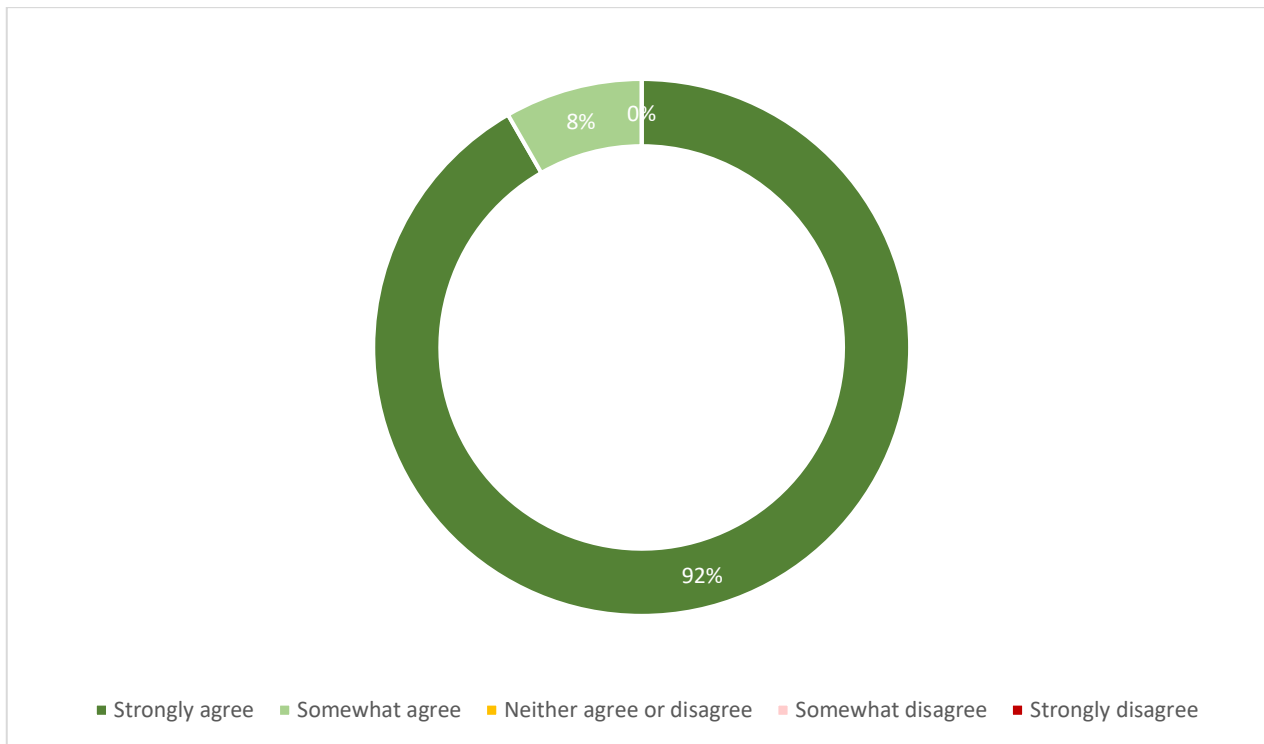


Residential space standards: post consultation report

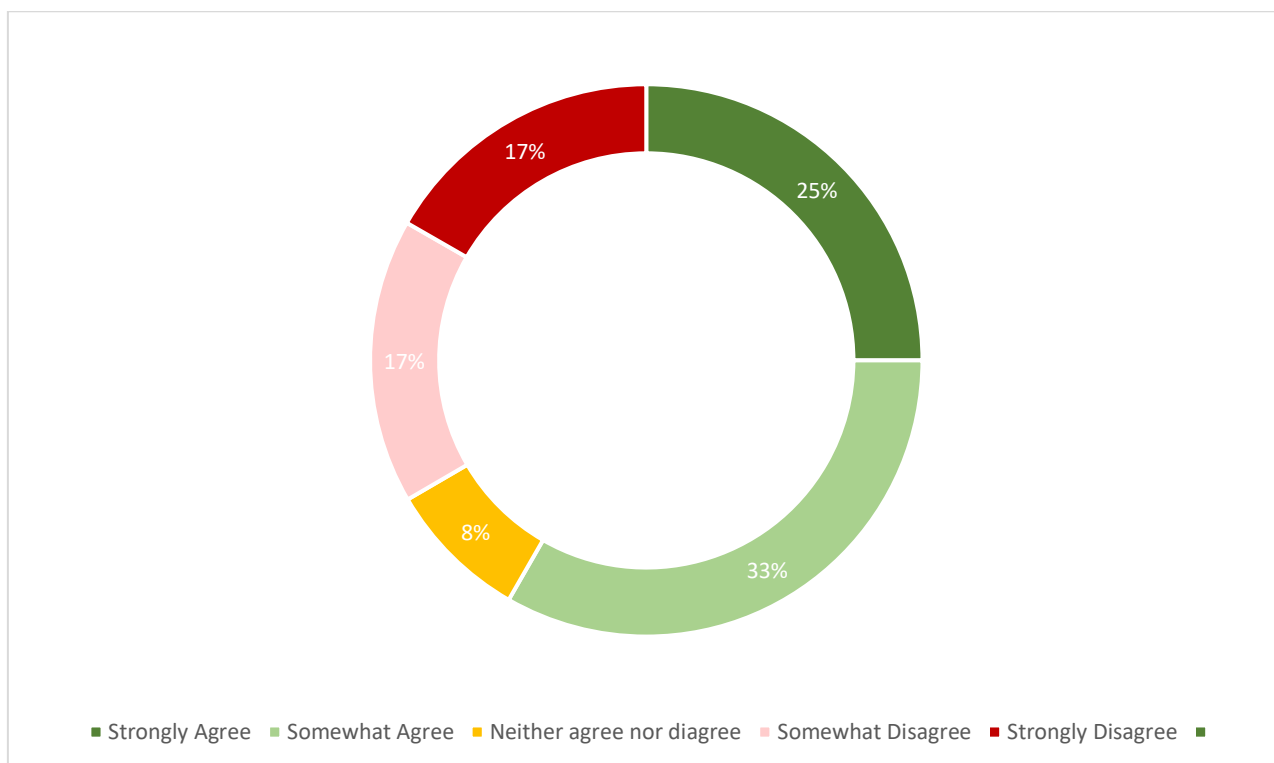
Appendix 2: consultation feedback and response

1. Jersey's residential space standards were last reviewed, in part, in 2009. They haven't been reviewed comprehensively since 1994. Please state whether you agree or disagree with the need to review residential space standards?



Consultation feedback	Response
The Standards act as a benchmark but only as confirmation as to the minimum space that a developer needs to provide. It is unrealistic to expect that by providing the Standards that the minimum will be exceeded.	The guidance makes clear that these standards should be regarded as a minimum, and not a benchmark or upper limit to maximise density or yield. It is best practice to exceed them. Quality of homes can also be enhanced by great design as well as size and developers can use this guidance to create the best outcome.
The intention of setting these Standards is sound, but improving the size/quality of the product is limited as the incentive by developers for going above the minimum is unrealistic given the reality of the market conditions, cost of construction and competing developers for a captive market.	See above.
If the intent of providing new Standards is to improve the standard of accommodation, the new Standards fall short of achieving that, from a developers perspective the minimum is unlikely to be exceeded, as it is benchmarked against its competitors and the market.	See above.

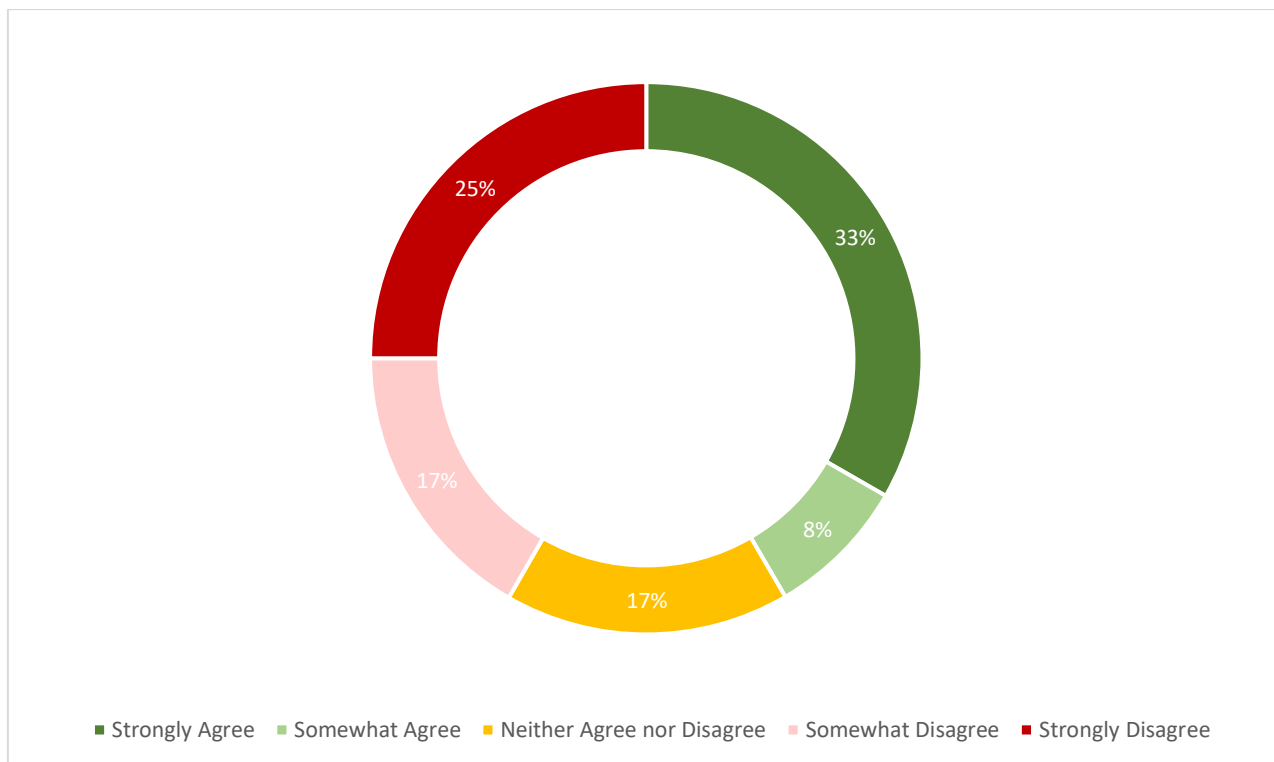
2. Residential space standards have been set based on the maximum number of people who might occupy a home. This is based on the number and size of bedrooms and their potential occupancy (i.e. by one or two people). Please state whether you agree or disagree with the use of this approach to set residential space standards?



Consultation feedback	Response
Base the size on modern size people!	<p>As well as meeting the provision of space, the guidance requires that internal living space should be easy to use with layouts that are adaptable to facilitate the flexible use of space.</p> <p>It seeks to ensure that every home should be flexible enough to accommodate a range of possible changes in circumstances, and to reflect peoples’ differing needs.</p>
The planning approval system appears to assume families will only ever have one, max two, children and should live in a small flat with minimal amenity space, no car in the household and Millennium park as outdoor space.	<p>The bridging Island Plan Policy H4 – Meeting housing needs states that in order to ensure the creation of sustainable, balanced communities, the development of new homes will be supported where it can be demonstrated that it positively contributes to meeting identified housing needs of the local community or the island, in terms of housing types, size and tenure, having regard to the latest evidence of need.</p> <p>The space standards seek to provide options for numerous sizes of households and homes. The standards are based on the number of occupants that a dwelling is designed to accommodate, including larger families.</p> <p>Household size in Jersey has been declining over the last five decades meaning that fewer people live together as a household: the average household size in 2021 was 2.27. In</p>

Consultation feedback	Response
	<p>addition, 26.4% of households were 'under-occupied' in Jersey on census night 2021.</p> <p>These trends mean that the island community has a greater need for smaller homes, simply as a consequence of demographic change.</p>
<p>2 bed home could be occupied by 4 people, but the space is insufficient, especially for children, that need space.</p>	<p>The space standards set out the gross internal floor area of homes which allows for the minimum amount of space to be provided for living room, dining room and kitchen space; and bedrooms, based on its potential occupancy. The level of potential occupancy is determined by the number and size of bedspaces provided.</p> <p>The guidance specifically acknowledges the needs of children in family homes.</p> <p>The revised space standards have been increased and exceed those adopted in London and nationally in the UK.</p>
<p>The bedrooms are often so small that a one bed apartment can really only accommodate a single person and a two bedroom apartment cannot accommodate 4 people comfortably and is certainly not suitable for a family comprising parents and two young kids.</p>	<p>See above.</p>
<p>The correlation between occupancy and size of unit is inconsistent, such that 2 people are prescribed 52m² therefore 4 people should need 104m², thereby determining that 2 people need more room than 4? The living space should increase proportionately with the number of people occupying a dwelling, the bedrooms should stay consistent.</p>	<p>The space standards set out the gross internal floor area of homes which allows for the minimum amount of space to be provided for living room, dining room and kitchen space; and bedrooms, based on its potential occupancy.</p> <p>The level of potential occupancy is determined by the number and size of bedspaces provided.</p> <p>The space also includes allowances for other elements, such as circulation space and services, which do not necessarily generate additional space requirements in direct proportion to the number of people who might potentially occupy a home. This is, however, affected by the number of storeys within a home, which is why the space standard differs for accommodation with more than one storey, but where the same number of people might be accommodated.</p>
<p>It sounds like a good approach, but in practice it has clearly been failing as properties are ludicrously small and totally unfit for family life.</p>	<p>Revision of the guidance and its re-issue, together with the requirement to provide more easily accessible and clear information about space standards as an integral part of planning applications helps to enable a more consistent approach to the assessment of development proposals, at both a pre-application and planning application stage, and to ensure that standards are being applied and met.</p>

3. The minimum standards set the overall level of floorspace to be provided for different sizes of homes, based on their potential level of occupancy. Please state whether you agree or disagree with the proposed standards of gross internal area set out in table 1.



