable Economy SPD. The key concerns related to the level of information / evidence being required by the Council and to the type and scope of employment uses covered by the SPD. Appendix 2 sets out the Council's response to each of the comments.

Space Standards SPD

During the consultation four representations (Barratt Homes, Roffey Homes, Rapleys and a local resident) setting out 13 comments were received in relation to the Space Standards SPD. Comments received included questioning the need for the standards on the basis that they were arbitrary and too rigid and a range should be given. Other comments suggested that the market should set the context for the space standards and that the standards will have an impact on development viability. Another comment was in relation to design issues – particularly balconies and private outdoor space. Appendix 3 sets out the Council's response to each comment made.

Appendix 1 - Copies of letters and emails sent to individuals / specific consultees / stakeholders

Appendix1(a) - Copy of letter sent to consultees on LDF List of Consultees

Date: 19 August 2011

Dear Consultee

Please find attached a Planning Policy Newsletter Summer 2011. The purpose of the newsletters, which are published quarterly, is to provide information to people in and around Worthing who have an interest in planning issues. This has been sent to you as it is considered that you may have a particular interest in the current consultation on two important documents that will be used in the determination of planning applications. The documents are the Sustainable Economy Supplementary Planning Document and the Space Standards Supplementary Planning Document. Please see the Newsletter for details of the documents and the ways in which you can respond.

If you wish to be a subscriber to the newsletter please refer to the 'Keep Updated' section of the newsletter.

Yours

Colette Blackett

Planning Policy Manager Adur and Worthing Councils

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Appendix 1(b) Copy of email sent to all subscribers of Planning Policy Newsletter

Dear Subscriber,

Please find attached the latest Planning Policy Newsletter for summer 2011. Of particular note in this issue is the current consultation on two important documents that will be used in the determination of planning applications. The documents are the Sustainable Economy Supplementary Planning Document and the Space Standards Supplementary Planning Document. Please see the Newsletter for details of the documents and the ways in which you can respond.

Yours

A handwritten signature in dark ink, appearing to read 'C Blackett', with a stylized flourish at the end.

Colette Blackett

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Appendix 1(c) Copy of letter/email sent to additional specific SPD consultees

Date: 18 August 2011

Dear Sir/Madam,

Please find enclosed the Planning Policy Newsletter for summer 2011. The purpose of the newsletters, which are published quarterly, is to provide information to people in and around Worthing who have an interest in planning issues. This has been sent to you as it is considered that you may have a particular interest in the current consultation on two important documents that will be used in the determination of planning applications. The documents are the Sustainable Economy Supplementary Planning Document and the Space Standards Supplementary Planning Document. Please see the Newsletter for details of the documents and the ways in which you can respond.

If you wish to subscribe to future editions of the newsletter please refer to the 'Keep Updated' section.

Yours

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Colette Blackett

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Appendix 2

Responses received on Sustainable Economy SPD

Ref	Respondent	Representation (Summarised where appropriate)	Response/Action
SE1	Vail Williams	Paragraph 3.5 – There is no reference or consideration given to whether there is a surplus of employment land and buildings available throughout the borough or in the vicinity of the specific application site.	Disagree – local research provides clear evidence that there is no justification for the release of any industrial estates and business parks as, in general, there is simply no surplus. In fact, new floorspace needs to be provided to meet needs over the Plan period. This will be kept under review through monitoring. In addition, to ensure that an adequate supply of employment sites is retained evidence suggests that should also be a presumption against the loss of land and buildings in employment use outside of these areas. However, despite this presumption the SPD explains that there might be circumstances where some loss may be acceptable.
SE2	Vail Williams	<p>Paragraph 3.18 – the need for a marketing exercise is accepted. A period of 2 years marketing is considered excessive. For example at the recent Havant Borough Core Strategy Inquiry the Inspector agreed to a marketing period of 18 months for larger sites and a twelve month period for smaller sites. The requirements set out in paragraph 3.8 should therefore be amended by:-</p> <p>Reducing the marketing period to a maximum of 18 months; differentiating between the marketing period needed for larger and smaller sites.</p> <p>There may well be exceptional circumstances where marketing for that length of time is simply not practical, some flexibility should be considered, perhaps any wording to the effect:-</p> <p>“In exceptional circumstances a shorter marketing period may be agreed subject to compliance with other</p>	<p>Agree – On balance, it is agreed that an 18 month marketing period for large sites and 12 months for small sites would be sufficient time providing that the other requirements of the SPD were complied with (particularly as this is the range that has been endorsed by an Inspector at a recent public examination.) To provide for a degree of flexibility in exceptional circumstances the final wording suggestion put forward by the respondent is also accepted.</p> <p>Therefore, amend paragraph 3.18 to state: <u>The Council will normally expect employment land and premises to be actively marketed for at least 12 months (small sites) and 18 months (large sites) and it may be necessary to review the effectiveness and quality of the marketing strategy every 6 months. It is accepted that the scale and nature of the proposal will influence the appropriate level of marketing time and this should be agreed in discussion with Council officers. In exceptional circumstances a shorter marketing period may</u></p>

