DETAILS OF YOUR COMMENT

Part B

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	HD13	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	◉ Yes	○ No
(b) is sound?	○ Yes	◉ No
(c) complies with the duty to co-operate?	◉ Yes	○ No

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

(a) positively prepared?	✔	(c) effective?	✔
(b) justified?	✔	(d) consistent with national policy?	✔

Q4. Please tell us below why you consider the document to be unsound, not legally compliant or fails to comply with the duty to co-operate. If you do believe the document is sound, legally compliant, or complies with the duty to co-operate you may use the box to explain why.

Policy Hd13 criterion C has a misplaced requirement in relation to garden size.

criterion c allows for a 3 bed flat to have a garden/amenity space of a minimum of 4.5sqm. this is deemed appropriate.

however the same sized dwelling (whatever size that is) if it is a bungalow or other form of single storey home but not a flat requires a garden/amenity space the same size as the floorspace. thus a 60sqm bungalow (GEA) requires a garden amenity area some 13x larger than if the accommodation were a flat. A 90sqm bungalow would require an amenity space of up to 20x the space of an equivalent sized flat. This enormous and unjustified disparity is made all the more clear when one also then considers what the garden amenity space for a three storey 90sqm

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) It would be helpful if you could suggest revised wording for the policy or text in question.

policy HD13 criterion c makes perfect sense and would not seek to impose an unnecessarily and illogically arbitrary garden size it it were reworded to omit the words 'which will be at least equivalent in size to the footprint of the dwelling as built originally' from the end of the first sentence.

this would achieve soundness and good sense which is what planning should be about. it also allows for better use of land, as flexible solutions can be found without having to adhere to arbitrary and nonsensical size criteria.

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This is the end of the comment form