Consultation feedback	Response
Set minimum standards that make developers build large flats, if you're going to keep building them. Don't set a standard you wouldn't tolerate for your own family.	The standards are based on the number of occupants that a dwelling is designed to accommodate. Consideration is also given to the number of storeys of accommodation to be provided and are applicable to both houses and flats.
Occupancy should be determined by the number of bedrooms and thus potential, not actual; occupants	See above.
Yes. Minimum room sizes do need to be reviewed, but perhaps these standards should vary depending on the kind of dwelling.	See above.
Size is too small to fit in a decent sized bedroom set with dressing table in bedrooms. Living areas are too small for sofas and dining area.	The standards are based on a study of room sizes relative to designed occupancy levels. Each type of room was planned around the furniture and activity and access requirements. The GIA is the cumulative total of room areas plus an allowance for circulation and partitions. These revised standards deliver improvements on existing space standards and generally exceed minimum standards in the UK.
A two bedroom is not the sufficient size for two people to comfortably live and work at home. We spend more time at home than before the pandemic and as such the size should accommodate it.	The minimum space standards seek to create good quality residential accommodation that is responsive to the changing ways we live and work. The standards have recognised the

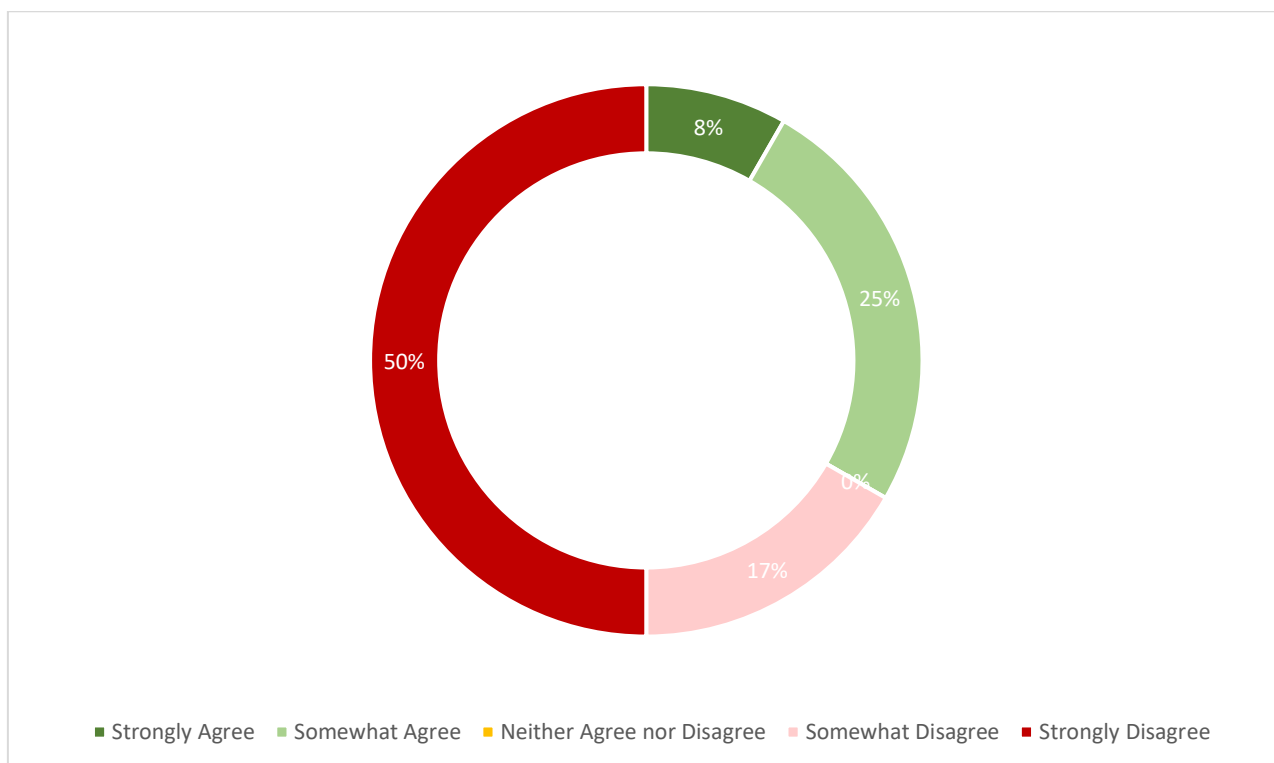
Consultation feedback	Response
	<p>trend of hybrid and remote working and encourage better provision for home working.</p> <p>Revision of the guidance and its re-issue, together with the requirement to provide more easily accessible and clear information about space standards as an integral part of planning applications helps to enable a more consistent approach to the assessment of development proposals, at both a pre-application and planning application stage and to ensure that standards are being applied and met.</p> <p>These revised standards deliver improvements on existing space standards and generally exceed minimum standards in the UK.</p> <p>Once adopted, the application, use and effectiveness of the standards will be kept under review.</p>
<p>The way in which people live and work has changed, particularly following the lockdowns and introduction of hybrid and remote working. Homes are no longer just a place to sleep. In particular, when you consider that many new homes being built have a shared kitchen / dining / living space and little storage, this approach (ie a 1-bed flat is suitable for 2 people) is no longer suitable.</p>	<p>See above.</p>
<p>Both open space living rooms and bedrooms are too compact</p>	<p>See above.</p>
<p>Not adequate. Should be more.</p>	<p>See above.</p>
<p>Too small</p>	<p>See above.</p>
<p>Current three / four bed houses are adequate, but one and two bed flats need to be increased in size. Ideally these should be raised by circa 20%, and thus are likely to encourage houses rather than flats - the Island is short of housing, but has plenty of flats.</p>	<p>The standards for one- and two-bed flats have been increased and exceed those adopted in London and nationally in the UK.</p> <p>Household size in Jersey has been declining over the last five decades meaning that fewer people live together as a household: the average household size in 2021 was 2.27.</p> <p>These trends mean that the island community has a greater need for smaller homes, simply as a consequence of demographic change.</p>
<p>Bedrooms in 1/2 bed flats are small, with little / no storage; need increasing considerably.</p>	<p>See above.</p>
<p>What is the reason for the minimum size for a three bedroom, five person home being increased by 0.5m², from 96.5m² to 97m²? Is there any science behind this?</p>	<p>Housing standards have been used to ensure the provision of adequate space and amenity in our homes for some time. The new standards and guidance are intended to encourage provision of enough space in dwellings to ensure homes can be used flexibly and are more responsive and resilient to changes in the way we now live.</p> <p>The changes proposed in the Jersey standards reflects best practice elsewhere and ensures that they are founded on tried and tested good practice principles.</p>

Consultation feedback	Response																												
	The London Plan Housing Design Standards (June 2023) sets minimum and best practice internal space standards for a 3b5p two-storey home at 93 sqm (min) and 104 sqm (best practice).																												
<p>The London Housing Design Guide cites that a 3B/5P home should be a minimum of 96m². In an Island with pressure on space, why is it that the minimum standard for London is not adequate for us?</p>	<p>The adopted London Plan Housing Design Standards (June 2023) sets minimum and best practice internal space standards (in sqm). The best practice space standard provides additional space, over and above the minimum space standard, to ensure new homes are fit for purpose and of the highest residential quality. They specifically require more storage and better provision for home working.</p> <table border="1" data-bbox="815 692 1398 891"> <thead> <tr> <th data-bbox="815 692 922 741">3b5p</th> <th colspan="2" data-bbox="922 692 1082 741">1-storey</th> <th colspan="2" data-bbox="1082 692 1241 741">2-storey</th> <th colspan="2" data-bbox="1241 692 1398 741">3-storey</th> </tr> <tr> <th data-bbox="815 741 922 790">(sqm)</th> <th data-bbox="922 741 1002 790">Min</th> <th data-bbox="1002 741 1082 790">Best</th> <th data-bbox="1082 741 1161 790">Min</th> <th data-bbox="1161 741 1241 790">Best</th> <th data-bbox="1241 741 1321 790">Min</th> <th data-bbox="1321 741 1398 790">Best</th> </tr> </thead> <tbody> <tr> <td data-bbox="815 790 922 840">London</td> <td data-bbox="922 790 1002 840">86</td> <td data-bbox="1002 790 1082 840">97</td> <td data-bbox="1082 790 1161 840">93</td> <td data-bbox="1161 790 1241 840">104</td> <td data-bbox="1241 790 1321 840">99</td> <td data-bbox="1321 790 1398 840">110</td> </tr> <tr> <td data-bbox="815 840 922 891">Jersey</td> <td colspan="2" data-bbox="922 840 1082 891">88</td> <td colspan="2" data-bbox="1082 840 1241 891">97</td> <td colspan="2" data-bbox="1241 840 1398 891">106</td> </tr> </tbody> </table> <p>It is evident that the proposed Jersey standards sit comfortably within the range of standards adopted in London: they are considered neither inadequate or excessive.</p>	3b5p	1-storey		2-storey		3-storey		(sqm)	Min	Best	Min	Best	Min	Best	London	86	97	93	104	99	110	Jersey	88		97		106	
3b5p	1-storey		2-storey		3-storey																								
(sqm)	Min	Best	Min	Best	Min	Best																							
London	86	97	93	104	99	110																							
Jersey	88		97		106																								
<p>Making the same point, the document entitled “UK Technical Housing Standards - nationally described space standard” March 2015, a 3B/5P home is required to be a minimum of 93m².</p> <p>Under a revision in May, 2016, this overall GIA includes an area of 2.5m² for built in storage – so the minimum GIA is 93m².</p>	The UK nationally described space standard was developed pre-pandemic and does not, therefore, recognise or make specific provision for additional space to support home working.																												
<p>The relevant increase in minimum requirements for Living, Dining and Kitchen (LDK) space is welcome, I feel that the 1 bedroom 2-person (1b2p) apartments are losing out by comparison in the current SPG. The current SPG did not specify a minimum LDK, however once you removed the minimum provision of the bedroom, bathroom and storage from the 51m²Gross internal area (GIA), the applicant would be left with 32.1m² of internal area to meet minimum standard. It is therefore safe to assume that the applicant would easily reach the 24.6m² currently set out for LDK, therefore meaning a 1b2p apartment could potentially lose 0.6m² in liveable space in the new SPG when compared to the current.</p> <p>Recommendation 2 – Increase the minimum size for 1b2p LDK to 25m² thereby providing an increase in liveable space.</p> <p>1b2p apartments do not improve in terms of liveable space with the gain in GIA, only the minimum increase in storage from 2m² to 3m² increases GIA. This could lead to applicants using the spare 8.1m² as corridors or transitional spaces, as well as internal walls, to make up</p>	<p>Change</p> <p>The GIA standard for the 1b2p home is increased under the proposed revised guidance from 51 to 52 sqm, which exceeds the UK standard of 50 sqm.</p> <p>Storage for this form of accommodation is proposed to increase from 2.0-3.0 sqm.</p> <p>The current guidance does not specify a minimum standard for living, dining and kitchen areas (the standard stipulates that a minimum area of 13 sqm is provide for kitchen/diners for 1-/2- and 3-persons homes).</p> <p>Specification of an area for minimum LDK, and more consistent application and use of this revised guidance, should ensure that this improved standard is applied and met.</p> <p>In addition, the guidance is to be revised to make clear that space for LDK should not include space immediately inside the front door, or any circulation space needed to access other rooms.</p>																												