		requirements within this SPD.”	<u>be agreed subject to compliance with other requirements within this SPD.</u>
SE3	Vail Williams	Paragraph 3.21 – this paragraph is not acceptable. It cannot be right that a site owner is left with a vacant building and running costs associated with that because the Council believe that in the future an alternative employment use could become viable. There is no timeframe to suggest when future viability may be obtained and the result of this will be sites and buildings lying vacant making no positive contribution to the economy.	Disagree – the paragraph simply highlights the fact that just because a site is lying vacant there is no automatic assumption that a change of use would be appropriate. As with all sites, the SPD will be used to assess proposals for vacant units and there are clear criteria set out with regard to expectations and timeframes.
SE4	Vail Williams	Paragraph 3.22 – if a financial viability argument is put forward by the applicant and the Council dispute this then it cannot be for the applicant to bear the costs of an independent test. If the Council believe there to be an issue then they should fund any independent assessment themselves.	Disagree – the onus should be on the applicant to demonstrate viability. If the Council is in any way concerned with the evidence put forward the applicant will be invited to address any issue. However, as a last resort, if agreement can not be reached independent advice will need to be sought and the applicant will be expected to pay the Council’s expenses for this. This approach is consistent with other instances when financial viability of a development is questioned. Furthermore, it should be remembered that the Council’s key objective in this regard is to retain appropriate employment land. If any loss of employment was granted then this is likely to increase the value of the land. As such, it is right that the applicant, who would benefit from this uplift, should meet these costs.
SE5	Vail Williams	Paragraph 3.23 – The second bullet point requires an applicant to establish that the costs involved in refurbishing or redeveloping the site for employment use are greater than the return that could be anticipated. However, the resultant development must also be commercially viable. Simply because an assessment	Disagree – it is considered that the argument put forward is flawed. In the example given by the respondent the location of the site and possible use of any redevelopment would clearly need to be taken onto account when calculating the return that could be anticipated.

		indicates a higher value does not mean the scheme would ever be developed. For example a warehouse development may show a positive return but never be built because it is the wrong location and would never be occupied.	
SE6	Vail Williams	Paragraph 3.25 – There are a considerable number of requirements set out within this paragraph, in total there is a real concern that these would prove too onerous. The paragraph should indicate some flexibility, for example “normally require” or perhaps a number of requirements will differ dependent upon the size of the building or site.	<p>Agreed – although the list provides a very clear understanding of the type of evidence that the Council would expect to see it is agreed that the full requirements of this list might be too onerous for some development proposals (depending on their size and nature).</p> <p>Suggest that first sentence is amended to read:</p> <p>The following evidence will <u>normally</u> be required to demonstrate a case that the costs of refurbishment/redevelopment exceed the likely returns from the site. <u>The level of information expected will depend on the nature of the development:</u></p>
SE7	Vail Williams	Paragraph 3.31 – The requirements of this paragraph need to be treated with caution. In many circumstances a scheme will not be viable unless the higher value uses are constructed first which then provides the finance for other uses. Additionally, employment uses can often be provided on a serviced site whereby when individual occupiers require a building it is effectively “built to order” rather than all units constructed in advance with the potential that they lie vacant.	<p>Noted – the concerns raised about the early delivery of the employment elements of a mixed used scheme are understood but the Council must ensure that all elements, in addition to the high value uses, are delivered. To address this concern it is suggested that an additional sentence is added to the end of paragraph 3.31:</p> <p><u>In other cases appropriate conditions (attached to the planning permission) relating to the phasing and delivery of a scheme will be used to ensure that all elements of the development are delivered.</u></p>
SE8	Vail Williams	Appendix 1 - It is accepted that the marketing of sites should be offered on flexible terms however commercial sensitivity sometimes means that this matter is left for	Noted – Commercial sensitivities relating to site discussions are acknowledged and understood. However, the Council will need to balance this with the need to ensure that the

