

**Worthing's Local Development Framework  
Supplementary Planning Documents (SPD's)**

- **Tall Buildings**
- **Guide to Residential Development**

**Statement of Consultation – November 2013**



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## **Introduction**

A Supplementary Planning Document (SPD) provides greater detail on the Council's policies set out in the Core Strategy and high level planning documents. The National Planning Policy Framework (NPPF) supports the production of SPDs where they can help developers make successful applications or aid infrastructure delivery. Both SPDs in question provide topic based guidance which sets out additional information on a specific local issue and what will be required to support relevant planning applications

Whilst SPDs are not examined by an Inspector, they are subject to a process of consultation and engagement with relevant parties. When adopted by the Council, the guidance will form a material consideration when relevant applications are submitted and considered.

## **Tall Buildings SPD**

The Council has prepared the draft SPD to provide clear and consistent guidance on tall buildings to ensure the suitability and sustainability of their location and the quality of their design and construction. The guidance will be particularly useful in the context of Worthing as the relatively compact form of the borough and the constrained nature of the surrounding areas means that pressure to 'build upwards' is likely to continue and it is therefore important that criteria are established by which the quality and location of developments can be assessed and controlled.

Throughout the document key principles are highlighted and these are incorporated within the assessment checklist set out in the final section of the document. This checklist provides a clear understanding as to how the Council will consider proposals for tall buildings in a consistent manner and the supporting information that any potential applicant will be expected to provide.

## **Guide to Residential Development SPD**

A key objective of the Core Strategy is to ensure that the right mix and type of well designed homes are delivered in the right places to meet the identified local need. This SPD, which will apply to all new residential development in the borough, aims to ensure that the right homes are built where they are needed and that they are built to the highest design quality. The document covers matters such as: housing mix; density; sustainable construction; and design.

The SPD interprets policy and includes design-led good practice guidance, pulling together information in one place. As such, it will (when adopted) contribute to successful planning application outcomes and improved design and, in taking account of policies and other standards and requirements, should speed up the applications process.

## **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 2012 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 the Adur and Worthing Statement of Community Involvement (SCI) 2012. The SCI sets out guidance on the type and level of consultation that should be undertaken in respect of SPDs. Such is the nature of some SPDs that Adur or Worthing Council may focus consultation on specific and general consultation bodies. However, the Councils will ensure that all consultation stages are widely advertised to ensure that all interested parties have an opportunity to comment. This 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**

The Council sought to engage widely during the consultation period. Internal consultation with key Council departments was undertaken on the drafts such as: Economic Development; Regeneration; Housing; and Development Management, before being subjected to wider public and stakeholder consultation, initially for a 6 week period from June 28<sup>th</sup>.

This wider public and stakeholder consultation included the use of social media, the Council's website and the Planning Policy Newsletter which is circulated electronically and as hard copies to the libraries / help-points etc. In addition, all key stakeholders and interested parties were directly notified of this consultation through either an e-mail or a letter. This included large 'mail-outs' to resident groups, developers and landowners on the Council's consultee database. In addition, the publication of the documents was made known to Council officers, all Worthing Members and subscribers to the Planning Policy Newsletter.

Despite the extensive consultation process outlined above the Council received very few representations on either document. For this reason, and to allow for the fact that some respondents may have been on summer leave, a decision was made to extend the consultation period until August 30<sup>th</sup>. All consultees were made aware of this extension which was also made known on the front page of the Council's website and social media.

The extended consultation period did not generate many more responses and the number of representation on either document remained very low.

A summary of the comments that were received, key issues of note and any resulting amendments for each document are set out in the appendices to this report.

Copies of the letters and e-mails sent to individuals/stakeholders are attached as Appendix 1 and a copy of the Planning Policy Newsletter (Summer 2013) can be found on the Council's website:

<http://www.adur-worthing.gov.uk/planning-policy/news-updates-community-involvement/newsletters/>

## **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 were made.

### Tall Buildings SPD

During the consultation only 3 responses were received. Very few amendments are proposed in response to the comments received and these are not of great significance. Appendix 2 sets out the Council's response to each of the comments.