Consultation feedback	Response
to the required GIA rather than providing an adaptable increase in living space.	
<p>The other item I was concerned with is again the addition of Utility, plant, etc.</p> <p>Given all your new requirements under the bridging Island Plan for 20% Energy, you have to fit Solar PV or Wind, these all require Invertors units, Energy Tanks, Larger cylinders, etc to accommodate, so this has to be covered in the minimum area requirements given it is your additional requirements not the owners/building inspectors requirements</p>	<p>Built-in storage areas are included within the overall minimum GIA and include a minimum allowance of 0.5 sqm for fixed services or equipment such as a hot water cylinder, boiler or heat exchanger. If further space is required to accommodate other services, the GIA should be increased to accommodate them.</p>
<p><i>Objective Determination of occupancy by room size.</i></p> <p>At present, many planning applications propose units as "2 bedroom 3 person", which would have a minimum GIA of 63m². This is done despite the two bedrooms qualifying as two double bedrooms under the existing standards. Any guidance that allows for the concept of both 2b3p and 2b4p rooms needs a quantitative way of defining the occupancy that is not down the applicants' subjective choice. Using the room size of the secondary room should determine the occupancy.</p> <p>There is a risk in applying this rule that applicants do not use the 2 bedroom 4 person standard, so guidance for housing mix and minimum standards should also reference the need for both 2b3p and 2b4p units in developments and not support an over-concentration of 2b3p.</p> <p>There is also a risk that rooms below the minimum standard of a single bedroom (8m²) are proposed as studies and circumvent the intended minimum standard for a two bedroom. For example, a 1 bedroom 2 person unit would have a GIA of 52m². The addition of a study at 7m² would not be considered a bedroom under 4.1.1 and therefore could allow for a unit at 59m² to have to two "bedrooms".</p> <p>Recommendation 3: Units with a second bedroom greater than a given size (possibly 11.5m²) are considered four-person occupancy and must meet those standards.</p> <p>Recommendation 4: The SPG should provide context on unit mix and guidance against over-concentration of two bedroom three person units without two bedroom four person units.</p> <p>Recommendation 5: Further consideration is given to how units with rooms below the minimum for a bedroom are permitted or not.</p>	<p>The space standards set out the gross internal floor area of homes which allows for the minimum amount of space to be provided for living room, dining room and kitchen space; and bedrooms, based on its potential occupancy. The level of potential occupancy is determined by the number and size of bedspaces provided and, therefore, any home with two double bedrooms is already treated as having a potential occupancy of four people, under the terms of this guidance.</p> <p>This guidance is about space standards. Bridging Island Plan Policy H4 – Meeting housing needs deals with housing mix. This is, in itself, a material consideration in planning decisions.</p> <p>The planning system can regulate the size of homes but cannot regulate the number of people who might occupy residential accommodation. It can seek to ensure that homes are appropriately designed to ensure that they are capable of providing good quality accommodation for the number of people that the home is designed to accommodate, relative to bedspace and its size. Any room that is provided that is below 8 sqm is not deemed to be sufficient to provide an adequate bedspace and would not, therefore, in planning terms, be construed as providing one.</p>
<p>Homes that meet minimum standards but are poorly designed, can cause problems too.</p> <p>'Bigger' doesn't necessarily mean better, but it always means less affordable.</p>	<p>Jersey needs more homes, but these need to be well designed, sustainable dwellings. The standards aim to ensure that development proposals create well-designed and sustainable places that are of high quality.</p>


Consultation feedback	Response
Remove reference to it being 'best practice' to exceed minimum standards, as it is encouraging homes that become increasingly unaffordable.	The minimum standards aim to ensure that development proposals create well-designed and sustainable places that are of high quality. It will be a matter for the developer, in terms of providing choice relative to the demand, to determine whether the minimum standards are exceeded.
The penultimate paragraph of section 4.1.1 should be reworded to encourage innovative, flexible, multi-purpose rooms and design approaches.	The guidance does not preclude flexible and innovative design approaches, or the flexible use of space. It seeks to ensure that the basic components of space are provided and of a size that is proportionate to the level of potential occupancy.
For meaningful consultation purposes there should be overall space comparisons with current standards. It would then be possible to evaluate the economic impacts of the proposed new standards.	<p>A comparison of existing and proposed standards was set out as part of the consultation (see: Draft supplementary planning guidance: residential space standards (gov.je)) and included the following tables.</p> <p>Table 1: Minimum gross internal area (GIA) sq m</p> <p>Table 1A: Minimum gross internal area (GIA) sq m comparison Jersey/UK</p> <p>Table 2: Minimum combined floor area of living, dining and kitchen spaces (sq m)</p> <p>Table 3: Minimum floor areas of bedroom spaces (sq m)</p> <p>Table 4: Minimum storage spaces (sq m)</p> <p>Table 5: Minimum private amenity space: flats (sq m)</p> <p>Table 6: Minimum private amenity space: houses (sq m)</p>

4. The standards set the minimum level of floorspace to be provided for the combined area of living room, dining room and kitchen. Please state whether you agree or disagree with the proposed standards for the combined area of living room, dining room and kitchen space set out in table 2.



Consultation feedback	Response
These spaces are not large enough to fit a sofa and dining space let alone anything else that may be required.	The standards are based on a study of room sizes relative to designed occupancy levels. Each type of room was planned around the furniture and activity and access requirements. These revised standards deliver improvements on existing space standards and generally exceed minimum standards in the UK.
Again these need increasing for 1/2 bed units, which generally have combined living and dining (and kitchen) space. As such these areas need to be substantially increased.	See above.
Not adequate. Should be more.	See above.
Important to have sufficient open plan space. And storage!	See above. Storage is addressed in question 5.
The living space needs to increase in conjunction with the functions for that space and number of occupancy, and should not be combined into one number. for example an apartment for 4 people, must be able to accommodate a kitchen that is sufficient for 4 people, space	Change The combined area of the living room, dining room and kitchen is a long-established and important measure of the quality of space within a home. The minimum combined living areas in this guidance allow the designer the freedom to organise and combine

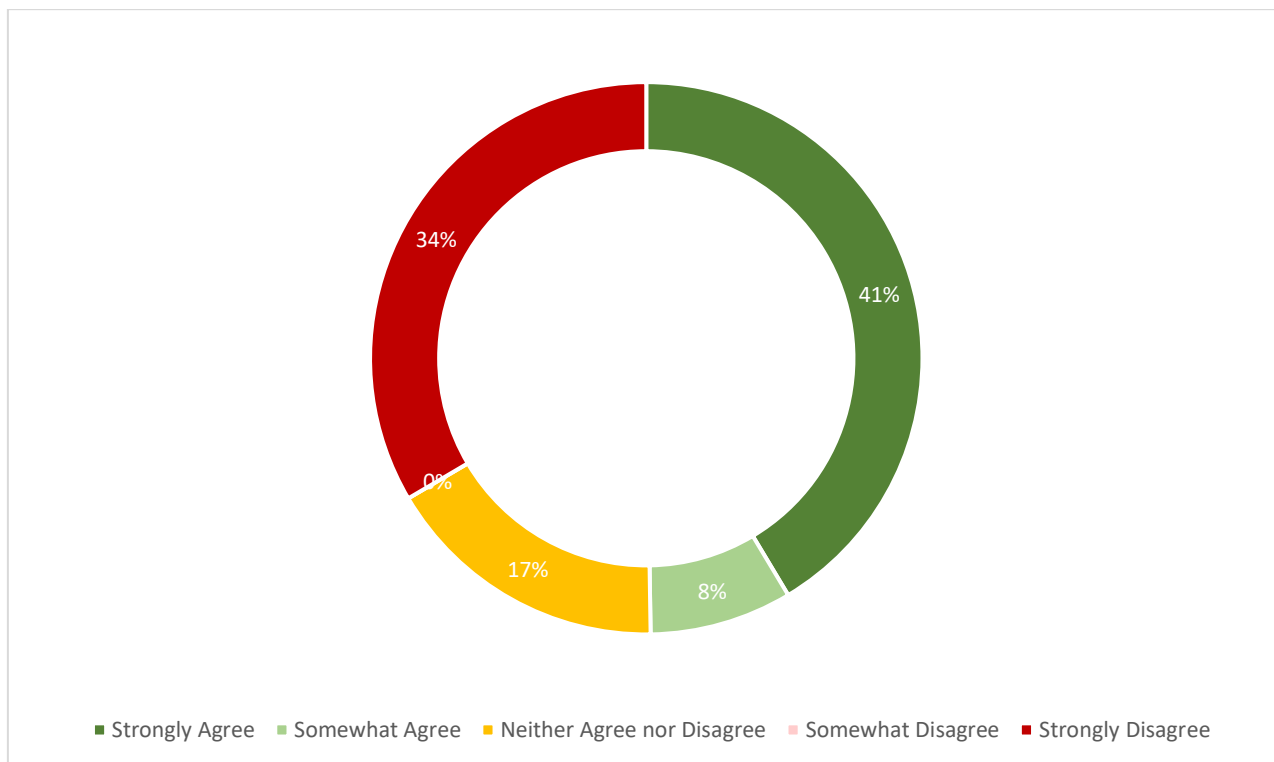
Consultation feedback	Response
<p>for a dining table for 4 people, living space for 4 people, and so on.</p> <p>The Standards currently do not meet this requirement and the minimum area should exclude circulation space.</p>	<p>these spaces in different ways relative to the number of potential occupants.</p> <p>An open-plan layout of living, dining and kitchen spaces is often considered to be the market preference, but there are times when it is preferable to achieve a degree of separation, at least between the living space and the work area of the kitchen.</p> <p>The guidance makes clear that homes for larger families should cater for activities involving any number of members of the family, with or without guests. Dwellings with three or more bedrooms should have two social spaces, for example a living room and a kitchen-dining room – both with external windows.</p> <p>It is also proposed that the guidance is amended to note that in open-plan layouts, the living room, dining room and kitchen floor area measured should be clearly identified and that it should not include the space immediately inside the front door, or any circulation space needed to access other rooms.</p>
<p>The minimum combined living, dining and kitchen spaces standard is too dictatorial, the market leads to modern living standards enjoying open plan living.</p>	<p>See above.</p>
<p>Too small for 3 functional areas.</p>	<p>See above.</p>
<p>The requirement that dwellings with three or more bedrooms to have two social spaces is not considered necessary and may dissuade developers from delivering larger homes.</p>	<p>Homes for larger families must cater for activities involving any number of members of the family, with or without guests.</p> <p>Conversely, where two spaces are provided from the start, it should also be possible to remove the dividing wall without significant structural implications, to provide flexible use.</p>
<p>Section 4.1.2 should include reference to the designed occupancy standard for a 1-person home.</p>	<p>Change</p> <p>Single person occupancy standards are set out in section 5.2 of the draft guidance. These are to be embedded in the tables throughout the revised guidance.</p>
<p><i>Measurement of Room Sizes</i></p> <p>With a greater focus on the minimum room sizes, in particular that for living-kitchen-dining rooms, I think it is essential guidance is given on how the area of these rooms are measured. Many units propose that doors to bedrooms and bathrooms are directly off the LKD, and/or contain 'corridor-esque' area that should not count toward the minimum room size. As such clear guidance on the measurement of what is part of the "room" is needed to avoid entrance corridors counting towards the space.</p> <p>Examples in which it should be considered what counts (highlighted yellow is proposed as outside the LKD minimum, highlighted amber is ambiguous) (graphics attached to response)</p>	<p>Change</p> <p>Guidance to be amended to note that in open-plan layouts, the living room, dining room and kitchen floor area measured should be clearly identified. It should not include the space immediately inside the front door, or any circulation space needed to access other rooms.</p>

Consultation feedback	Response
<p data-bbox="204 322 826 412">Recommendation 6: Clear guidance is given on how Living-Kitchen-Dining rooms floorspace is measured, and what is excluded from the measurement.</p> 	

