

CONSULTATION STATEMENT

Consultation held between 12 August 2013 and 23 September 2013.
 The Council's Local Plan database was informed of the consultation.
 Two articles were placed in the local newspaper during the consultation period.
 The following responses were received:

Representation name	Representation organisation	Representation comments (summarised where appropriate)	Council comments
1. Ted Maddex	<i>Hertfordshire County Council- Health & Community Services</i>	Hertfordshire County Council Accommodation Solutions Team welcomes the new space standards for dwellings and bedrooms. These will increase the number of dwellings able to accommodate residents with mobility difficulties, wheelchair users, and those requiring extra equipment for disabilities.	No comment
2. Stephen Hall	<i>Highways Agency</i>	We have no comments to make as your housing space standards will not have an impact on the Strategic Road Network.	No comment
3. Malcolm Briggs	<i>Member of the public</i>	I fully endorse the proposed enlarging of dwelling rooms, garages and gardens. It's a pity this was not in force earlier.	No comment
4. Margaret & Clive Baker	<i>'Century' Plot holders at Hammondstreet</i>	We believe increasing the minimum living spaces for new and improving properties as outlined in these documents is a step in the right direction and will enhance the quality of life for future residents.	No comment
5. Syd Ashley	<i>Member of the public</i>	Bedsit/studio area is more generous than it needs to be, this would not equate to the kind of room size often found in University Halls etc and continentally areas of 25 sqm are often applicable in densely populated areas provided there is some communal external amenity space included or very nearby. This is the only way you can make this type of accommodation cheap/affordable. In respect of the external amenity space, the absence of adequate provision in the current developments in Hoddesdon town centre is very evident along with the complete failure to provide any landscaping features to soften the bulk of the buildings & make up for the general openness that existed previously.	The Council believes that it is not reasonable to compare studio flats to temporary accommodation found at university halls and densely populated areas of larger cities, particularly where people will be living in smaller accommodation for longer periods due to difficulties obtaining mortgages. The Council considers that there should still be decent living accommodation, with the ability to have room for storage, for smaller property sizes as well.
6. James Barham	<i>Bayfordbury</i>	I have no adverse comments to make about the dwelling sizes proposed although I think that the bedroom sizes are disproportionately large when set against the minimum floor areas set out in box 1. It is more important to state the objectives that you wish to see as distinct from imposing mathematical formulae. I am concerned about the private garden sizes that you require in box 4. Some allowance must be made for the communal open spaces that will be provided in the garden city layout. I am set against designing	Although the Council agrees that it is imperative to set objectives for future development, it is also beneficial for many home builders that a set of minimum standards are established. Without standards or policy guidelines we consider that the Council is liable to losing appeals for development that is considered inappropriate. The Government's intention for a national set of

		<p>schemes to mathematical formulae and I thought that the Essex Design Guide and Cheshire Design Guide did away with designing by numbers and looked instead at performance. Box 4 provisions are unduly restrictive and should be replaced with an amenity space objective statement, with the freedom given to designers. The imposition of these standards takes us back to the design criteria of the 1960s. The requirement for 20 square metres of amenity space per flat is excessive taken in isolation. The requirement to provide what appears to be separately identified private amenity space for flats with more than two bedrooms is particularly restrictive. The paper misses an opportunity to identify how wheelie-bins should be accommodated in high-density developments. Often garages for such schemes will be remote from the accommodation itself and you have implied that the bins could be stored in the garages; and some design guidance should be given as to how wheelie-bins can be accommodated in a visually acceptable manner. Perhaps undertake research to find examples that overcome the bin storage problems.</p>	<p>standards clearly indicates that there should be some form of building standard. As can be seen from the justification report the 20sqm garden size proposed for Broxbourne is not unique to this local authority and we consider that this supports Council aspirations for more garden city style developments. Regardless as to whether you live in a flat or home, you should still have amenity land/garden land provision. It should be noted that the Council has prepared a Waste SPG which gives guidance on bin storage areas in both commercial and residential developments.</p>
7. Killian Gallagher	<i>George F White on behalf of Whitehouse Farm</i>	<p>My clients welcome the approach to residential standards. They feel that a robust plan led approach is essential in securing the residential amenity of future occupants of the Borough. My clients feel that generous private open space is essential in facilitating a good level of amenity for future residents. My clients feel that the internal space standards proposed comply with what they feel to be good practice in the industry.</p>	<p>No comment</p>
	<i>Barker Parry on behalf of Leach Homes</i>	<p>The aspirations to which you refer are not found in the existing Local Plan and your Council is without an adopted replacement. I fail to see how your proposals can be properly considered as SPD. SPD must relate to development plan policies. It is not anticipated that all new development will follow "garden city principles" set out in NPPF. Rather it is the overall effect created by well landscaped settings which create these cities. Inappropriate to introduce SPD in light of no Local Plan and DCLG's proposals. You fail to recognise paragraphs 103 to 104 of DCLG consultation in terms of viability and complexities of various local authority standards. Just because bedrooms are increased doesn't mean value of house increases but dwelling size will have increase on external and internal build costs. There is no one-size-fits-all property and properties have been deemed acceptable below proposed standards. Increasing bedroom sizes increases ground floor sizes which would increase overall size by 32%. This will also utilise more land. Garden city layouts should emphasise public rather than private amenity areas and this is also likely to raise viability concerns. Perhaps larger garages should be</p>	<p>It is considered justified to update the Council's standards where justified in line with local Policy and NPPF principles. It is considered that garden city principles apply to both private and public spaces to ensure appropriate living conditions. Without any definitive national standard or internal detailed design guidance, the Council believes that maintaining some form of local standard is essential. No concrete evidence has been provided as to whether the standards would affect viability or profitability of schemes. As the standards accord mostly with the DCLG proposed Level 1 standards and recent property building it is considered that they are viable. The Council understands that more land will be required for larger properties but this would also prevent town cramming and over-concentration of development in existing urban</p>