### Guide to Residential Development SPD

A total of 14 representations were received on this document from respondents. Two of the responses were from internal officers and 5 from external organisations. The responses covered a number of issues including:

- family homes and internal space standards and layout (6)
- lifetime homes (2)
- sustainable energy (2)

Appendix 3 sets out the Council's response to each comment made.

## **Worthing Planning Committee**

The comments made on both documents and the proposed revisions were considered by members of Worthing Planning Committee on October 2<sup>nd</sup> 2013. Whilst no further comments were made on the Tall Building Guidance some questions were raised in relation to a couple of elements of the Guide to Residential Development. A further 'Issues Paper' (Appendix 4) was prepared which set out some additional minor amendments. These were considered and agreed by Members of the LDF Working Group on 17<sup>th</sup> October. Both documents were then forwarded to the Cabinet Member for

approval. Following a 'Call in Period' the Cabinet member approved the adoption of the two SPD's on 13<sup>th</sup> November 2013.

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

Appendix1(a) - Copy of letter sent to individuals/stakeholders

Date: 26<sup>th</sup> June 2013

Dear xxxxx,

**WORTHING PLANNING POLICY NEWSLETTER**

Please find enclosed the latest copy of the Worthing Planning Policy Newsletter. You have been sent a copy of this version as you have been identified from our database as someone who may have an interest in one or more of the areas of work currently being progressed, particularly consultation on two draft Supplementary Planning Documents:

- Draft Tall Building Guidance
- Draft Guide to Residential Development

The Newsletter, which provides links to all documents, also sets out information on the Strategic Housing Land Availability Assessment which seeks to identify all development opportunities within the Borough.

Please use the contact information supplied on the Newsletter to submit any comments, notify me of any changes to your contact details or to provide an email address for future correspondence. You may also want to request that you receive all future copies of the Newsletter.

Yours faithfully,



Ian Moody  
Principal Planning Officer  
Adur and Worthing Councils  
01273 263009

Appendix 1(b) Copy of email sent to all subscribers of Planning Policy Newsletter and additional specific consultee's for the 2 SPDs. Date sent 26 June 2013

Dear Subscriber,

**WORTHING PLANNING POLICY NEWSLETTER**

Please find attached the latest edition of the Worthing Planning Policy Newsletter. You may have an interest in one or more of the areas of work currently being progressed, particularly consultation on two draft Supplementary Planning Documents:

- Draft Tall Building Guidance
- Draft Guide to Residential Development

The Newsletter, which provides links to all documents, also sets out information on the Strategic Housing Land Availability Assessment, which seeks to identify all development opportunities within the Borough.

Please use the contact information supplied on the Newsletter to submit any comments.

