

Supplementary Planning Document – Housing Size and Type

Schedule of Representations and response

	Respondent	Para	Representation	Response
1.	English Heritage	General	No comments	Noted
2.	Mr C Narrainen	General	Agree with document	Noted
3.	Staines Town Society	General	No objection to SPD and supports its conclusions. Regret it does not consider the housing needs of those with disabilities. They hoped this would be covered in another SPD.	<p>Support noted.</p> <p>Policy HO4 (c) requires a proportion of dwellings that are capable of meeting the needs of people with disabilities to be included within housing schemes. It was felt this part of the Policy was already sufficiently clear and did not need further explanation.</p> <p>No change.</p>
4.	Cllr Ian Beardsmore	General	<p>Suggestions for amending Policy HO4 are given:</p> <ul style="list-style-type: none"> a. To use a threshold of 6 dwellings instead of 4 when the policy will apply; b. A limit of 30% on 1 bed units in any scheme; c. At least 30% three or more bedroom units in any scheme; d. In schemes of 10 or more dwellings require 10% as suitable for people with disabilities. 	<p>The role of an SPD is to amplify existing policy. It cannot be used to change the policy itself.</p> <p>The detailed guidance in the SPD will in effect achieve the limitation of 1 bed units and increase family units as the suggestion proposes.</p> <p>It was never intended that the SPD sought to deal with sub-point (c) of Policy HO4 which deals with the needs of those with disabilities. Adding a percentage figure when no specific figure is given in the Policy would go beyond what an SPD could reasonably specify in this case.</p> <p>No change.</p>

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5.	Linden Homes Cllr D Patel LOSRA	General	<p>Several comment that housing needs generally and the nature of the Borough varies from area to area. Therefore the type of new housing needs to reflect this and flexibility is required in applying Policy HO4.</p> <p>Cllr Patel comments that the type of people who might live in central Staines would be different to those wanting to live in Sunbury where there is nothing to attract those who generally live in flats, e.g. young people without children.</p>	<p>One of the important aspects of the guidance is to emphasise the importance of development having regard to the character of an area and thereby recognising the scope for some flexibility in dwelling mix – albeit that overall identified needs have to be met across the Borough as a whole. This is reflected particularly in paragraph 5.2 (4).</p> <p>A detailed housing needs survey undertaken for the Council in December 2006 showed demands in all areas of the Borough for all forms of housing. There is no evidence to support the view that certain types of housing are not needed in particular areas.</p> <p>No change.</p>
6.	Linden Homes	General	<p>Comment that the evidence base on housing need was produced in 2006 and is therefore quite old and not up to date.</p>	<p>The Council has published a background document to the draft SPD. It has a publication date of January 2012. It draws on various sources of information to provide evidence of current needs and trends in provision. This document is referred to in para 3.3 of the SPD.</p> <p>No change.</p>
7.	Surrey County Council (SCC)	General	<p>Comment that sub-point (b) of Policy HO4, which refers to a need for 400 extra care units from 2006-2026 needs to be readjusted to take account of provision already made.</p>	<p>It is not the role of SPDs to introduce amendments to the policies they are elaborating. The need for any change would need to be dealt with separately.</p> <p>No change.</p>

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8.	Cllr I Beardsmore	2.2	Comment refers to paragraph 6.22 of the Core Strategy which states that the general requirement for 80% 1 and 2 bed units may not apply where affordable housing is proposed as in that case a greater mix of larger dwellings may be required. Cllr Beardsmore comments that this piece of advice is not working.	<p>It is recognised in the background research that the right mix of affordable housing has not so far been fully secured. Para 5.8 of that document refers to 7 causes for this. One which is particularly significant is the time between schemes coming forward (when negotiations on dwelling mix takes place) and the time they are built. Several years can elapse and much of what has been completed in the last 5 years was approved prior to the adoption of the Core Strategy and Policies DPD in February 2009.</p> <p>Nevertheless it is one of the purposes of the draft SPD to provide much more specific guidance on the mix of affordable dwellings required, including the internal space by reference to the number of people they can accommodate.</p> <p>No change.</p>
9.	LOSRA	3.2	Include date of Housing Needs Assessment.	<p>Agreed.</p> <p>Proposed Change: Add date of December 2006 and also refer to Housing Market Assessment of January 2007.</p>
10.	Cllr I Beardsmore	3.4	The conclusions to retain Policy HO4 in its current form for private provision is wrong since the evidence is that there has been a net loss of 3 bed housing since 2006 with no sign of change. Reliance on extensions to small properties to fill the gap is wrong as some accommodation is not actually provided as bedroom space but for home-office and social living space.	<p>Comment has already been made that it is not the role of SPDs to change the policies they seek to elaborate. It has also been explained above that much of what has been completed in the last 5 years was approved prior to the adoption of the Core Strategy and Policies DPD in February 2009.</p> <p>It is recognised that Policy HO4 needs to be applied with greater regard to the size of affordable dwellings required, character of the</p>