		discussion with prospective purchasers/occupiers and this should be recognised.	appropriate level of information is provided to satisfy the requirements of this SPD and inform decisions on planning application.
SE9	Vail Williams	<p>Appendix 2 - An independent market valuation can be appropriate however it should not form part of the marketing materials, prospective purchasers will satisfy themselves regarding the market value.</p> <p>The 8th bullet point refers to “types of clients” this is the wrong phraseology, replace with “list of those”.. advised.</p> <p>Site particulars - the majority of the dimensions quoted are often given however the list is extensive and not appropriate for all buildings.</p> <p>Site particulars - An “asking price” is not always quoted. Sometimes it may simply refer to “offers invited” or above a certain maximum.</p> <p>Site particulars - Reference to service charges is rarely included as these vary over time which would result in constant updating of marketing particulars.</p> <p>Site particulars - Rateable value can sometimes be quoted however prospective purchasers will normally satisfy themselves regarding this.</p>	<p>Agree – amend first bullet point to read: including, details of an independent valuation. <u>It is accepted that, depending on the scale and nature of the proposal, an independent valuation may not be necessary but this should be agreed in discussion with Council officers.</u></p> <p>Agree – revise wording accordingly.</p> <p>Agree (for all comments on site particulars) – It is agreed that the requirements of this list may not be appropriate for all sites. Suggest amending the introductory sentence to read: <u>The following information is normally required to be submitted. However it is acknowledged that some of this information may not be necessary depending on the nature of the site and type of development. If in doubt, the applicant should seek advice from the Council to ensure that all the information required is provided.</u></p>
SE10	Vail Williams	<p>General Comments - The general thrust of the SPD is accepted but there is real concern that the amount of information required within the SPD is far too onerous and potentially costly. If the Council requires each and every point to be met then this will either result in:-</p> <ul style="list-style-type: none"> • Future development opportunities not coming 	<p>Agree in part – The SPD aims to provide very clear guidance and set out the level and type of evidence required for the Council to make well informed decisions about any development proposal. Clear guidance will help potential applicants, Council officers and other interested parties. However, it is acknowledged that the right balance must be struck between providing very clear advice and not making the</p>