Yours Sincerely

Tracy Wigzell

## Appendix 2

### Consultation responses on Draft Tall Building Guidance SPD - June 2013

Respondent/ Organisation	Comments	Officer Response
<p><b>Roffey Homes (C/O Ben Cheal)</b></p> <p>Background (supplied by respondent)</p> <p><i>Roffey Homes Ltd is a Worthing based developer of apartments. We have been developing apartments in Worthing and the surrounding area for over 50 years.</i></p> <p><i>We have considerable expertise in redeveloping brownfield sites, having developed over 50 sites. These range from developments of 5 apartments up to 72 apartments.</i></p> <p><i>We are currently working on 2 apartment developments on Worthing seafront - 1 low rise and 1 of high rise. We are also designing two high rise schemes that will bring 160+ units to the town.</i></p>	<p><b>Principle of SPD</b> - Roffey Homes support the principle of this SPD. The lack of greenfield sites in Worthing requires that greater emphasis be put on seeking to maximise the redevelopment of brownfield land. There are many areas in Worthing that can support greater height if well designed and located in such a way as to not cause unreasonable effect on neighbours. The provision of this guidance will give support to the principle of providing taller buildings and gives clarity to what information is required to be provided.</p> <p><b>PART 1 – Introduction</b> <u>What is a tall building?</u> Agree with using the definition used by CABE and English Heritage (2007 Guidance)</p> <p>Whilst the comment on buildings being below 12m not usually being considered to be tall is welcomed, the key is whether they are substantially taller than their neighbours (as CABE guidance).</p> <p><u>Market Demand</u> Whilst the provision of tall buildings is very much linked to a buoyant property market and stable economy, no mention has been made of occupants demand for living at height in Worthing. Whilst London and regional cities have started to become more accustomed to higher residential tall buildings, this has largely been a ‘forced’ scenario to on those seeking residential accommodation in them. At a more regional level, particularly Worthing, there is a greater risk attributed to attracting people to purchase / occupy tall buildings. This is because demand for apartments, particularly on the seafront, is very much from those nearing or within retirement age. These occupants tend to spend more time within their apartments, and therefore prefer visual interaction with the local vicinity to provide more interest for them. The higher the building is, the less interaction occurs. It is important to mention that there is risk associated with providing tall residential buildings in Worthing as market demand is un-proven.</p>	<p><b>Noted</b> – it is pleasing to read that a local developer of tall buildings supports the principle of this SPD and the greater clarity it will provide.</p> <p><b>Noted</b></p> <p><b>Noted</b> – agreed. The CABE definition will be used as the main point of reference. However, the paragraph in question clarifies that proposals less than 12m would still be subject to usual planning considerations (including their potential impact on their neighbours).</p> <p><b>Amend</b> – As set out on page 12, the current level of developer interest in tall buildings helps to demonstrate fairly strong demand for this form of living. This level of demand may increase further given the demographic profile of the town and the fact that the respondent identifies those nearing retirement age as being the main source of demand (particularly for seafront apartments where some of the opportunities in the town are located). However, it is acknowledged that lack of proven demand over a long period of time could present a risk. Add sentence to the end of the 2<sup>nd</sup> paragraph on page 12 to state:</p> <p><b><i>Despite this, it will be vital that, at an early stage of development, promoters of tall buildings fully assess the market demand for their proposal.</i></b></p>

	<p>A notational reference is made to the Community Infrastructure Levy Viability Assessment in paragraph 2 of this section. The notational reference in the paragraph is '2' whilst the notational reference at the bottom of the page to which it relates is '1'.</p> <p><b>Part 2 – Assessment Criteria</b> Mention is made of weighting of criterion, but is not elaborated on. It is presumed that this is right and so can be assumed to be subjective and argued on each site.</p> <p><b>Part 3 – Locational Criteria</b> The definition of where 'very tall buildings' can be considered is too narrow, and fails to cover sites such as the Causeway, Durrington, which are not in the town centre or in close proximity to it. There should be more scope for inclusion of other areas.</p>	<p><b>Noted (amend)</b> – the reference within the footer on page 12 should be amended to read '2' rather than '1'.</p> <p><b>Noted</b> – as suggested (page 25) it is agreed that the appropriate level of weighting to be applied for each criteria will depend on the site / proposal in question.</p> <p><b>Noted (amend)</b> – whilst the most appropriate location for very tall buildings is most likely to be in, or close to, the town centre there is no reason why they could not be considered elsewhere subject to any proposals meeting the tests and expectations of the SPD. Propose revision to 2<sup>nd</sup> paragraph of 1b) page 29 to state:</p> <p><b><i>Subject to meeting the requirements of this SPD very tall buildings are more likely to <del>will only</del> be considered appropriate.....</i></b></p>
<p><b>The Worthing Society (C/O David Sumner)</b></p>	<p>Tall buildings have an overbearing presence on townscapes although the City of London may be acceptable in context. Coastal towns have an unhappy relationship aesthetically. The height of Manor Lea - the most acceptable high block - should be taken as a guide for maximum height in coastal towns like Worthing.</p> <p>We would like to see a Minimum Space Standards based on the model laid out in the original Parker Morris publication of some 40+ years ago which was adopted then allowed to slip. The Mayor of London's policy of the Parker Morris guidelines + 10% would be a good start for these modern times. Floor space in new build is currently the lowest in Europe.</p>	<p><b>Noted</b> – the SPD does not indicate maximum heights for any given area but does provide a clear indication as to how individual proposals will be assessed to ensure that they are of a high standard of design and that their height is appropriate to their setting.</p> <p><b>Noted</b> - The Council is keen to ensure that the floor space in new residential development in Worthing is sufficient to secure a satisfactory standard of accommodation for their residents. To help ensure this a Space Standards SPD was adopted by WBC in February 2012 and all development proposals (including those for tall buildings) will be expected to comply with this. This is highlighted within the design criteria checklist (p.59) of the SPD.</p>
<p><b>Marine Management Organisation</b></p>	<p>The MMO has reviewed the consultation document and we have no specific comments to submit.</p>	<p><b>Noted</b></p>