Consultation feedback	Response																																																	
<p>Current SPG states, in Section 7 paragraph 1, "It is important to emphasise that these are the absolute minimum standards and in most instances the Planning and Environment Department would expect to see more generous provision". Most developers will aim for the minimum, rather than provide generously.</p> <p>I believe that this new SPG should be more direct and set out a requirement for a minimum liveable space within a minimum GIA. A liveable space should be defined as an area that the occupant can use freely and for their own choice. This area should not include transitional pathway or corridors, to access other rooms, or unusable spaces, i.e. door swings. By requiring the addition of 10% to the total area of bedroom(s) and LDK, the applicant can decide where they wish to add this extra space however it will always be to the benefit of the occupant. The below table gives an indication of my thoughts around the better use of liveable space, while highlighting the available remaining space that can be utilised to form corridors and door swings, compared with GIA.</p> <table border="1" data-bbox="213 927 826 1077"> <thead> <tr> <th>Table 1</th> <th>4B6P</th> <th>3B5P</th> <th>2B4P</th> <th>2B3P</th> <th>1B2P</th> <th>1B1P</th> </tr> </thead> <tbody> <tr> <td>Current Total MLS*</td> <td>79.5</td> <td>65</td> <td>54</td> <td>47.5</td> <td>36.5</td> <td>33.53</td> </tr> <tr> <td>MLS increased by 10%</td> <td>87.45</td> <td>71.50</td> <td>59.40</td> <td>52.25</td> <td>40.15</td> <td>36.88</td> </tr> <tr> <td>Internal Storage - Proposed</td> <td>6</td> <td>5</td> <td>4</td> <td>3</td> <td>3</td> <td>2</td> </tr> <tr> <td>Bathroom</td> <td>4.4</td> <td>4.4</td> <td>4.4</td> <td>4.4</td> <td>4.4</td> <td>4.4</td> </tr> <tr> <td>GIA</td> <td>102</td> <td>88</td> <td>77</td> <td>63</td> <td>52</td> <td>40</td> </tr> <tr> <td>Spare GIA for Corridors</td> <td>4.15</td> <td>7.10</td> <td>9.20</td> <td>3.35</td> <td>4.45</td> <td>-3.28</td> </tr> </tbody> </table> <p>*MLS = Minimum Liveable Space is total area of bedroom(s) and LDK</p> <p>Recommendation 3 – Take the sum of all the minimum habitable rooms and add 10% to create a minimum liveable space requirement as well as a minimum GIA.</p> <p>Recommendation 4 – Define corridors and passageways, in accordance with Part 8 of Policy, guidance, laws and regulations (planning and building), and note that these areas cannot be utilised with the minimum liveable space.</p> <p>Recommendation 5 – Corridors and passageways should be clearly indicated on drawing and plans. There is an appreciation that some units may not meet the minimum standard, in terms of GIA or liveable space because of efforts to meet minimum density, however these must be in the extreme minority, clearly presented to the department on application and justified. I would add to this SPG a requirement to present drawings that clearly show the measurements used to calculate areas.</p> <p>Recommendation 6 – Clear guidance on how liveable space is to be measured and these measurements should be clear on drawings.</p> <p>Recommendation 7 – Units not meeting the minimum requirements should be required to be clearly indicated and presented with justification.</p>	Table 1	4B6P	3B5P	2B4P	2B3P	1B2P	1B1P	Current Total MLS*	79.5	65	54	47.5	36.5	33.53	MLS increased by 10%	87.45	71.50	59.40	52.25	40.15	36.88	Internal Storage - Proposed	6	5	4	3	3	2	Bathroom	4.4	4.4	4.4	4.4	4.4	4.4	GIA	102	88	77	63	52	40	Spare GIA for Corridors	4.15	7.10	9.20	3.35	4.45	-3.28	<p>The new standards and guidance are intended to encourage provision of enough space in dwellings to ensure homes can be flexibly used by a range of residents. They also aim to ensure that space can be sensibly allocated to different functions, with adequate room sizes and storage integrated into their planning</p> <p>The combined area of the living room, dining room and kitchen is a long-established and important measure of the quality of space within a home. The minimum combined living areas in this guidance allow the designer the freedom to organise and combine these spaces in different ways while safeguarding the overall living space within a dwelling.</p> <p>Similarly, setting minimum standards for bedspace, relative to occupancy, is a long-established, widely accepted and important measure.</p> <p>Storage is also a critical component of a house, and ensuring adequate provision is considered to be essential.</p> <p>The requirement to set out a detailed schedule of provision (relative to adopted guidance) as set out at appendix 2 of the guidance, should promote consistency of use and application.</p> <p>The guidance is to be amended to note that in open-plan layouts, the living room, dining room and kitchen floor area measured should be clearly identified. It should not include the space immediately inside the front door, or any circulation space needed to access other rooms.</p> <p>The guidance already makes clear that there will be some limited circumstances where the blanket application of planning standards may be counter-productive in achieving the best design solution, or outcome for the existing and future community. Any variation from the adopted residential space standards will require justification but a flexible application of this guidance will be adopted where it can be demonstrated that:</p> <ul style="list-style-type: none"> • there are particular physical constraints of a site or a building which prevent the standards being met, and which otherwise can't be addressed by reducing development density and yield, or through suitable design alterations; • there are other overriding planning considerations, such as managing and/or limiting the impact on protected listed buildings; • in very limited circumstances and where there is exceptional justification, smaller homes are required to be provided in order to meet a proven housing need, 3 which might include residential
Table 1	4B6P	3B5P	2B4P	2B3P	1B2P	1B1P																																												
Current Total MLS*	79.5	65	54	47.5	36.5	33.53																																												
MLS increased by 10%	87.45	71.50	59.40	52.25	40.15	36.88																																												
Internal Storage - Proposed	6	5	4	3	3	2																																												
Bathroom	4.4	4.4	4.4	4.4	4.4	4.4																																												
GIA	102	88	77	63	52	40																																												
Spare GIA for Corridors	4.15	7.10	9.20	3.35	4.45	-3.28																																												

Consultation feedback	Response
	<p>accommodation designed for short-term occupancy or shared use.</p> <p>Where any homes are proposed to be provided for short-term occupation there will also be a need to demonstrate that their use and occupancy can be effectively regulated to prevent medium- or long-term occupancy.</p> <p>In all cases, any deviation away from adopted residential space standards will need to demonstrate that this would not be detrimental to the health and wellbeing of intended occupants or users of the development and the quality of place.</p>
<p>'Desirable' Room Sizes Section 4 paragraph 6 references "Although it is best practice to meet the desirable standards for room areas and dimensions...". This is the only reference of "desirability" in the document. Are these different dimensions or sizes to the minimum standards, and if so, where are they detailed? The previous SPG was more detailed on room dimensions. Does this SPG need to contain these figures to make this sentence make sense?</p>	<p>Change</p> <p>This will be reworded to promote clarity that it is minimum (rather than desirable) standards that should be met.</p>

5. The standards set the minimum level of storage space that should be provided in each home, relative to its potential level of maximum occupancy. Please state whether you agree or disagree with the proposed standards for the provision of storage space set out in table 4.



Consultation feedback	Response
Residential spaces being built currently are hugely dominated by 1-bedroom flats. Furthermore, these are essentially 3 rooms (bedroom, bathroom and kitchen/living space) with storage advertised as a "bonus". This is unsustainable. Firstly, the lack of storage means these spaces are barely big enough to house couples.	The provision of storage space is recognised as a key part of residential accommodation and is the subject of a specific set of standards in the guidance. As a consequence, the need to provide adequate storage space will be material to planning decisions. These revised standards generally deliver improvements on existing space standards, particularly for flats, and exceed minimum standards in the UK. They also reflect or exceed best practice standards in the London Plan Guidance: Housing Space Standards (July 2023).
Provision of storage space is never going to be considered by developers whilst they are allowed to not provide any.	See above.
Storage space needs to come as standard and not be considered an additional luxury.	See above.
Storage needs to be improved greatly across all size units.	See above.
Separate storage areas for flats is more common in other countries, where apartment living appears to work better.	See above.

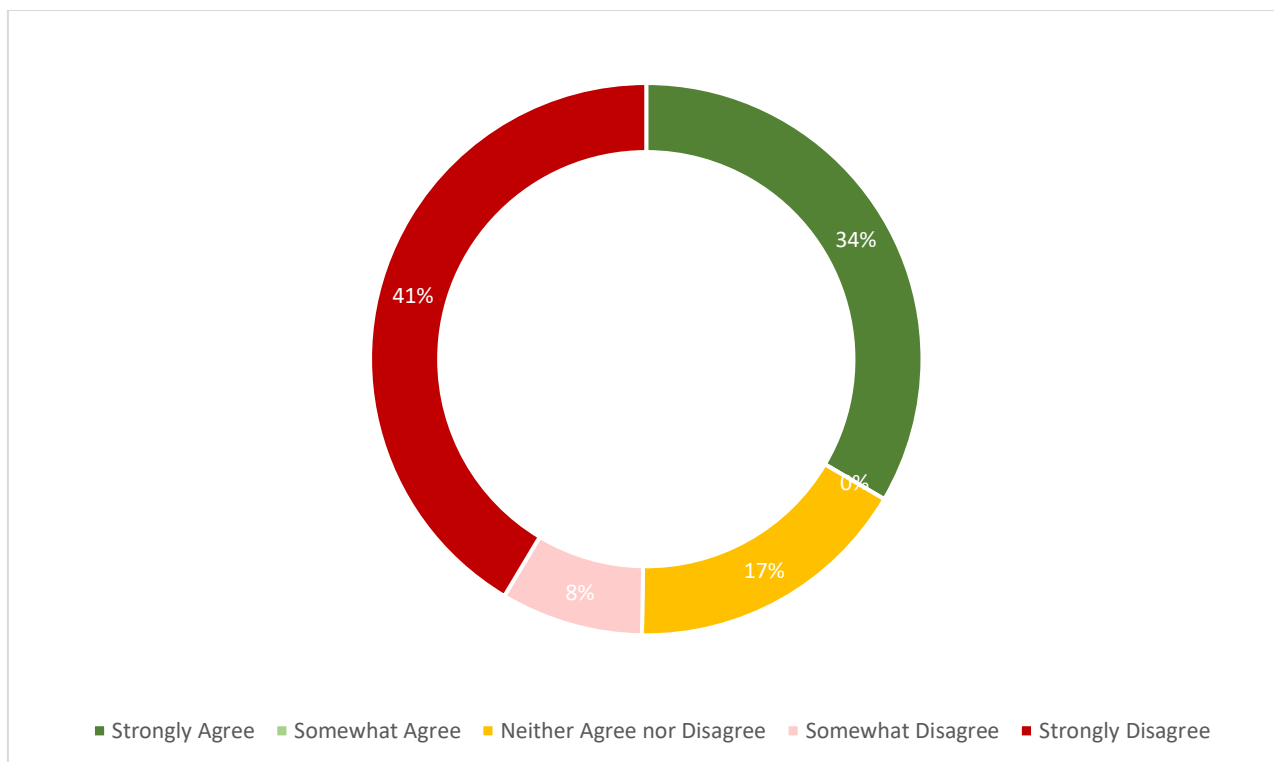
Consultation feedback	Response
Not adequate. Should be more.	See above.
Insufficient for a normal home	See above.
The levels of storage needs to increase in line with the number of people - 2 people is 3m ² so 4 people should be 6m ² and so on.	See above. The standards for storage do generally increase relative to the number of people within the property.
A few years ago, we had considered downsizing and looked at several 'luxury' flats at the waterfront. There was absolutely no storage space for things like a vacuum cleaner and a friend who had bought one kept his golf clubs in his car because there was nowhere in the flat! We then found that the 'show flat' had specially made furniture to make the rooms look bigger. Planning MUST insist ALL new builds have decent size rooms and adequate storage areas.	Change. The guidance explicitly acknowledges that storage space for everyday household items including cleaning equipment needs to be readily accessible. And also that space also needs to be provided for other belongings which are only in seasonal or occasional use, (such as luggage or tools). The guidance may be further amended to state that it is best practice to provide at least two built-in storage cupboards in every home and at least one on every floor; and to ensure that at least 50 per cent of the storage provided is located within circulation spaces.
New developments seldom have adequate storage space. Often no space for vacuum cleaner, suitcases, toolbox, or Xmas tree and decorations.	See above.
Under Paragraph 4.1.5 (p9 of the draft SPG), the SPG states that the lack of storage space is an issue "in most new homes". Really? On what evidence is this comment based?	That lack of storage is an issue in modern homes is borne out by research, and indeed the response to questions on this issue in this consultation (see other responses). <i>Research¹ suggests that: 'In the absence of controls, developers (both public and private sector) will tend to reduce the size of dwellings being developed whilst trying to minimise any reduction in value. Studies indicate a pattern of increased "cramming" of rooms (such as additional bathrooms) into dwellings leading to smaller habitable rooms and significant reductions in storage space.'</i>
In the document which I believe is the one that is currently applicable (SPG6, updated January 2009) internal storage for a 3B/5P two storey house was required to be a minimum of 6m ² . That document noted that fixed cupboards and shelves in dead areas "above work areas" etc, might contribute to this storage area. If the minimum required under the previous document for such a house was 6m ² , why has it reduced to 3m ² ? More clarification and discussion is required as to what may or may not be counted as storage, and also more justification of the eventual figure adopted.	Existing guidance differentiates between flats and houses where the storage space required for a 5-person home is set at 2.5 sqm for a flat and 6 sqm for a house. The proposed guidance removes the distinction between flats and houses and proposes a rate of provision based on the potential occupancy of a dwelling (whether house or flat) which, for a 5-person occupancy is set at 5 sqm. This exceeds both the nationally described space standard and the London Plan Guidance, both of which set minimum and best practice standards at 2.5-3.0 sqm for a 5-person home.
I understood from a recent conversation that some of the internal space can be provided in attic space – can this be clarified?	Change The guidance already states that an area with a headroom of 0.9m-1.5m (such as under eaves) may be used for storage