		<p>forward because land owners take the view that it is too costly / time consuming;</p> <ul style="list-style-type: none"> • Applicants decide for themselves what information is to be provided. <p>Overall there should be a paragraph indicating that flexibility will be used dependent upon individual sites and buildings, it cannot be right that smaller sites are required to provide as much detail as larger sites and equally specific circumstances for each site may mean that certain requirements need not be met or are indeed impossible to meet.</p>	<p>requirements too onerous.</p> <p>The concerns raised about this 'balance' are noted and have already been partially addressed through the amendments set out in SE6 and SE9 above. In addition, it is suggested that to help in this understanding an additional sentence is added to the end of paragraph 1.9 to read:</p> <p><u>The guidance included in this SPD (and appendices) sets out clearly the criteria that would be used to assess relevant development proposals and lists the type of evidence that would be expected to support any application. However, it is acknowledged that, depending on the nature of the proposal, the full extent of these requirements may not be necessary to support all applications. The applicant should at an early stage seek to agree with the Council any variation in the level of information required.</u></p>
SE11	Rapleys (Town Planning Consultancy)	It should be emphasised that the SPD, relative to its status, will be applied as guidance only.	Disagree – there is no need as chapter 2 explains the role of this SPD. The document provides greater clarity on policies in the Core Strategy and, in line with legislation, is designed to provide guidance on local planning matters. Although the SPD, when adopted, will be a material consideration when planning applications are submitted it should be noted that, if justified, there may be scope for some flexibility in how this guidance is applied.
SE12	Rapleys (Town Planning Consultancy)	The terms of the SPD go beyond the requirements set out in policy 4 of the Core Strategy.	Disagree – the remit of the SPD is explained above and the Core Strategy is very clear (particularly paragraphs 6.34 and 6.44) in that further guidance will be published by the Council to provide greater clarity on how policies 4 (protecting employment opportunities) and 5 (the visitor economy) will be applied.
SE13	Rapleys	The SPD guidelines should not be applied retrospectively.	Noted – The SPD does not state it will be used retrospectively

	(Town Planning Consultancy)	To seek to do so after marketing for a site has already been completed would be disingenuous.	and, as with all newly adopted policy or guidance an allowance will be made when applying the document to any applications already 'in the system'. However, it should be noted that prior to the adoption of the SPD the Council would still expect to see the appropriate level of supporting information to justify the potential loss of any employment land or visitor accommodation.
SE14	Rapleys (Town Planning Consultancy)	The SPD should be applied in the context of adopted planning policy, which includes policies relating to 'Areas of Change'. The SPD guidelines should not apply to sites located within such areas.	Disagree – it would not be consistent, justifiable or sensible to create any exemptions and the document will be applied to all relevant sites in the Borough.
SE15	Rapleys (Town Planning Consultancy)	There are inconsistencies in the document in terms of defining what is meant by employment sites. Sometimes the term means 'suitable and viable sites' (para 2.6) and sometimes it means all employment uses (para 2.2).	Disagree – Paragraph 2.6 explains that the SPD will be used to retain suitable and viable sites in employment use or as visitor accommodation. Paragraph 2 seeks to ensure that the loss of any employment site is not at the expense of the local economy. This is consistent as it is argued (and justified by evidence) that the loss of any suitable and viable sites would be at the expense of the local economy.
SE16	Rapleys (Town Planning Consultancy)	The SPD should embrace the wider definition of 'employment' uses, against the terms and definitions of 'economic development' set out in PPS4	Disagree – Following the Core Strategy Examination the Inspector recommended a change to the text to make it clear that Policy 4 relates specifically to employment uses B1, B2 and B8. In her reasoning (paragraph 56 of her Report) she 'appreciated that PPS4 gives a fairly broad based definition of 'economic development'. However, the supporting evidence to Policy 4 is the Knight Frank work and this primarily restricts itself to 'B' type uses and concludes that there is justification for their protection.' For this reason the definition in the SPD should not be widened. In addition, other uses are not disregarded as the sequential test set out in the SPD allows consideration to be given to alternative employment generating uses outside of the 'B' use classes.