### Appendix 3

#### Consultation responses on Draft Guide to Residential Development SPD - June 2013

Ref	Respondent	Comments	Officer Response
GRD1	Internal Officer Response	Suggestion to include a specific paragraph In Section 3 relating to design within the context of heritage assets.	<p><b>Amend</b> - It is considered that this addition would improve the document and new paragraph 3.2 should be added to section 3:</p> <p><b><u>'Modern buildings can seek to distinguish themselves by contrast, or harmonise by reflecting prevailing character and design. In either circumstance, inadequately considered design, cost-effective materials and 'off the peg' details (such as windows and doors) can fail to result in a successful outcome in terms of the relationship of new development in the context of designated heritage assets. New development should be of a high quality which responds to the urban context and settlement pattern'</u></b></p>
GRD2	Internal Officer Response	Suggest that the guide be adjusted to address the issue of gardens in that that can be considered to be 'greenfield land'. Amendment should also help to clarify the tests the Council would apply to assess the acceptability (or otherwise) of any development proposals that would result in the loss of garden land.	<p><b>Amend</b> - Officers consider this amendment should be added to clarify the changes to the classification of garden land as greenfield.</p> <p>Amend second sentence of para 4.28 to read:</p> <ul style="list-style-type: none"> <li>• Garden space has a number of roles including the contribution to local character, <b><u>green infrastructure</u></b>, secure spaces for play.....</li> </ul> <p>Amend first sentence of para 4.29 to read:</p> <p>The NPPF at paragraph 53 allows LPAs to set policies to resist the inappropriate development of residential gardens (<b><u>defined as greenfield land</u></b>).....</p> <p>Add section to end of Para 4.28 to be amended as follows:</p> <ul style="list-style-type: none"> <li>• <b><u>An important consideration when considering the appropriateness of any proposal for backland development will therefore be whether the garden land in question is considered to be of significant importance in the urban structure, is of scenic importance or provides wildlife value. If one or more of these</u></b></li> </ul>

			<p><b><u>apply and the value of the green infrastructure is significantly eroded without adequate mitigation / compensation then its loss will normally be resisted.</u></b></p> <p>Amend 6<sup>th</sup> bullet point of para 4.32 to read:</p> <ul style="list-style-type: none"> <li>• Impact on natural habitat including trees, vegetation and wildlife <b><u>and any mitigation that might be required</u></b></li> </ul>
GRD3	Roffey Homes	<p><b>Paragraph - 4.11</b> It is wrong to assume that family homes should have 'direct ground floor access to a suitable area of private amenity space suitable for children to play safely and for the sole use of the occupants'. Such a definition does not represent the reality of existing development in towns and cities which have their own communal amenity space or are in very close proximity to suitable local amenities, ie playground, seafront, park etc.</p> <p>Whilst we agree that it is aspirational to have such direct access, we would argue that as long as suitable amenity space has been designed into the development, as Lifetime Homes or similar, and that the needs of families have been taken care of, then communal space is perfectly adequate. Additionally allowance must be made for being very close to parks, seafront and playground etc.</p> <p>We would argue that well designed communal space is actually preferable as it creates a greater opportunity for community.</p>	<p><b>Accepted in part</b></p> <p>It is not the intention of the Council to apply rigid standards to development but rather that each application will be treated on its own merit. However, as the respondent acknowledges it is the Council's aspiration to have direct access to private amenity space for family homes, particularly houses. In the case of flats/maisonettes the aspiration would be that they would be located on the ground floor and would have direct access to private amenity space.</p> <p>The final bullet point on page 27 of the draft SPD clearly states that where a family unit is proposed above ground level the applicants would be expected to demonstrate why this is justified and how they would meet the requirements of families with children. Para 4.13 goes onto state that where the position of a family unit above ground floor is accepted, balconies or terraces offering private amenity space should be suitable and safe for children etc. Additional information is also provided in the existing adopted guidance 'Space Standards' SPD about the balance between balcony space and communal space.</p> <p><b>Suggested Change</b></p> <p>Whilst the Council maintains this aspirations it is considered that the following amendments should be made to clarify the flexible approach the Council will take:</p> <ul style="list-style-type: none"> <li>• Amend the last sentence of para 4.11 to read 'It is <b><u>should normally</u></b> have direct ground floor access to a suitable are .....</li> </ul>