¹ See: Housing space standards: a report by HATC for the GLA (2006) [Housing space standards .pdf \(london.gov.uk\)](https://www.london.gov.uk/asset-upload/2006/06/Housing-space-standards.pdf)

Consultation feedback	Response
	<p>(and contribute 50% of its floor area to GIA). This will be amended to explicitly state that this may include space in the loft (where it is accessible and boarded), which may count towards storage provision.</p> <p>The guidance may be further amended to state that it is best practice to provide at least two built-in storage cupboards in every home and at least one on every floor; and to ensure that at least 50 per cent of the storage provided is located within circulation spaces.</p>
<p>To my knowledge the document does not expressly provide guidance regarding the use of attic storage which would be access via a standard loft hatch. In our office we were recently discussing the potential to fully deck out cold roof spaces. In most cases when paired with an open style attic truss this would offer great areas of meaning storage.</p> <p>In our view this is should be incentivised where possible to take the pressure away from more accessible internal storage areas.</p> <p>Noting the min height guidance please can you advise if this type of storage could in some way contribute to a percentage of the required internal storage requirements?</p>	<p>See above.</p>
<p>What about airing cupboards?</p>	<p>The guidance doesn't preclude the provision of airing cupboards. To contribute towards storage, space within an airing cupboard should be between 0.9-1.5m high, where 50% of its area might contribute to the requirement for storage space.</p>
<p>Why can't storage below 0.9m high be included (e.g. for suitcases etc?).</p>	<p>See above.</p> <p>Storage space should be accessible and easy to use. The provision of space of this size may serve this function, but should not be counted as part of overall provision.</p>
<p>Secure cycle parking needs to be clearly separate and excluded from both internal and external storage.</p>	<p>The guidance clearly states that the provision of dedicated space for cycle parking should be in addition to the minimum GIA, minimum storage space and minimum open space requirements. Cycle storage identified in habitable rooms or on balconies is not acceptable.</p> <p>This guidance is consistent with that set out in the revised parking standards.</p>
<p>This residential space standards SPG needs to cross-reference with the draft parking standards SPG. This will also include guidance on secure bicycle storage.</p>	<p>See above.</p>
<p>It needs to be clearly stated that Utility rooms should be provided for washing machines and tumble dryers, etc and are separate from storage spaces and M&E provision.</p>	<p>Change</p> <p>The guidance already makes clear that people also need suitable spaces outside habitable rooms for waste and recycling bins, washing machines and for drying clothes.</p>

Consultation feedback	Response
	<p>In a well-designed layout, best practice may include a services cupboard, with an option to include a washing machine, or space for a utility room.</p> <p>The guidance will be amended to state that segregated bins for the short-term separation and storage of waste and recycling should be provided in kitchens or utility rooms. The space used for this should not be counted towards the general storage requirement.</p>
<p>The one and two bedroomed Flat/Apartments have no provision for washing/drying machines often put into the corner of a CUPBOARD and sometimes no provision at all. So where do you wash and dry your clothes? Would suggest this will lead to DAMP and MOLD.</p>	<p>See above.</p>
<p>Also, I have viewed the one bedroom apartments in the new Horizon scheme and they all have one flaw.. they are just too small with basically no storage. The bedrooms in the one bedroom units are very small, impossible to fit in anything larger than a standard double bed. Most couples I know opt for a King size or Queen size bed but the Horizon scheme bedrooms can only accommodate a standard double.</p>	<p>The revised standards set clear minimum storage space requirements.</p> <p>The revised standards require that a primary double/twin bedroom should have a minimum floor area of 12.5 sqm: this will accommodate both a king-size (1500x2000mm) or a superking-size (1800x2000mm) bed, with associated bedroom furniture and space to use the room comfortably..</p>

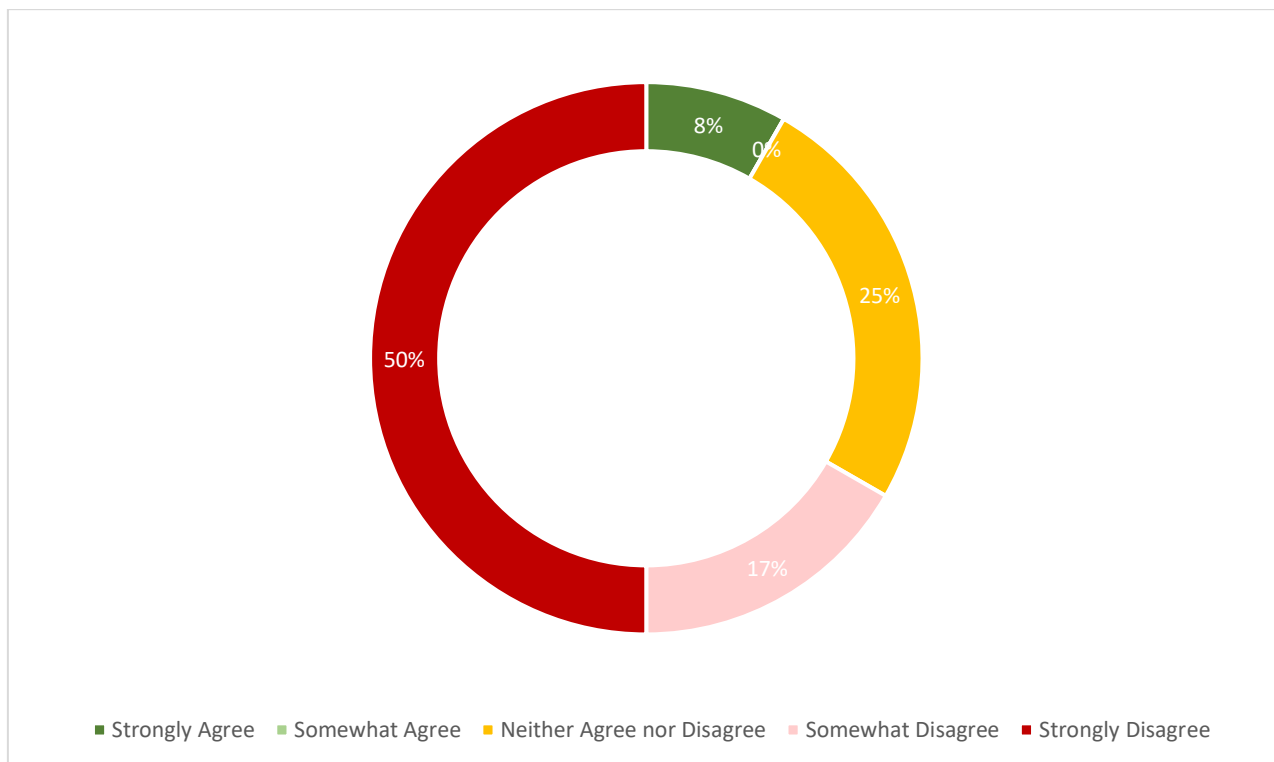
6. Please state whether you agree or disagree with minimum standards for the provision of private open space for the potential occupants of flats, as set out in table 5.



Consultation feedback	Response
Amenity space is sadly lacking in most new developments and appears to draw no criticism as part of the planning process. Notably our politicians (apart from SC) rarely mention it.	The standards for the provision of private open space, particularly for flats, has been revised to make the provision proportionate to the potential number of people who might occupy a home, relative to the number and size of bedspaces. These revised standards also reflect or exceed minimum standards for private open space in the London Plan Guidance: Housing Space Standards (July 2023). Application of existing open space standards was found to be the most deficient in terms of current practice. Revision of the guidance and its re-issue, together with the requirement to provide more easily accessible and clear information about space standards as an integral part of planning applications helps to enable a more consistent approach to the assessment of development proposals, at both a pre-application and planning application stage and to ensure that standards are being applied and met.
More open space needs to be provided in relation to flats	See above.
Visit Ann Court for an example of how not to provide space.	See above.
Not adequate. Should be more.	See above.

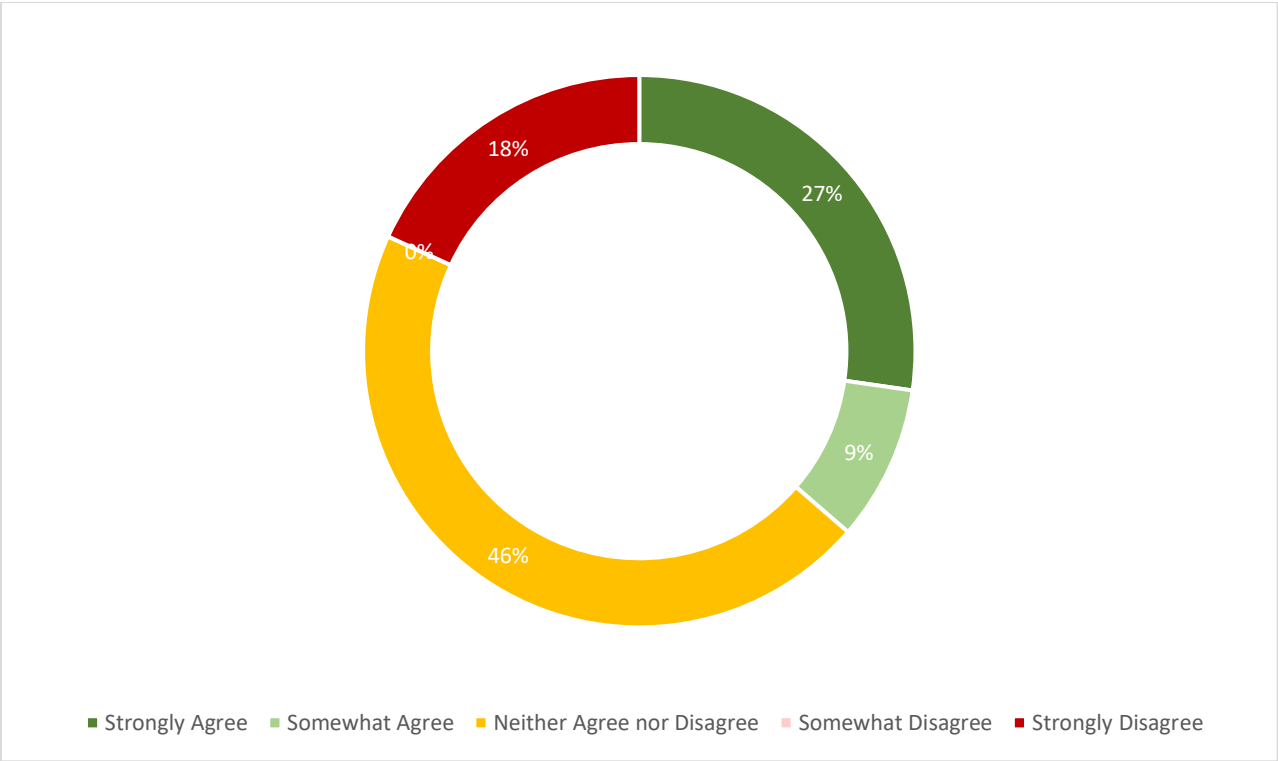
Consultation feedback	Response
Occupants need a space that is sufficient to sit and relax or play.!	See above.
The minimum size needs to equate to 'usable' area for a balcony, the 1.5m doesn't provide for balconies that are not a regular shape and allow any flexibility with the architecture.	<p>Change</p> <p>The guidance will be revised to states that for functional and accessible reasons, the minimum area of private open space must have at least four sides. Triangular and irregular-shaped balconies will need to be larger than the minimum area to achieve this requirement.</p>
Why has the minimum garden size for a 3B/5P home been increased from 50m ² to 55m ² ? This will affect density. In Hammersmith and Fulham, for instance, the minimum area for private garden is set at 36m ² . I am not suggesting that this should be adopted, but it seems counter-productive to increase the minimum size in Jersey when there is such pressure on increasing density.	<p>Private open space is desirable in all circumstances and, in general, the more private open space provided per home, the better. A 3b5p property will provide accommodation for a family and it is important that such homes have outdoor space for children.</p> <p>The Minister is revising these standards at the same time as those for the provision of car parking space, where the general level of such provision is being reduced.</p> <p>Changing the balance of provision of these elements of a home should help to ensure that more efficient use of land can be made.</p>

7. Please state whether you agree or disagree that, in exceptional circumstances, the internal floorspace of 5% of flats in a development might be provided with additional internal floorspace instead of private open space.