SE17	Rapleys (Town Planning Consultancy)	The suggestion made in paragraph 3.31, whereby planning permission for mixed use schemes would be granted conditionally on the delivery of an employment use prior to any other uses, would render schemes unviable.	Noted – see response SE7 above
SE18	Rapleys (Town Planning Consultancy)	Where the Council considers that the marketing strategy is inadequate, an applicant should be invited to make amendments, as per best practice, rather than a refusal being made (as suggested in appendix 2 of the SPD).	<p>Agree – add new criterion to the start of the list to state:</p> <p><u>a) To provide additional information to address the concerns raised by the Council.</u></p> <p>Existing a, b and c to become <u>b</u>, <u>c</u> and <u>d</u> respectively.</p>
SE19	Rapleys (Town Planning Consultancy)	The requirements in terms of cost analysis (para 3.25) and marketing strategies (appendices 1 and 2), are excessive – particularly given the guidance that already exists relative to such matters. Furthermore, they are unrealistic and aspirational, particularly with regard to seeking information from a bank on matters of viability.	Noted – See response to SE6, SE9 and SE10 above.
SE20	John Davey (resident)	A more flexible interpretation needs to be given to the term ‘employment’. If this term means ‘employment in manufacturing or industrial processes’ then the SPD is attempting to turn back the clock. It is suggested that the term ‘employment’ should include all types of jobs including employment in leisure, social care etc and that uses within ‘industrial estates’ should be expanded to allow for the provision of ‘employment’ in the wider sense.	Disagree – See response SE16 above
SE21	John Davey (resident)	Hotel and guest house accommodation. Experience in Brighton has been that until unsuitable accommodation was removed from the market it was uneconomic for new hotel operators to develop modern attractive sites (Hotel du Vin, Hotel Seattle etc.). I suggest that marketing of	Noted - The SPD does not seek to retain unsuitable or unviable accommodation – instead it provides the framework for this change by setting out the criteria that would need to be applied to demonstrate that this is the case. The Council would clearly welcome new, modern hotel providers on appropriate

		unsuitable accommodation be limited to 12 months to clear redundant accommodation from the town and allow a new market to find its level.	<p>sites and it is not felt that the contents of this SPD would jeopardise this objective in any way.</p> <p>It is felt that the required marketing periods set out in paragraph 4.11 (bullet point 1) are appropriate but the following wording changes are suggested to provide for a degree of flexibility in appropriate circumstances:</p> <p>‘The business should normally have been marketed for sale as a going concern for a minimum period of 2 years in a strong market and 3 years in a downturned market. In exceptional circumstances a shorter marketing period may be acceptable if justification for this can be given and then accepted by the Council.</p>
SE22	Joint Planning Committee (13 th Sep)	Some minor suggestions (particularly relating to the visitor economy) were made by Members of JAC.	<p>Make minor amendments in line with Members comments:</p> <p>Revise introduction to help reinforce the need for this documents and local circumstances which make it so important (particularly in light of the emerging National Planning Policy Framework).</p> <p>Revise paragraph 1.3 to provide a more realistic summary of the current hotel / guesthouse market.</p> <p>Provide short overview of the evidence base that was used to inform policies 4 and 5 of the Core Strategy.</p>
SE23	<i>Recent publication</i>	The British Hospitality Association published useful and relevant statistics and data for Worthing in October 2011.	Reference to this report and any relevant supporting information to be incorporated within Chapter 4.

Appendix 3

Responses received for SPD Space Standards

Ref	Respondent	Representation (Summarised where appropriate)	Response/Action
SS1	Barratt Homes	It is not for the Local Authority to impose arbitrary house sizes on to the housebuilding industry for private dwellings. Leave this up to housebuilders who have the expertise and understand what the market wants. Rigid floor and garden sizes are inflexible and in conflict with market forces.	<p>Disagree – It would simply not be good practice or ‘good planning’ to leave all design, size and layout issues in the hands of the housebuilders or the market. As such, planning authorities are encouraged to progress guidance to address planning issues at the local level. The housebuilding industry has, in some instances, been progressing applications in Worthing that have resulted in what many would consider to be sub-standard /size accommodation. It is these concerns, and the need for local guidance / standards, that have acted as the driver for this document.</p> <p>The standards are based on local research, national advice and existing space standards used by other authorities. Neighbouring districts Adur and Mid Sussex both have standards not dissimilar to Worthing’s and it is understood that these standards are being used successfully when dealing with housing proposals.</p> <p>The UK has the smallest newly built homes in western Europe (EU Housing statistics 2005). New homes in Ireland are 15% bigger, in the Netherlands they are 53% bigger and in Denmark 80%. Scotland and many European countries utilise national space standards.</p> <p>The Royal Institute of British Architects (RIBA) says in recent research ‘The Case for Space – the size of England’s new homes’ (Sept 2011) that the average new home in England is only 92% of the recommended minimum size. RIBA supports the London space standards which are higher than Worthing’s</p>