			<ul style="list-style-type: none"> <li>Amend 4<sup>th</sup> bullet point on page 27 as follows: '....units that are designed for family use should <b><i>normally</i></b> be provided at ground floor level ....'</li> </ul>
GRD4	Roffey Homes	<p><b>Paragraph 4.12 - Internal layout</b></p> <p>Agree with comments on bedrooms. Disagree with comments on living spaces being separate. The market suggests well designed open plan living spaces are in strong demand. To suggest otherwise is incorrect. The key is the ability for there to be space in other rooms to allow for another TV, home working etc.</p>	<p><b>Accepted in part.</b></p> <p>Whilst the market does in general point to open plan living there is also evidence of the benefit of having the flexibility to modify the space within a home to meet the needs of family life. That may mean having the flexibility to have open plan living space or with relative ease modifying the space to have a separate kitchen/dining/living area which would allow for some separation. It is not the intention of the guide to be prescriptive but rather to consider the flexibility of the internal space provided to meet the needs of the families living in them.</p> <p><b>Suggested Change</b> The last sentence of the first bullet point to para 4.12 should be amended as follows:</p> <p>'Evidence suggests that families benefit when adults and children are able to occupy separate living spaces and therefore <b><i>consideration should be given as to how the internal space can be flexibly used to accommodate this.</i></b>'</p>
GRD5	Roffey Homes	<p><b>Para 4.12 -Garden and amenity space</b></p> <p>Disagree with the comments on direct access to private amenity space.</p>	See officer response to GRD3.
GRD6	Roffey Homes	<p><b>Para 4.12 - Location of a family unit.</b></p> <p>Disagree with the comments on location of a family unit.</p>	See officer response to GRD3.
GRD7	Roffey Homes	<p><b>Paragraph 4.13 -</b> Disagree on the amount of private amenity space (20sqm) as this is unachievable in many apartments. Importantly, this also ignores Lifetime Homes requirements for communal space. Communal space that can be absolutely fine for families. The Lifetime Homes spatial requirements should be stated here rather</p>	<p><b>Accepted in part</b></p> <p>The 20sqm figure is derived from the Councils adopted Space Standards SPD which states (para 6.5) that a minimum of 20sqm of private outdoor space should be provided for each flat. It goes into state that with taller and larger flatted development there is a desire to have at least some element of private outdoor space in the form of a balcony or terrace. It goes on to state the suggested size and dimensions and to state that any shortfall in the 20sqm</p>