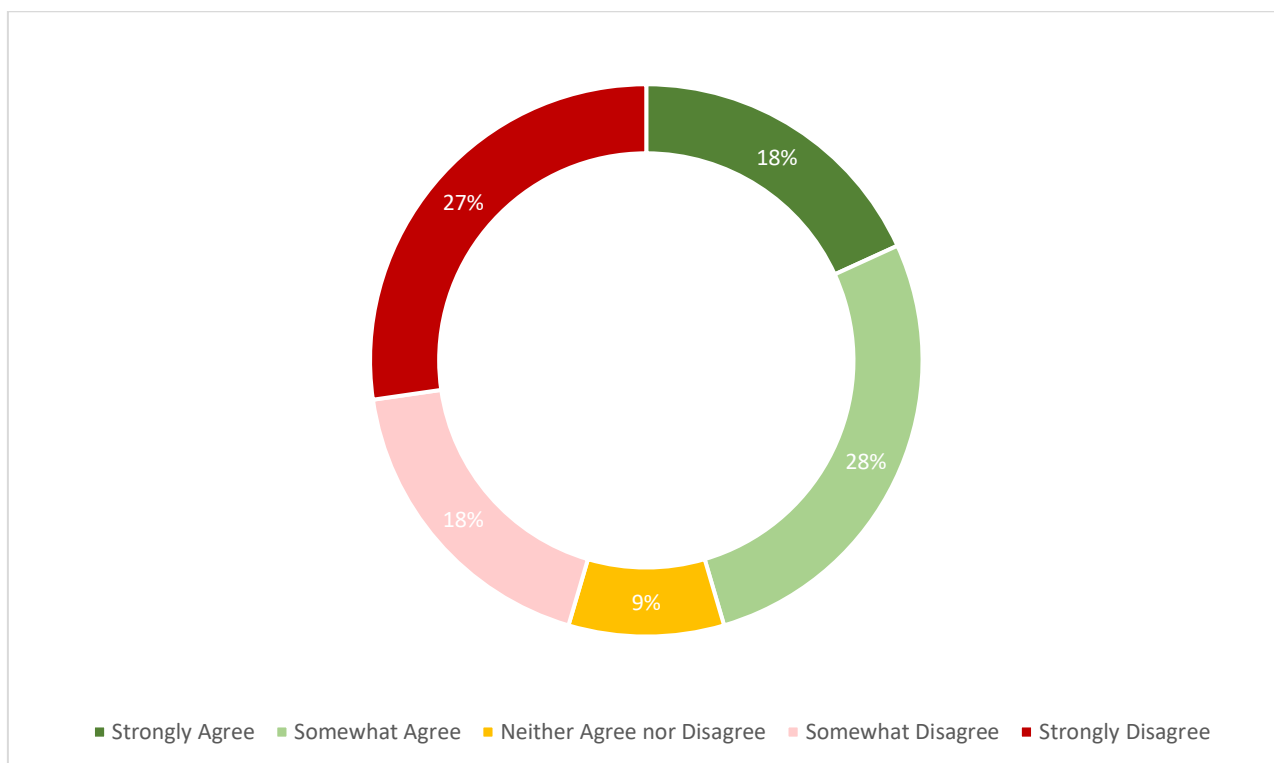
Consultation feedback	Response
The aim should be to provide outdoor space where possible. Not only does this allow people a better quality of living and enjoyment, it also provides (for example) the opportunity to dry clothes etc. without creating damp and mould issues internally.	Noted.
Occupants need a space that is sufficient to sit and relax or play.!	Noted.
An Addition of 5% internal area does not compensate for loss of external space	Noted.
Should be 100%.	Noted.
Reference to winter gardens should be reworded to encourage winter gardens with folding/sliding glazing for year-round use.	Winter gardens should be provided by exception: it is considered preferable and more beneficial to ensure the provision of private open space.

8. Please state whether you agree or disagree with minimum standards for the provision of private open space for the potential occupants of houses, as set out in table 6.



Consultation feedback	Response
Occupants need a space that is sufficient to sit and relax or play.!	<p>The revised guidance provides for sufficient amenity space relative to the number of occupants.</p> <p>Island Plan Policy CI8 Space for children and play, requires the provision of dedicated play space in addition to amenity space for development of five or more homes.</p>

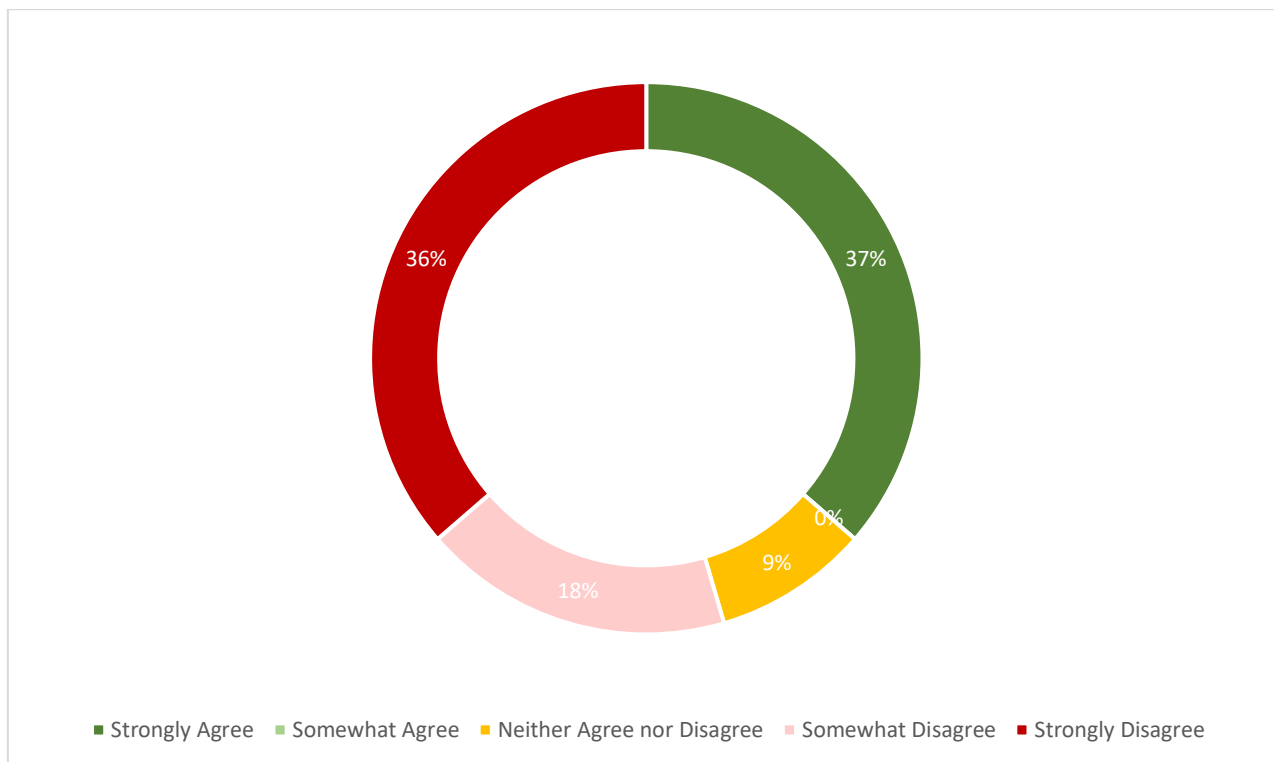
9. It is proposed that development containing five or more flats should provide shared open space on site, in addition to the provision of private open space for each flat. Please state whether you agree or disagree with minimum standards for the provision of shared open space for the potential occupants of flats, as set out in section 4.2.6 and table 7.



Consultation feedback	Response
<p>Shared space is rarely used and ideally each flat should have its own space. Ideally do away with shared space completely and provide sufficient space for each flat</p>	<p>The revised guidance acknowledges that the provision of private open space should be afforded a high priority and, in general, the more private open space provided per home, the better.</p> <p>The guidance requires that all dwellings should be provided with adequate private open space in the form of a garden, terrace or balcony.</p> <p>This guidance alters the proportion in favour of direct private open space provision, which is considered to be of more benefit to the health and wellbeing of residents.</p>
<p>The maximum provision of 25% does not contribute substantially to improving public realm, landscape and carbon targets in the main and more value should be accredited to the external environment to support better standards of living.</p>	<p>The revised guidance acknowledges that the provision of private open space should be afforded a high priority and, in general, the more private open space provided per home, the better. This guidance alters the proportion in favour of direct private open space provision, which is considered to be of more benefit to the health and wellbeing of residents.</p> <p>The guidance requires that all dwellings should be provided with adequate private open space in the form of a garden, terrace or balcony.</p> <p>Application of existing open space standards was found to be the most deficient in terms of current practice. Revision of the guidance and its re-issue, together with the requirement to</p>

Consultation feedback	Response
	provide more easily accessible and clear information about space standards as an integral part of planning applications helps to enable a more consistent approach to the assessment of development proposals, at both a pre-application and planning application stage and to ensure that standards are being applied and met, including in the provision of shared space.
Not adequate. Should be more.	See above.
Occupants need a space that is sufficient to sit and relax or play.!	See above.
Provided there is still the private space, additional shared space should be welcomed.	See above.
The proportion of shared open space is inadequate, it needs to be prescribed as dedicated space for residents and clearly state that it should be separate from external circulation, access, footpaths, etc.	The guidance sets out that these shared open spaces should be designed as dedicated open space, with appropriate form, function and utility. The guidance also stipulates that shared open space should not simply comprise the space that is left between buildings, parking and external circulation space.
Providing up to 25% of the site area is land hungry and will increase the cost of housing. This is too onerous, particularly for town centre sites.	The Minister is revising and issuing guidance that deals with all key aspects of residential development, including density; residential space standards; and residential parking standards. The combined effect of all of this revised guidance should help to promote viability and deliver more and better residential accommodation on development sites.
4.2.6 Off-site contribution for play areas I remain concerned that these types of contributions attached to Planning permission increase the cost of development without increasing the quality of life for the occupants. In many cases I don't believe the occupants of new homes will be the direct beneficiary of such items funded. I appreciate that without such requirement, we may not see a scale reduction in the rent/purchase price of the unit, so would propose that the value of the contribution should go on interior fittings or investment in the property that, whilst unlikely to increase the rental value or sale price of the unit, increases the quality of life of the occupants.	This is a policy provision that is set out in bridging Island Plan Policy CI8 – Space for children and play and, therefore, not capable of amendment through guidance.
Change threshold for play space to ten homes	See above.
The provision of dedicated play space is land hungry and will increase the cost of housing.	See above.

10. Please state whether you agree or disagree that, in residential developments of 20 or more homes in Town or Les Quennevais, up to of 5% of flats might be provided as genuine single person dwellings, as set out in the standards at section 5.2.



Consultation feedback	Response
<p>There are many positive uplifts in requirements set out in this SPG, however I am concerned that there are still some gaps that will mean that some units of accommodation will still be too small to provide quality of life and an adaptable space. My focus has been on the single storey dwelling. Below are my comments and recommendations on this area.</p> <p>Fundamentally I have issues with 1 bedroom 1-person & 2 bedroom 3-person apartments still being allowed to be constructed. As Jersey has limited space and does not sit in a “commuter” area, the homes we are needing to be built need to be sustainable. 1b1p & 2b3p apartments will generally be stop gap apartments and not long term homes, we have also allowed a significant amount of these types of apartments to be built and I believe now is the time that these are stopped. With no advertising standards or requirements to present maximum occupancy in Jersey, we are seeing apartments being over occupied already.</p>	<p>The planning system can regulate the size of homes, but cannot regulate the number of people who might occupy residential accommodation. It can seek to ensure that homes are appropriately designed to ensure that they are capable of providing good quality accommodation for the number of people that the home it is designed to accommodate, relative to bedspace and its size.</p> <p>Results from the 2021 Census suggest that using the ‘Bedroom Standard’² measure of over-crowding, 1,783 households could be classed as ‘overcrowded’, having fewer bedrooms than required by the standard (this is not, however, a measure of bedroom size). This represents 4% of all households. The proportion of households classed as ‘overcrowded’ decreased marginally over the 10-year period, from 4.5% in 2011 to 4.0% in 2021. A greater proportion of households (26.4%) were ‘under-occupied’ in Jersey on census night 2021.</p>

² The ‘Bedroom Standard’ (UK Housing Overcrowding Bill, 2003) defines the number of bedrooms that would be required by the household, where a separate bedroom is allowed for each married or cohabiting couple, any adults aged 21 or over, pairs of adolescents aged 10-20 of the same sex and pairs of children under 10 years. Unpaired persons of 10-20 years are notionally paired with a child under 10 of the same sex.