		7m by 3m to reduce parking on driveways etc.	areas. However the Local Plan also recognises the flexibility of the SPG and its standards and therefore the fact that there will not be one-size-fits-all. The Council does not consider at present that garage lengths need to be increased but will review this in the future.
8. Tom Pike	<i>CBRE on behalf of Cheshunt Properties Ltd (Sub of Dandara)</i>	The standards are generally greater than HCA Housing Quality Indicators, which also provides a flexible range. The imposition of rigid standards should be properly considered and balanced with other considerations, for example site-specific circumstances and affordability. The contents of the SPGU should be applied flexibly, as required by the Local Plan and NPPF. Additional text should be incorporated in the SPGU which clarifies that it is to be applied flexibly. Dandara considers that failing to apply the standards flexibly could impact on the affordability of new homes, resulting in fewer houses being delivered, therefore further reducing housing choice, and be inconsistent with the NPPF.	The standards should be treated as minimum; however Policy H8 of the Local Plan sets out the special circumstances to be applied to applications that may not accord with the SPG and it also provides detail on flexibility that will be applied to the SPG. Therefore it is considered that no additional flexibility statements be introduced in order to avoid duplication. It is considered that these standards should be complied with unless exceptional justification can be demonstrated. The HCA standards have been considered by the Council but do not apply to both market and affordable housing. Their standards do not entirely support the Council's aspirations or objectives.
9. Jane Gardner	<i>Marrons on behalf of Leach Homes and LIH</i>	It is considered that a Viability Assessment is an essential pre-requisite to any proposals for an increase in space standards. The report to the Committee considering this issue was rather dismissive of build costs. It must be recognised that sales prices of new homes are based on the market value of similar sized properties in the locality. Just because a dwelling costs more to build does not mean that it will be possible to secure a higher sales price. It would be inappropriate for the Council to proceed any further until the Government has determined how it wishes to proceed with its housing standards consultation. It is essential that the approach adopted fully accords with national policy, which it clearly does not. Some local households may aspire to larger family homes and developers can and do build such homes but they may be unaffordable to those aspiring to them. Other considerations, such as the stamp duty bands, will also have an impact on people's choices. If the size of a dwelling is perceived on the basis of the number of bedrooms, purchasers may not necessarily see the value in paying more for additional floorspace. Just because bedrooms and private gardens are larger does not mean that they will <i>"be better able to meet the needs of occupants over their lifetimes"</i> , for example, the elderly find the house and garden are too large to maintain / afford. At	The Council would firstly like to point out the NPPF's objectives for seeking high quality design and a good standard of amenity for all existing and future occupants of land and buildings (para 17). It is considered that the SPG standards avoid unnecessary prescription (para 59) and it is right to point out that DCLG appear to have aspirations for a set of standards for new properties even if it is on a national level. The proposed standards are less detailed than DCLG's proposals and could allow an element of flexibility in exceptional circumstances. The Council does not agree with your interpretation of para 153 of the NPPF, SPG/Ds aid good design and provide useful guidance for many applicants. The SPG rather than Local Plan provides flexibility as well. The supporting assessment shows that applications approved in the last 30 months have been more aligned to proposed standards and therefore new buildings should not be too dissimilar in terms of size and