		than your own 20sqm figure.	<p>should normally be made up in the form of suitable communal space.</p> <p>Amend last sentence to para 4.13 to cross reference the Space Standards SPD as follows:</p> <p><b><u>'A minimum of 20m2 of private amenity space should be provided per flat <i>as detailed within the Council's Space Standards SPD.</i></u></b></p>
<b>GRD8</b>	<b>Persimmon Homes</b>	Para 1.2 correctly identifies that the NPPF is explicit in stating that SPDs should not be used to add unnecessarily to the financial burdens on development. However, there are examples throughout where the document goes beyond simply "amplifying" the existing policies within the Core Strategy.	<p>Noted. It is not the intention of the SPD to add to the financial burden of development but rather provide clarity to the adopted Core Strategy policies. Two examples given by the respondent are addressed below.</p>
<b>GRD9</b>	<b>Persimmon Homes</b>	<b>Lifetime Homes</b> - Page 16 states that all new residential development will be required to meet Lifetime Homes standards. It is important to note that this is not a requirement of the Council's adopted Core Strategy and that CS Policy 8 simply requires the appropriate mix of dwellings which may include some that meet Lifetime Homes standards. It is our view that the draft SPD is seeking to introduce an unnecessary financial burden on development, contrary to Government advice. As such, the reference to all new residential development meeting Lifetime Homes standards should be removed from the SPD.	<p><b>Accepted</b> - It is acknowledged that the wording of the draft SPD goes beyond the requirements of CS Policy 8 and changes are proposed to avoid the setting of additional financial burdens through an SPD. However, local housing evidence (SHMA etc) outlines the need for housing that meets the specific housing needs of Worthing's population and that new housing should be designed to adapt to the changing needs of the occupants throughout their life. For this reason, the Council continues to support the principle of Lifetime Homes and, as such, the SPD (as with the Core Strategy) will continue to encourage this.</p> <p>These design standards are already incorporated into the adopted Space Standards SPD. It is also noted that the Governments recent consultation on Housing Standards is considering the role of these design standards and, as a result (and now acknowledged within the SPD) this may need to be reviewed in the future.</p> <p><b>Proposed Change.</b> Amend the shaded box on page 16 so that it reads:</p> <p><b><u>'New residential development should demonstrate how the design features of the Lifetime Homes Standard have been considered.'</u></b></p>

			<p>Amend 1<sup>st</sup> sentence of para 3.11 to read:</p> <p><b><i><u>'New development should seek to incorporate the principles of Lifetime Homes Standards.'</u></i></b></p>
<p><b>GRD10</b></p>	<p><b>Persimmon Homes</b></p>	<p><b>Sustainable Energy</b> - Page 23 expects applicants of 10 dwellings or more to provide a minimum of 10% of energy on site from renewable sources. It is relevant to note that whilst this reflects the requirements of CS Policy 18, the South East Plan (on which this requirement is justified) has now been revoked. It is our view that the Council should make the policy more flexible by making reference to viability considerations (as per CS Policy 18) and by allowing for other ways of reducing energy consumption (e.g. through improved fabric) where on site renewables would not be appropriate or feasible.</p>	<p><b>Accepted in part</b> - This section does not seek to add to the adopted policy but rather give more detail in terms of the application of the policy. It should be noted that whilst the South East Plan, which informed the local policy position, is now revoked the underlying evidence of the South East Plan remained valid.</p> <p>Despite this, it is accepted that thinking in this regard has moved on somewhat and there should perhaps be less emphasis placed on the 10% requirement within the SPD. Changes will be made to achieve this and to reflect the changing approach Policy 18 and the SPD already refer to the energy hierarchy approach and the emphasis on reducing energy demand in the first instance.</p> <p>It is acknowledged that the Government is currently considering these targets as part of the current review of Housing Standards. However, until such time that a change is made it is considered to be appropriate to retain this local target but accept that it may need to be applied in a flexible manner. As such, the Council will continue to consider issues of viability and alternatives to achieving the highest practical level of sustainability on each site but this must be backed by evidence from the applicant.</p> <p><b>Proposed Changes</b> To reflect the wording in CS Policy 18, the changing emphasis and the avoidance of extra financial burdens being set within an SPD the shaded box on page 23 should be amended to remove reference to the 10% requirement and read as follows:</p> <p><b><i>'The Council will expect all new development to include sufficient on-site renewable energy generation in line with Core Strategy Policy 18.'</i></b></p> <p>Paragraph 3.24 to be amended to read:</p>