Consultation feedback	Response
<p>Continuing with these types of apartments will see overcrowding become the norm, leading to health and wellbeing issues to increase, and therefore should be stopped.</p> <p>Recommendation 1 – Remove 1b1p & 2b3p from the standards and ensure all 1 bedroom apartments meet the 2 person standard and 2 bedroom apartments meet the 4 person standard.</p>	<p>Household size in Jersey has been declining over the last five decades meaning that fewer people live together as a household: the average household size in 2021 was 2.27. These trends mean that the island community has a greater need for smaller homes, simply as a consequence of demographic change.</p>
<p>They start out as single occupancy but invariably finish up as double.</p>	<p>See above.</p>
<p>This feels like an excuse to make the dwellings smaller because "only one person lives there" which should be avoided.</p> <p>The standard should be based on the bedrooms and not how many live there.</p>	<p>Change</p> <p>All islanders, regardless of their age, background, household composition, residential or financial status, have a right to be housed adequately.</p> <p>Residential space standards have been set based on the maximum number of people who might occupy a home. This reflects the number and size of bedrooms and their potential occupancy.</p> <p>On this basis, the space standards set out the gross internal floor area of homes which allows for the minimum amount of space to be provided for living room, dining room and kitchen space; and bedrooms, based on its potential occupancy, even where that is one person.</p> <p>The revised space standards for single person homes have been significantly increased (from 34.5 to 40 sqm) and exceed those minimum standards adopted in London nationally in the UK (39 sqm).</p> <p>The guidance is to be revised to further increase the space standard for a one-bedroom one-person home, to provide additional flexibility in the use of space, including home working.</p>
<p>Accommodation should be flexible and not small 'rabbit hutches'</p>	<p>See above</p>
<p>Occupants need a space that is sufficient to sit and relax or play.!</p>	<p>See above</p>
<p>Starter homes must be treated differently, as should those for retirees downsizing.</p>	<p>See above.</p>
<p>Space standards need a proviso for starter homes - i.e. 50% reduction to make them affordable, otherwise the poverty gap is just continuing to grow!</p>	<p>See above.</p> <p>Housing affordability is also a key issue in the island: in 2021 a working household with mean net income was not able to service a mortgage affordably on the purchase price of a median-priced house of any size or a 2-bedroom flat; but was able to service a mortgage affordably on the purchase price of a median priced 1-bedroom flat.</p> <p>Work is being undertaken by this government, and specifically the Minister for Housing and Communities to improve access to and affordability of housing for islanders.</p>

Consultation feedback	Response
<p>Yes, but as above, people need choice. That means providing starter and retirement homes for people with little or no possessions, who want what they can afford, built to a good standard, with eco compliance to minimise bills.</p> <p>Yes there must be a filter to prevent overcrowding, but unless we are determined to drive more of the youngster born here off the Island, there must be this low cost starter solution, right now, before it is too late, and many more Jersey-born youngsters are driven off island, only because of the high price of housing. Currently homes on the South coast of England are 1/2 the Jersey prices, and in Northern areas, much less.</p> <p>To implement ever larger standards across the board is to continue the debacle of previous governments - drive away our futures!</p>	See above.
<p>Starter homes must be treated differently, as should those for retirees downsizing.</p>	See above.
<p>I am really worried that our politicians are too focussed on homes getting bigger (a popular idea for many) but I strongly feel we should also be promoting the c38m2 homes for young Islanders as their first home and independence either from their parents homes, or to coax them back here after university. We really need this to happen.</p> <p>Schemes would have to be regulated and really well designed , like the Pocket Living developments, with decent shared green spaces, private outdoor spaces and ideally some cool ground floor social/commercial spaces like work-cafes.</p> <p>I take your point that the SPG technically does support this, but I feel it could do with being amplified and more explicit. For example, if my figures are correct:</p> <ul style="list-style-type: none"> • Affordable Gateway is available for single adult earning under £32,300 pa • 1-bed affordable apartment at College Gardens currently selling for £355,000 • Less 10% Gov.je assistance (which they retain)= £319,500 • Less 10% deposit (£17,750) on the higher figure= £310,750 • Less max mortgage someone on £30k per year can get, of £150,000, still leaves a deficit of £151,750! <p>How's that ever going to work? Arguably larger Gov.je would be a possibility but if you apply a 38m2 vs. 54m2 ratio, the deficit becomes c. £107,000 and maybe easier for Gov.je to assist with?</p> <p>Attached financial example which, if my figures are correct, demonstrates how unaffordable a 1-bedroom</p>	See above.

Consultation feedback	Response
apartment is to a young Islander, even through the Affordable Gateway. This is intended to reinforce my objection to 38/40m ² smaller 1-bed units being marginalised in the SPG, when they could be part of the housing crisis solution with the caveats made earlier.	
The price of these flats mean that people are unable to get on to the housing ladder until later in life and as such must consider delaying having a family etc as they simply do not have the space.	See above.
Of course. Some people are single and those people deserve space and dwellings, but don't say they're for single people but then only make them affordable on two incomes.	See above.
Increasing the space for each home may be ideal, but not practical for first time buyers and those on the lowest incomes. More important is the homes should be of both affordable and a good standard. Starter couples and downsizing retirees we talk to simply want something affordable - this means creating starter homes which are much more affordable, so inevitably much smaller, so that people can at least have somewhere to call their own.	See above.
Level of provision is too low: it should be 10% for development of 10 or more units. Sustainable locations agreed.	Change The guidance is to be amended to incorporate the one-bed/one-person standard throughout the guidance and not to limit the extent or location of its provision.
In the UK, many cities are now providing small studio apartments which can be as small as 26 sq. metres overall internally. These fulfill a demand by students and young people who want to get on the property ladder but can't afford a larger one bedroom apartment. These smaller studio dwellings are proving very successful. Why can't we have policies allowing these smaller dwellings with another policy focusing on the larger one bedroom dwellings.?	It is quite clear that guidance in the UK for all self-contained residential accommodation (use class C3 under UK planning legislation) sets minimum standards for 1b1p homes at, at least, 39 sqm (or 37 sqm where a shower room is provided instead of a bathroom). The other forms of accommodation referred to are specialist forms of housing such as shared living, temporary accommodation and student accommodation. These revised Jersey standards do not provide guidance for this form of living accommodation and will deal with proposals for them, where applications for this type of development are made, on their merits. They will be assessed in a similar manner to that proposed for accommodation designed for short-term occupancy, where any departure from adopted standards will need to be appropriately justified.
Alternative types of accommodation need to be catered for including 'Pocket living' as entire developments and not piecemeal additions to residential developments. This is a different development model from traditional accommodation and needs to be included specifically in the Standards	See above

Consultation feedback	Response
<p>as such, it is not simply a case of being a percentage of smaller units but should have its own clear design criteria, including for work space, communal facilities, etc.</p>	
<p>Likewise I am concerned that there is limited flexibility of the guidance for smaller units of accommodation in 5.2.</p> <p>Whilst I accept the intentions to generate homes with a minimum expectation of quality of enjoyment there are circumstances where existing property conversions are only economically viable accommodating a proportion of smaller units. If we do not effectively and efficiently provide economic solutions for these usually underutilised or redundant buildings/spaces we face the real prospect of these not being achieved and existing property/space retained as functionless, exacerbating the local affordability housing crisis and impacting the delivery of the accommodation units required.</p> <p>There are many examples of micro-living solutions that do not generate poor quality living conditions if designed well. I would like to see a little more flexibility in the delivery of these in accommodation that aims to regenerate existing buildings, the emphasis in the SPG of provision for single person occupancy is for larger residential developments which are likely in the majority to be new build.</p> <p>Some flexibility in the guidance would secure the most balanced reuse of our existing building stock and achieve units of accommodation that serve a wider affordability for Islanders.</p> <p>As an Island we have an ageing population, a local housing crisis of affordability, a cost of living crisis, an energy crisis, environmental issues coupled with local staff recruitment and retention issues, we need to be thinking more proactively about investing in the infrastructure that we have to maximise efficient use of those existing resources, be imaginative in the way this is delivered to provide quality homes and places where people want to live, achieve this in the most economically viable way to ensure affordability to retain islanders on Island and encourage new islanders to ensure the next generation can afford and support the expanding ageing population.</p> <p>I think we need more clarity on the guidance of the periphery elements as well as the mainstream flats and houses standards focussed, so that the Planning Officers / decision makers on the ground have more definition in the delivery of potential accommodation from existing building stock.</p>	<p>All islanders, regardless of their age, background, household composition, residential or financial status, have a right to be housed adequately.</p> <p>Residential space standards have been set based on the maximum number of people who might occupy a home. This reflects the number and size of bedrooms and their potential occupancy.</p> <p>On this basis, the space standards set out the gross internal floor area of homes which allows for the minimum amount of space to be provided for living room, dining room and kitchen space; and bedrooms, based on its potential occupancy, even where that is one person.</p> <p>The revised space standards for single person homes have been significantly increased (from 34.5 to 40 sqm) and exceed those minimum standards adopted in London nationally in the UK (39 sqm).</p> <p>The guidance is to be revised to further increase the space standard for a one-bedroom one-person home, to provide additional flexibility in the use of space, including home working.</p> <p>The guidance also clearly states that <i>'It is recognised, however, that there will be some limited circumstances where the blanket application of planning standards may be counter-productive in achieving the best design solution, or outcome for the existing and future community. Any variation from the adopted residential space standards will require justification but a flexible application of this guidance will be adopted where it can be demonstrated that:</i></p> <ul style="list-style-type: none"> • <i>there are particular physical constraints of a site or a building which prevent the standards being met, and which otherwise can't be addressed by reducing development density and yield, or through suitable design alterations;</i> • <i>there are other overriding planning considerations, such as managing and/or limiting the impact on protected listed buildings;</i> • <i>in very limited circumstances and where there is exceptional justification, smaller homes are required to be provided in order to meet a proven housing need, which might include residential accommodation designed for short-term occupancy or shared use.</i> <p><i>Where any homes are proposed to be provided for short-term occupation there will also be a need to demonstrate that their use and occupancy can be effectively regulated to prevent medium- or long-term occupancy.</i></p>

Consultation feedback	Response
	<i>In all cases, any deviation away from adopted residential space standards will need to demonstrate that this would not be detrimental to the health and wellbeing of intended occupants or users of the development and the quality of place.</i>
Dual aspect may reduce yield and unlikely to be achievable and is unnecessary.	Change The guidance is to be amended to incorporate the one-bed/ one-person standard throughout the guidance and not to limit the extent or location of its provision.

11. Would you like to add anything else?

Consultation feedback	Response
<p>Stop building flats, please stop building flats. Nobody wants them. Our kids and the current young people (I think the youth parliament as well) want FAMILY HOMES with a garden.</p> <p>There's nothing more infuriating than a wealthy politician living in a large house with private green space saying that young people should be living in flats (this has happened).</p>	<p>Household size in Jersey has been declining over the last five decades meaning that fewer people live together as a household: the average household size in 2021 was 2.27. In addition, 26.4% of households were 'under-occupied' in Jersey on census night 2021.</p> <p>These trends mean that the island community has a greater need for smaller homes, simply as a consequence of demographic change.</p> <p>Housing affordability is also a key issue in the island: in 2021 a working household with mean net income was not able to service a mortgage affordably on the purchase price of a median-priced house of any size or a 2-bedroom flat; but was able to service a mortgage affordably on the purchase price of a median priced 1-bedroom flat.</p> <p>The island plan seeks to ensure an adequate supply of and that the size and type of housing being delivered is appropriate and meets the community's identified need.</p>
<p>The number of 1-bed flats being built also outweighs the demand. People need larger spaces and homes. They do not want 1-bed flats. As such, these properties are being used as "homes" for the wealthy who need a Jersey address (and thus standing empty) or going on to the rental market and inflating the cost of rents.</p>	<p>See above.</p>
<p>Andium appear to be working at pace to deliver much needed housing units and also appear to be maintaining their existing estate to a good standard.</p> <p>Private developers such as Dandara have built some pretty poor units with no storage and will push the envelope whenever allowed.</p>	<p>The standards set out in this guidance apply to all forms of residential tenure, including owner-occupied, private rental and subsidised housing. No distinction is made between tenures in terms of the amount of internal and external space to be provided.</p> <p>Decision-makers will be required to have regard to the guidance in this advice note, as a material consideration, in assessing all proposals for new residential development and the extent to which development proposals comply with them.</p> <p>The review and re-issue of residential space standards helps to provide and ensure a more consistent approach to the assessment of development proposals, at both a pre-application and planning application stage.</p>
<p>When significant planning approvals lead to a meaningful monetary uplift in development value, a proper levy should be applied, not the current sop of percentage for art (the administration of which seems cosy).</p>	<p>To support the Plan for Town, the Island Plan proposes the introduction of a Sustainable Communities Fund to invest in improvements over the long-term by capturing a small proportion of the value created when planning consent is given, and recognising that it is legitimate to use this to</p>