			<p>for more than half of the proposed standards.</p> <p>Although the SPD, when adopted, will be a material consideration when planning applications are submitted it should be noted that, if justified, there may be scope for some flexibility in how this guidance is applied. This is set out in paragraph 4.1 of the SPD.</p>
SS2	Barratt Homes	<p>Mandatory and prescriptive dwelling standards have an impact on development viability. The standards will lead to fewer homes being built overall. The homes will be larger and better designed but they will be fewer in number and consequently housing will continue to be very expensive and beyond the reach of those on low to average household incomes in Worthing. The issue is not just the additional cost of building material per square metre, it is about the number of units that can be provided on the site, thereby optimising the revenue stream needed to pay the land owner the price sought for the land and meeting the cost of affordable housing and other policy requirements.</p>	<p>Disagree - Research carried out for the Greater London Authority analysed housing schemes to assess cost and delivery impact of the new London standards. The new minimum floor areas did not necessarily impact on the number of homes being delivered. The report suggested that by working with designers it was expected that the developer would be able to avoid reducing the number of homes. Increases in building costs due to the space standards ranged from 10% to 1%, but the report concluded that the London Housing Design guide would, in the majority of cases, have little impact on the number of homes delivered, and the additional building costs would also reduce by 2013 (Quoted from the article 'Living room' in RIBA Journal October 2010 in: The case of space, the size of England's homes – RIBA September 2011).</p> <p>The standards should lead to an increase in marketability of new homes.</p> <p>It should also be noted that the proposed standards provide a degree of flexibility and the applicant will be given the opportunity to try and justify their approach if the standards are not being (or cannot be) met. This is set out in paragraph 4.1 of the SPD.</p>
SS3	Barratt Homes	<p>In a period of low wage growth and spiralling living costs higher selling prices or rents needed to recoup the cost of</p>	<p>Disagree - It is accepted that it is not easy for people to get on the housing market and the Council will continue to look for</p>

		good design do not accord with people's ability to pay more. Barratt's experience is that people are not willing to pay more for good design. Most people determine their house choice by price, location and size (the number of bedrooms). Good design and quality of build is important, but this can still be achieved by schemes that do not comply with the standards put forward.	ways to deliver affordable housing and meet local housing needs. However, the Council needs to deliver housing that is of adequate space and design to deliver a better quality of life for residents and to enable them to remain for longer in their homes without having to move to slightly bigger accommodation.
SS4	Barratt Homes	The recent economic downturn saw a definite shift away from flatted developments which were less in demand and the difficulties potential purchasers had with access to finance. At the same time there was significant demand for smaller 2 and 3 bedroom homes and many larger consented sites were re-planned to introduce more of this type of property. The imposition of set standards makes it more difficult for the industry to respond to changing market conditions.	Disagree – It is acknowledged that the development industry would need to respond to any significant changes in demand. However, this clearly should not be a reason to justify or allow the delivery of sub-standard / under-sized living accommodation. Dwellings of adequate size and design standards are needed regardless of market trends.
SS5	Barratt Homes	It imposes another unnecessary 'standard' on the development industry at a time when the government is committed in trying to reduce the 'burden of regulation'.	Disagree – Compliance with these standards should not be seen as a 'burden' - it is simply a means of ensuring that homes of adequate and decent standards are being provided. If homes are of a good standard they are more marketable which is clearly in the interests of the developer. Neighbouring councils are using similar standards. See also response SS1 and SS3 above.
SS5	Roffey Homes	No space standard has been provided for a three bedroom flat.	Noted – In general, it is not often that three bedroom flats are being proposed and for this reason neighbouring councils (Adur and Mid-Sussex) do not use a standard for 3 bedroom flats. If an application were to be submitted for a 3 bedroom flat the existing figures for a 2 bedroom flat would be applied (pro-rata) as a starting point. As a guide, a figure of 74m ² for a 3 bedroom flat is applied elsewhere (London and Ashford Borough Council).
SS6	Roffey Homes	Please clarify definition of storage space in 5.1. What does dirty storage mean? If additional tall housing units	Noted – Wet and dirty storage is storage for items such as buggies, scooters, boots etc where there is no practical access