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				<p>area and avoiding an undue focus on flats/small unit where that may conflict with the character of an area and needs generally.</p> <p>It is judged that the SPD will help secure the right outcomes in applying the policy and the policy itself does not need changing. Much of the thinking behind the SPD has been informally applied for a year or more and as recently approved schemes are built, completions figures will begin to reflect a dwelling mix in line with Policy HO4 and character considerations in Policy EN1.</p> <p>No reliance as such is being made on extensions to provide larger dwellings, but it is simply a fact that cumulatively extensions do lead to a greater proportion of larger dwellings in the housing stock over time. Irrespective of how particular accommodation is used the additional floorspace provides flexibility for present and future occupiers to meet a variety of space needs. The approach of providing an SPD to support the implementation of policy to secure the right mix of dwellings in the Borough is considered appropriate.</p> <p>No change.</p>
11.	LOSRA	3.5	The second sentence should have the word 'generally' inserted as follows: 'However, no more than one third should generally be 1 bedroom'. This is to allow a degree of flexibility.	<p>As drafted the sentence puts an absolute limit on the proportion of 1 bedroom units. Addition of the word 'generally' would allow for that limit to be increased. However, there is no evidence to suggest the proportion should be greater.</p> <p>No change.</p>

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12.	Cllr I Beardsmore	3.5	Disputes evidence that shows a need for 80% 1 and 2 bed accommodation.	<p>Evidence for 80% 1 and 2 bed accommodation is drawn from a wide range of data sources including a Housing Needs Survey and population projections. The figure of 80% is based on a judgement of this evidence. It also recognises that the amount of additional housing over the 20 years from 2006-2026 is relatively small (3320 dwelling – 8%) when compared to the existing housing stock of 40,000. This means that any significant change to the composition of the overall housing stock requires a significant focussing of the net additional dwellings on those types of dwelling for which there is a greater need. The figure of 80% is considered to be about right to meet the significant growth expected in smaller households.</p> <p>No change.</p>
13.	Cllr I Beardsmore	4.2	Comments on the size of affordable dwellings required in terms of bedroom and person numbers and states they cannot be justified.	<p>The text requires affordable dwellings in the following mix:</p> <p>2 bed (4 person) 66% 3 bed (5 person) 31% 4 bed (6/7 person) 3%</p> <p>The percentages reflect current patterns of re-lets of accommodation to those in priority need category A-C (see Table 9 of the Background Document to the SPD). The person numbers specified reflect the need to ensure sufficient internal space and therefore flexibility in the new accommodation which best match requirements of those on the Housing Register. The figures are based on sound evidence.</p> <p>No change.</p>

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14.	LOSRA	6.23	Comments that if housing extensions meet the need for extra accommodation it demonstrates a deficit in family housing provision. Whilst accepting the need for 1 and 2 bedroom dwellings, this need should merely inform decision making not drive them.	<p>Extending existing homes has always been a way people can enlarge/adapt an existing dwelling without the need to move and clearly contributes to the stock of larger homes generally. The planning system provides the scope to try and strike the right balance between need and actual provision when making decisions about new housing. The SPD needs to express guidance in clear terms so that the right outcomes are achieved having, of course, regard to other policy considerations. It is considered the way the SPD has been expressed will best assist the successful delivery of the policy.</p> <p>No change.</p>