			<p><b><u>The Core Strategy encourages 10% on site renewable energy provision on developments of 10 or more dwellings or 1,000sqm. In the Areas of Change and other major development the expectation is that there will be greater opportunity to secure onsite or off-site renewable energy.</u></b></p> <p>Amend 1st sentence of para 3.25 to read:</p> <p><b><u>The 40% level of renewable energy provision will be based.....</u></b></p> <p>Amend first sentence of para 3.26 to read:  <b><u>In terms of meeting the 10% target Renewable energy can be achieved by.....</u></b></p>
GRD11	<b>The Worthing Society</b>	We would like to see a minimum space standards based on the Parker Morris publication of some 40+ years ago which was adopted then allowed to slip. London's policy of the Parker Morris guidelines + 10% would be a good start. Floor space in new build is currently the lowest in Europe.	<b>Noted</b> - Officers note the issues raised in this representation but the Council's existing adopted Space Standards SPD adequately deals with these issues.
GRD12	<b>West Durrington Consortium</b>	<b>Lifetime Homes</b> - Text and proposed policy related to para 3.11 calls for <i>all</i> homes to be built to this Standard. This is overly draconian, not needed for every home and actually counter productive in meeting certain housing needs. There is particular concern over the achievement of these standards on smaller units. The approach taken by the Council runs contrary to Government views.	<b>Accepted</b> - see officer comments and suggested changes at GRD9.
GRD13	<b>West Durrington Consortium</b>	<b>Renewable Energy</b> - The seeking of 10% on-site renewables in the SPD is a rather outdated proposition. The origins in the Core Strategy are with the now revoked South East Plan. Increasingly research has shown that the way to CO2 reduction is through minimising the energy needs of a property – building in a fabric first approach.	<b>Accepted</b> - see officer comments and proposed changes at GRD10.

		<p>Govt is increasingly recognising this. The DCLG <i>Next Steps to Zero Carbon Homes–Allowable Solutions (Aug 13)</i> document is extremely 'light' on on-site renewable energy generation. The first base on the Zero Carbon Pyramid is a focus on Energy Efficiency (insulation, efficient heating and lighting etc). This combined with: sustainable sourcing of materials; suitable policies on waste minimisation; and measures to ensure water efficiency is the way forward.</p> <p>Installation of domestic renewable energy systems will soon be seen as a householder choice – they are generally not the suitable solution for seeking to reduce CO2 on new build homes for sale on the market or indeed in the affordable housing sector. The existence of the proposed policy should be seriously reconsidered in the light of this.</p>	
GRD14	Marine Management Organisation	Acknowledgement but no comments	Noted
GRD15	Government Consultation	In response to recent publication – see next column.	<p>New paragraph 1.6 to be added to Introduction to state:</p> <p><b><u>At the time of drafting this SPD officers were not aware that the Government was intending to publish its 'Housing Standards Review' consultation. Whilst this, in many respects, helps to endorse the approach being taken by the Council there are other local elements which may not necessarily align with the national agenda in the future. If these suggested changes are taken forward it may be necessary to review this SPD and local standards in response to any changes made to housing design standards at the national level.</u></b></p>

## APPENDIX 4

### Guide to Residential Development

#### Draft response to Questions raised at Worthing Planning Committee 2/10/13

A Draft Guide to Residential Development Supplementary Planning Document (SPD) was published for consultation in the summer. Members of Worthing Planning Committee (Oct 2<sup>nd</sup>) considered a report which explained this process and set out the amendments that were proposed in response to the comments that were received. Members were broadly content with the document and its revisions but raised three questions which are set out below. Members of the LDF Working Group will be asked to consider these before any final (minor) amendments are made prior to being forwarded to the Cabinet Member for approval.

#### **Member's Comment**

***In respect to potential developments on garden land is there a need for a size threshold below which development would not be considered appropriate.***

#### **Officer Response**

The SPD sets out clearly that, in general, backland garden development is an inappropriate form of development and will be resisted in most cases. It goes on to set out the criteria against which any such proposal would be judged. It is not considered that having a garden size threshold would assist in assessing the appropriateness of development as it is the 'value' of the garden that should be tested rather than its size. A garden could be smaller than another but given its context and character could more easily lend itself to an appropriate form of development when compared to a larger garden which was overlooked and provided significant biodiversity and character value.