		are provided in a kitchen does it count?	to outdoor storage – the text will be amended to explain this. It is up to the applicant to demonstrate that sufficient storage space is provided. Additional storage space can be located in the kitchen as long as it is 'additional'.
SS7	Roffey Homes	Paragraph 6.2 – strongly disagree with the statement that overlooking from the street or other public place is only acceptable when set back from the street. This is backed up by the fact that many purchasers choosing to live in these locations because they enjoy 'watching the world go by' and like the interaction.	Agree – The point raised the respondent is accepted. Add the following text after 2 nd sentence:street onto which they face. 'However, it is accepted that in some locations (particularly the town centre) it may be appropriate to have balconies and outdoor space near the street if suitably designed.'
SS8	Roffey Homes	Paragraph 6.5 – Private outdoor space for flats including balconies. There is no mention of difference between town centre and suburban development. It is unlikely that in a town centre development that the footprint will allow for communal space to make up the balance of 20m ² per flat.	Agree – It is acknowledged that the location of the development will have a bearing on the ability to meet these standards whilst also delivering 'good design'. Amend the final sentence to state: 'Communal space should normally be provided to make up the balance of the 20m ² but this may be influenced by the design and location of the development. '
SS9	Roffey Homes	Paragraph 6.5 – no mention of any relaxation for Conservation Areas where large balconies might be out of place and there is no potential for communal space.	Agree - It is acknowledged that in Conservation Areas large balconies might not be suitable and attention to detail needs to be given to balconies and private outdoor space in Conservation Areas. Add sentence at end of this paragraph to state: 'These standards may also need to be applied more flexibly in sensitive locations, such as Conservation Areas, where design considerations may take a precedent.'
SS10	Rapleys	It should be emphasised that the SPD, relative to its status, will be applied as guidance only – and in those terms the standards are not prescriptive.	Disagree - The SPD provides greater clarity on policies in the Core Strategy and, in line with legislation, is designed to provide guidance on local planning matters. Although the SPD, when adopted, will be a material consideration when planning applications are submitted it should be noted that, if justified, there may be scope for some flexibility in how this guidance is applied (see paragraph 4.1 of the SPD).

SS11	Rapleys	The standards should be provided as a range, rather than a minimum, to provide for flexibility relative to site specific circumstances. In any event, a requirement to go beyond the figures set would be unreasonable, given that they are presented as a standard.	Disagree – The guidance is clear in what it wants to achieve - namely decent size accommodation. However, the proposed standards are flexible to a degree and if variation can be justified they would not need to be applied rigidly. However, it is important to provide clarity and a clear bench mark for assessment – a ‘range’ would not achieve this. (See paragraph 4.1 of the SPD).
SS12	Rapleys	In applying such flexibility, the prevailing trends of the commercial market should set the context for the standards for any given scheme at the time a planning application is made.	Disagree – Commercial market trends will clearly influence the type of dwellings being delivered but this should never result in the delivery of substandard / size accommodation which this SPD is seeking to address. See also responses SS1 and SS4 above.
SS13	John Davey	Waiting lists for social housing are long and it is suggested that people are not interested in standards they just want accommodation. One bed flats at Brighton Marina are 41m ² and 2 bed flats 52m ² . It is suggested to reduce the space standards by 20% across the board.	Disagree – The floorspace standards suggested by this respondent fall a long way below current advice and those being applied successfully elsewhere. A reduction to this level could result in proposals coming forward with room sizes similar (or below) those that have triggered the initial concerns. It should be noted that no developers have suggested a similar reduction in standards. See also responses SS1 and SS3 above.
SS14	N/A	During the publication the Royal Institute of British Architects (RIBA) published a very relevant document ‘The Case for Space – the size of England’s new homes’ (Sept 2011)	Amend – where appropriate the supporting text of the SPD will be amended to refer to this publication and incorporate any relevant points.