		<p>a time when the Government has successfully introduced schemes to assist first-time buyers it is a matter of concern that Council is seeking to increase size and hence cost of starter homes. It is essential that the Council removes all references to minimum dwelling sizes to ensure house builders have flexibility to provide dwellings which are suitable for local housing market and needs of majority of purchasers. Increasing bedroom and bathroom sizes invariably increases total floor area which may result in ground floor with all the implications for density and capacity set out above. It's been standing practice to provide distance between dwellings; the Council's stipulation of 10 metres as minimum depth of private rear gardens may not have significant impact on most residential developments. However total area specified as minimum useable size will have a significant impact on densities and therefore capacity of sites & land to be allocated /released from Green Belt. It must be recognised that not everyone wants a large garden and house builders should have freedom to meet perceived needs of customers. House builders are aware that garages have increased in size to accommodate modern cars. No objections are raised in principle. However even when saying that standards proposed can accommodate a family car and storage area but then require that even when alternative arrangements are made for storage, provision is made for a minimum internal area of 18 sqm is nonsensical. In such circumstances it is considered that, at least, internal floor area be reduced to 15 sqm.</p>	<p>price than local area. The Council does not believe that these standards place a restrictive burden on property buyers. They are very similar to the lowest level being considered by DCLG and properties already being provided in the borough. Although the Council may consider smaller property types appropriate, these are to enable regeneration schemes rather than on new larger developments. Improving the living conditions of new homes prevents people from using Government schemes but instead enables better choice in the off-set. The increase of bedroom sizes resulting in the increase of dwelling sizes is a step forward to improving conditions generally. There is a presumption that larger properties may be a burden on elderly population but the new standards would ensure homes for life for a variety of occupiers. The Council recognises that green belt land is required for new development and would rather see improving living standards and dwelling sizes on green belt then cramped forms of development in urban areas. The Council believes that garages which either solely house vehicles or with limited storage should always be at least 18sqm in size. Without knowing when or how DCLG may publish its standards the Council considers it sensible to continue with its proposed changes. The Government's consultation has suggested that the Council's dwelling size proposals are at least comparable to Level 1 and are far less complicated and inflexible.</p>
10. Valerie Scott	<i>CGMS on behalf of Crest Strategic Projects</i>	<p>Consider that a rigid set of space standards can have severe implications on the cost and viability of schemes particularly in relation to small sites and this can hamper high standard of design in terms of layout and design of homes. It can also hinder opportunity of providing good public realm and providing efficient layout which is not dictated purely by having to achieve rigid standards. If space standards are too high or applied too rigidly this will increase cost of development and result in increase in house prices. In designing schemes particularly small or awkwardly shaped sites it is not always</p>	<p>The Council agrees that there will be exceptional circumstances where these standards may not apply but it is the intention that these standards try to avoid awkward and small sites coming forward which usually lead to town cramming and densely populated schemes. The Council considers that the standards proposed are not over prescriptive and instead provide a good basis and guidance for house builders. This</p>

		<p>possible to meet a set of rigid guidelines. If these are prepared they should be used as guidelines and not be unduly prescriptive in how they are applied. Table has been prepared comparing various space standards which result in CGMS proposing alternative standards of a slightly lower level. Would ask Council to make it clear in guidance that standards are for guidance only and that some flexibility may be allowed depending on individual circumstances and to ensure high quality design. Width of bedrooms is too prescriptive as is amenity areas for flats that are considered family accommodation. Penthouse flats often have 3 bedrooms with access to a generous balcony or roof terrace. Recommend that SPG states that flats of more than two bedrooms should 'normally' be positioned at ground floor with access to private amenity space rather than being mandatory. 20m² per flat is generous and may not be achievable. This shouldn't be mandatory but "normally" should be inserted. Flats in town centres or conversion schemes may not provide this amount.</p>	<p>seems to be supported by DCLG's proposals for a national set of standards. The table proposed has only taken into consideration a handful of standards (including a handful of Everest plot number standards), not all of which would be considered applicable or appropriate to Broxbourne, particularly London standards. The narrow margin of difference between the standards in the table and those proposed in Level 1 of the DCLG consultation document, means that in the interim standards will not be altered based on this consultation representation. Without knowing when or how DCLG may publish its standards the Council considers it sensible to continue with the proposed document. The DCLG consultation has suggested that the Council's dwelling size proposals are at least comparable to their Level 1 standards and are far less complicated and inflexible. The standards should be treated as minimum; however policy H8 of the Local Plan sets out the special circumstances to be applied to applications that may not accord with the SPG and flexibility that will be applied to the SPG. Therefore it is considered that no additional flexibility statements or words to the effect of 'normally' need be included within the consultation document in order to reduce duplication. It is considered that these standards should be complied with unless exceptional justification can be presented.</p>
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