It is considered the criteria which would be used to consider any proposal (including intensity of development, overlooking, impact on existing residential, amenity, loss of valued green infrastructure) are considered sufficiently robust as to resist inappropriate forms of development.

In this regard, officers are of the view that the guidance and expectations are clear and that it would not be necessary to make any further amendments to the SPD.

### **Member's Comment**

***Family units need to have a link to outdoor recreation space in the form of private garden space for children to play safely in.***

### **Officer Response**

The SPD (paragraph 4.12) makes it clear that *'family homes will need to have direct access to useable private amenity space or garden for the sole use of the household. In most cases, this will be the provision of a garden area. The amenity area will need to provide for general amenity, a safe play space for children, for drying of clothes and storage. The Council's Space Standards SPD specifies the minimum standards for gardens for houses and sets out standards for balconies and terraces.'*

In this regard, officers are of the view that the guidance and expectations are clear and that it would not be possible to make a stronger requirement within the remit of an SPD.

### **Member's Comment**

***A concern was raised that larger sized flats could be considered suitable for families.***

### **Officer Response**

The intention of this part of the SPD is that it would provide some added clarity to the Core Strategy Policy 8. However, defining 'family housing' has been difficult and it has been widely agreed that it is nearly impossible to provide a precise definition given the nature of 'families' and the complexities of the housing stock.

The key evidence base in terms of the identified housing need for Worthing is the Strategic Housing Market Assessment (SHMA). The SHMA, which has recently been updated (2012), points to the need in Worthing for larger family homes and defines family housing to include all properties with three or more bedrooms. In addition, in terms of housing types the SHMA supports the need for more 'houses' rather than flats given the emphasis on the building of flats in Worthing over the last decade. For these reasons, and as explained in the SPD, 'family housing' in the context of Worthing would generally be considered to be 3+ bed houses (rather than apartments/flats).

However, in line with advice and best practice from elsewhere and concerns that had been raised previously over the loss of some existing smaller family dwellings, officers were keen to ensure that the guidance provided enough flexibility to allow for some slightly smaller dwellings and/or apartments/flats to be considered appropriate for 'family housing' providing that they could demonstrate adequate internal space and outside amenity areas. This will be more relevant in central locations.

The SPD, in line with CS Policy 8, seeks to encourage the provision of family homes in the areas outside of the town centre/edge of centre areas and it is expected that such dwellings will be the predominate housing type in all new residential developments in those locations. In general, family homes in these locations should be 3 bed plus dwellings with an appropriate level of internal floorspace and direct ground floor access to a suitable area of private amenity space. They should normally be provided as houses rather than flats. However, it is acknowledged that in town centre locations the provision of family dwellings is more likely to be delivered in the form of flatted/ apartment developments.

As such it is acknowledged that certain sections of the SPD can be reworded to address these concerns and reaffirm the Council's expectation that 'family homes' will largely be considered to be 3+ bed houses (not flats/ apartments).

The following minor amendments are suggested:

The text box on Page 26 defining 'Family Housing' to be amended as follows:

***'A family home is generally considered to be a 3(+) bedroom house with a suitable layout and level of internal space together with accessible usable amenity space to meet family needs.'***

At paragraph 4.10 amend the first sentence to read:

***'In light of the SHMA evidence and the need for larger family homes in the borough, it is considered that family homes are dwellings of three or more bedrooms and that these would usually be houses rather than apartments. Whilst the Council will, in general, apply this definition it is clear from research that a family home is more than a number of bedrooms.'***

At para 4.12 amend the final bullet point to read:

***'House or Flat – Research indicates that the aspiration for most families is for houses rather than flats. 'However, whilst the expectation is that family homes should in general be in the form of houses it does not necessarily mean that in some circumstances flats/apartments cannot provide a source of family housing providing that adequate internal and external space standards are met.' This is particularly so when included within town centre and edge of centre developments.'***

At para 4.15 amend the final sentence to read:

***'It is acknowledged that in these circumstances it is possible that family homes may be provided in the form of apartments but it is essential that adequate internal and external space is provided.'***