

The Programme Officer  
Development Management Plan Examination  
Planning Department  
Hastings Borough Council  
Aquila House, Breeds Place  
HASTINGS  
East Sussex  
TN34 3UY

Our Ref: TCPS 568  
25<sup>th</sup> November 2014

Dear Lynette,

**Hastings Development Management Plan Examination  
Draft Policy DM 3(f) – General Amenity  
Matter 2/Issue 2.3  
Examination Hearing Date 19<sup>th</sup> November 2014**

During the Hearing Session on 19<sup>th</sup> November 2014 in relation to draft Policy DM3, the Examination Inspector asked that The Park Lane Group suggest wording changes to the relevant part of the Development Management Plan. It must be stressed that it is The Park Lane Group's case that there is no justification for introducing minimum internal floor space standards, as these would damage the prospect for the future delivery of new house building within the Town as discussed at the Hearing. As mentioned by Mr Beswick at the hearing Building Regulations already provide for disabled circulation space requirements within residential dwellings.

It is also The Park Lane Group's case that although there is a minimum standard for rear garden size in the currently adopted Local Plan (Policy DG11), the Council is likely to continue to strictly enforce such measures even though it is expressed as a guideline in draft Policy DM3.

The Park Lane Group's case is that both the minimum floor space standards and garden size standards should be deleted from the Plan altogether but if, on a without prejudice basis, the Inspector does not accept this, the guidelines should only be inserted into the lower case supporting policy text and not within the policy itself. It is on that basis that the attached wording changes are put forward.

The internal floor space figures for the two bed/3 person and 3 bed/4 person units reflect the size of new houses currently being built by The Park Lane Group

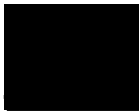
in the Town. The other minimum floor space standards (which differ from those in the published version of the draft Policy) are based upon sizes of homes that The Park Lane Group have built and consider to be viable within the Town based upon its extensive local knowledge and building experience.

There were two other matters raised at the Hearing, which The Park Lane Group would like to clarify for the avoidance of any doubt;

- i. The Park Lane Group wish to confirm that the figures used in the comparison appraisals for its High Breezes development (appendix 6 of the Representations) were based on the original cost and values used in the appraisal as submitted at the time of the original planning application for 79 dwellings in 2013. The appraisal was submitted as part of that planning application to demonstrate that if the Council's policy on affordable housing were to be applied, then the site would not be economically viable to develop. To ensure a direct like for like comparison between the approved scheme and the reduced 62 unit scheme (page 50 of appendix 5 of the Representations) using the Council's proposed minimum floor space standards in draft Policy DM3, the sales values per dwelling and construction costs per sq m as well as the site 'abnormal costs' were left at the 2012 levels contained within the original appraisal agreed at the planning application stage. This method of comparing the two schemes concludes that had the Council's proposed minimum floor space standards areas been imposed at that time, the site would not have been viable for development at all resulting in 79 units being lost from the Council's proposed housing supply.
- ii. Whilst the Council asked the Inspector to view The Park Lane Group's Hawthorn Road development schemes as Mr Beswick pointed out at the Hearing, these are not representative of The Park Lane Group's current development in the Town, as the development relates to an historical scheme dating back to 1979 and is of a design of that time.

I would be grateful therefore, if you could forward this correspondence and the attachment to the Examination Inspector.

Yours sincerely,



**Mike Pickup MRTPI**  
**Enc.**