

Dear Sirs

Re. planning application ref: APP/18/01033 - OBJECTION

Please accept the following statement as our deputation. Whilst not objecting to the principle of development, we object to the current form of the proposal to potentially overdevelop the land to the rear of Castle Avenue, based on the following deviations from accepted standards:

Technical standards:

The Government's Nationally Described Technical Standards are minimum area standards for new homes, designed to safeguard prospective owners and tenants. The Standards are there to ensure that housing is fit for purpose in terms of daily life and physical and mental wellbeing; providing new housing stock below these standards is contrary to common sense and sustainability. There can be no community benefit to allowing the construction of homes which are not fit for purpose and this is highlighted in these current times where people will rightly expect to be able to work flexibly.

Whilst there is nothing inherently bad about appropriate development sites, it is surely our civil duty to ensure that new housing meets sensible minimum standards. It is particularly important for HA building stock where, for reasons beyond the control of future tenants, prospective occupants have no say or ability to refuse substandard homes. Some of the proposed accommodation is in excess of 25% below minimum housing standards, leading to inadequate living space and we would urge the planning authority (whose role it is to safeguard the borough in development terms) to assume their public duty and require that all proposed accommodation meets these minimum standards.

Providing substandard homes might improve profit margins or more concerningly disguise a non-viable development site as being viable. Either way, building in societal problems for future generations is unacceptable and should not be supported.

The current plans include a substantial majority of dwellings which fall short of the Government's Technical Housing Standards, leading to below minimum standards for living space, which cannot be good for people's wellbeing. These are new dwellings and it should not be beyond the capability of the developer to provide designs which comply with important national standards for the **minimum provision** of dwelling standards.

The table below sets out the areas of proposed units compared to the Nationally Described Standards, which have been adopted by Local Authorities across the nation:

House type	Technical Housing Standard minimum size	Persimmon Homes Proposal	Difference (m ²)
Alnwick HA 2B4P	79	59	-20
Alnwick 2B4P (private)	79	59	-20

House type	Technical Housing Standard minimum size	Persimmon Homes Proposal	Difference (m ²)
Chedworth 4B6P (private)	106	113	+7
Clayton cnr 3B5P (private)	93	92	-1
Hanbury HA 3B5P	93	70	-23
Hanbury 3B5P (private)	93	70	-23
Kendal 4B6P (private)	106	110	+4
Lumley HA 3B5P*	99*	112*	+13*
Moseley 2B4P** (private)	79**	67**	-12**
Souter 3B5P (private)	99	87	-12
Stafford 3B5P (private)	93	86	-7

* The Lumley includes a home office of 7.35m² which is below the minimum single bedroom size, hence its planning designation. In this instance, the minimum size for a 4B6P three-storey house would be 112m².

** The Moseley is designated as a 2B4P three-storey home, which does not conform to any minimum standards, principally because the staircase consumes a disproportionately large proportion of the floor area, negatively affecting the usable space.

Additionally, the London Housing Guide is routinely referred to for housing design and this document states “Dwellings with three or more bedrooms should have two living spaces, for example a living room and a [separate] kitchen-dining room.....Studies will not be considered as second living spaces.”

Parking Standards:

Please would the LA also confirm the rationale behind supporting a scheme which includes some private garages which measure 2.55m x 4.90m. It is widely accepted by LA's across the country that a single garage should measure at least 3.0m x 6.0m. Assuming that these garages form part of the overall proposed parking strategy for the site, then the Council's DM13 policy on cycles and parking has not been complied with?

Sustainable construction:

Brownfield sites are often awkward and compromises have to be made in these circumstances; the benefits are clear in these instances as there is community benefit in developing previously built-on sites in preference to greenfield sites. The site to the rear of Castle Avenue is a greenfield site, capable of supporting a finite level of development in terms of density and the developer should bring forward a sustainable, deliverable scheme; on greenfield sites, there are no excuses for deviating from sustainable development whether that is sustainability in terms of construction, energy, water, drainage or human wellbeing.

Yours faithfully

Daniel and Sally Stroud