Consultation feedback	Response
	<p>make wider improvements to benefit the local communities in which development occurs.</p> <p>The States Assembly have endorsed a proposal to explore the introduction of a development levy by March 2025. If introduced, this may provide the mechanism to lever further funding for investment in community infrastructure in St Helier.</p> <p>Percent for art is a mechanism requiring a developer to allocate a proportion of the costs of new development towards the provision of public art. The scheme aims to benefit the island by integrating art and craft of the highest quality into our built environment, promoting community-led planning, and developing a legacy of public art and artistic expression.</p> <p>The requirement to deliver public art is managed through the planning process, the administration of which is entirely open and transparent, and can be found online here: Planning application search (gov.je).</p>
<p>The piecemeal development of Jersey and St Helier in particular is clearly failing to provide liveable neighbourhoods, transport solutions or opportunities for healthy activities and cultural experiences (spare me the ‘food’ fares and seaside ‘festivals’ disguising booze ups and punch ups.</p> <p>I strongly agree with Simon Crowcroft that a coherent plan for St Helier is required before the quality of life deteriorates further for town residents. Town living could and should be desirable with access to green space, amenities and culture.</p> <p>Final observation: parking spaces in St Helier are inversely correlated to coffee shops. Perhaps that was the vision and je gov have delivered on something.</p>	<p>The bridging Island Plan recognises that the sustainable development of the island hinges on the sustainable development of Town and sets out, for the first time, a strategic Plan for Town (see volume two: places – Plan for Town). This plan advances eight strategic concepts, underpinned by detailed policies, that seek to create a town that is better for people to live in, with more open space; good homes; an improved built environment and the schools, jobs and other community facilities and services that support a better quality of life and the creation of a better place.</p>
<p>The cramming of St Helier, particularly with small flats, is creating a ghetto in northern St Helier.</p>	<p>See above.</p>
<p>There is far too much emphasis of maximising the number of units on a site. A few less and better quality/size would be of benefit to the community.</p> <p>The lack of choice means owners/tenants are always ‘making do’, and this results in overcrowded, cramped conditions, which is not conducive to the Islands happiness and prosperity.</p>	<p>There is a clear need to provide more homes in Jersey. Most of the homes to be delivered to meet the island’s housing needs will be in the island’s built-up areas, where higher density of development will be encouraged to make sure that we make best use of Jersey’s limited supply of land. Denser, more compact forms of development, such as flats, apartments and maisonettes, can create thriving and vibrant communities, and places where people want to live. There is, however, a balance to be struck between the drive to use land more intensively, delivering the numbers of much needed new homes, while still creating successful places where people can live healthy lives.</p> <p>The new minimum space standards at the heart of this guidance will improve residents’ health and</p>

Consultation feedback	Response
	<p>quality of life. Closer assessment of development proposals and better use and application of minimum standards will provide more generous housing, encouraging sociable rooms within homes, giving individual family members private space when they need it, and ensure that residents have access to and can enjoy quality open space.</p>
<p>Under Paragraph 4 (p of the draft SPG) the document refers to “flexibility”. It is my understanding that Andium, for instance, do not really want to encourage flexibility in house design for the reason that they would prefer tenants or first time buyers to have limited opportunity to adapt their homes so that they move on and free the original unit for other upcoming tenants/buyers. However, p5 of the SPG states that the intention is to “better ensure that new homes in the Island are able to accommodate changing personal circumstances”.</p>	<p>The new standards and guidance are intended to encourage provision of enough space in dwellings to ensure homes can be used flexibly and are more responsive and resilient to changes in the way we now live.</p> <p>Andium Homes are a large affordable housing provider with a large housing stock with homes of various forms and sizes where they are more able to match tenants with specific house types to suit their changing needs. The point raised is a housing management issue that is not material to the establishment of minimum space standards for all homes, whatever tenure.</p>
<p>Under Paragraph 4.1.1 (p7 of the draft SPG), I am totally at a loss as to understand why restricting GIA to a maximum of 279m² “will ensure that homes remain accessible to Islanders”. Can the Government explain how this will work in practice? Does this mean that all houses will inevitably be available to all islanders if they are under this area figure? This whole aspect of policy is one that is spread across many new or pending policy initiatives and needs to be understood and discussed in terms of its knock-on consequences before it is even considered for adoption.</p>	<p>See adopted guidance related to Density standards (gov.je) and Housing outside the built-up area (gov.je).</p>
<p>It is recognised that the intention of 4.11 Gross Internal Area is “guidance as the minimum gross internal areas (GIA) for new homes” I would question the relevance of setting a maximum allowance - “To ensure that the homes provided remain accessible to islanders and best meet housing needs, GIA should not exceed 279 sqm” There are many challenges and issues to controlling/setting an upper limit to development as was recently consulted on separately in October 2022, these remain surely relevant.</p>	<p>See above.</p>
<p>Under Paragraph 4.1.3 (p8 of the draft SPG), what is the rationale of taking such rooms as home offices over 8m² as needing to be counted as bedrooms? Other parts of the SPG seem to be encouraging provision for home office space. If such a space is at ground floor in a conventional two storey house it obviously <i>can</i> be used as a bedroom, but is unlikely to be used as such, and even if it is, it would probably only be on a sporadic basis for guest accommodation. My teenage son quite often has guests staying over on the settee – is this a problem too?</p> <p>If a Utility space or ensuite bathroom is over 8m², (both of which are described in the SPG as additional rooms) must it be taken as a bedroom?</p>	<p>Rooms capable of being used as a bedroom have the potential to increase the overall occupancy of the home and need to be considered as such relative to the adequacy of other aspects of the home (i.e. living, dining and kitchen areas).</p> <p>The provision of dedicated study areas will be encouraged but to avoid being classed as a bedroom, they should be below 8 sqm.</p>

Consultation feedback	Response
<p>Counting rooms over 8 sqm as bedrooms will discourage developers in providing study areas and rather provide an additional single bedroom with no study area.</p>	<p>See above.</p>
<p>Under Paragraph 4.1 (p6 of the draft SPG), what is the reason for suggesting that ceiling heights be a minimum of 2.5m as opposed to the usual dimension of 2.4m? This will result in increased wastage of material, as standard plasterboard sizes are 2.4m high. It may also require additional risers on staircases, thereby putting more pressure on the overall accommodation. It will also obviously increase the costs of development and carbon footprint, which seems at odds with the intention to try to bring down the cost of housing and the wider sustainability policies. 2.4m has been fine for years, so why change it? The guidance is unclear as to whether this is a requirement or not.</p>	<p>The height of rooms in a dwelling dramatically affects the perception of space in a home. A small increase in ceiling height can make the difference between a home feeling cramped or generous. When matched with generous window sizes, higher ceilings also improve natural light levels and ventilation, and the depth to which light penetrates a room.</p> <p>In ground floor dwellings where daylight may be limited, higher ceilings can provide better light levels, a better urban scale to the base of larger buildings, the potential for homes to be used more flexibly, and can make ground floor dwellings more suitable for conversion to non-residential uses.</p> <p>The London Plan Housing Design Standards (June 2023) sets a standard (at C2.3) where a minimum ceiling height of 2.5m is required for at least 75 per cent of the gross internal area (GIA) of each dwelling to enhance the spatial quality; improve daylight penetration and ventilation; and assist with cooling. Any reduction (from 2.5m) in floor-to-ceiling heights should only be for essential equipment in the ceiling voids above kitchens and bathrooms.</p> <p>It further suggests that it is best practice (C2.40 for the floor-to-floor height of ground-floor dwellings to be at least 3.5m in order to promote flexibility and greater daylight; and allow for easier conversion to non-residential uses if required.</p> <p>Reference to an increase in ceiling heights is not a requirement of the revised Jersey standards, but will be encouraged for the reasons set out above.</p>
<p>Just another note to say (for example), that a designers approach to say an individual one bedroom ground floor dwelling is quite different to a one bed unit(s) in a development of flats. One of the problems in the Les Quennevais area in particular is that people like ourselves who live in a proper family home and who might look to sell up and move to something smaller nearby have very little choice and don't really want to leave Les Quennevais, as just about every facility, shops, banks, doctors, dentists, and the best most reliable regular bus service on the island (free for us) which gives us a virtual door to door travel.</p> <p>The same can be said for most sizes of 'bungalow' type homes and most sizes of flats. As I'm getting older, living requirements change and I'm not sure how just how many others up here are in the same situation. I know that some time ago there was a 'planning group' formed but I'm unsure as to what was achieved at the end of the day. Certainly 1 person, 2 person, and 3 person units even if they were in small groups or even serviced flats</p>	<p>The bridging Island Plan Policy H4 – Meeting housing needs states that in order to ensure the creation of sustainable, balanced communities, the development of new homes will be supported where it can be demonstrated that it positively contributes to meeting identified housing needs of the local community or the island, in terms of housing types, size and tenure, having regard to the latest evidence of need. Residential developments of five or more dwellings should, in particular, include a proportion of smaller homes to encourage and enable 'right-sizing, where appropriate.</p> <p>The proportion of flats to houses built since 2011 is about 60:40, with the majority of flats providing 1-bed and 2-bed homes.</p>

Consultation feedback	Response
would I think result in the release of family units.... but I suppose the value of these homes in today's market might be not be attractive.	
Support for the SPG from the Minister for Health and Social Services with no further comments.	Noted.
<p>Under Bye laws Part 8, Access for all, there is various requirements, which don't seem to be considered in you doc, as per below comments.</p> <ol style="list-style-type: none"> 1. 2/3 storey houses, require a downstairs toilet, you document requires additional cloaks/bathroom to be added on, so your working from a negative straight away, just add this area on to include a cloaks. 2. All properties multi storey properties have to have a either a wide stair or allowance for a through floor lift, I have done a few sketches but can't get your area figures to work through, or are we to suppose the storage areas will be lost if a lift has to be installed? 3. Bathroom areas, corridor widths, etc, theses are all covered under disability, again looking at a few previous schemes, the areas don't work with the new min bed sizes, etc. 	All homes are required to meet the building bye-law requirements for access to and use of buildings, these standards are not necessarily expected to facilitate fully independent living for wheelchair user dwellings which should meet design requirements that are specific for these types of dwellings.
<p>As identified in my response on Residential Parking Standards, more clarification is required on the typology of use in respect of Houses in Multiple Occupation (HMO) and the terminology of lodging accommodation in respect of both Planning and Building Control. This is referred in the Glossary of terms without detail. Further consideration should be given to the clarification of these type of units and the modernisation of the requirements in order that these types of units can become a practical and viable acceptable option as part of the solution to achieve affordable accommodation for Islanders.</p> <p>Further clarification of guidance on short term residential occupancy is required, and the terminology of lodging accommodation / staff accommodation / key worker or rural workers accommodation needs clearer guidelines. There is a lack of affordable accommodation in these sectors and a potential lack of provision within BIP Policy H8 for key worker accommodation units, suggesting a policy intention of providing "a minimum of 25 key worker units a year over any plan period".</p>	<p>Lodging accommodation is adequately described in the glossary.</p> <p>References to HMOs should not be misconstrued or conflated with the definition of the same derived from other planning systems.</p>
<p>In the SPG under section 5.1 it is good to see that recognition is given to the need to provide accommodation for short term temporary workers differently to that specified for life long living accommodation.</p> <p>However, the requirements as set out for applicants are in, our opinion, highly subjective to individual Minister's views. We do not believe this provides the clarity required for businesses and would welcome something more prescriptive along the lines of the Code of Practice proposed in 1991 (P144) by the then Public Health Committee and supported by the Housing, Tourism, Agriculture & Fisheries Committees as well as the Island Development Committee, relating to Lodging House & Staff Accommodation Standards. Such a Code would promote minimum standards and provide greater guidance and certainty. I have attached a copy of the 1991 Proposition for your information.</p>	<p>Whilst the code of practice referred to does set some space standards, these are limited to bedrooms only. Whilst the provision of other facilities, such as bathroom and cooking facilities are referenced, there is no consideration of space, but just ratios for the use of shared facilities. Similarly, the code also references issues, such as ventilation, lighting and fire safety, which are outwith the scope of this planning guidance.</p> <p>It remains for the applicant to justify any departure from the revised space standards for residential development. Reference to other 'standards' or 'practice' may form any part of such justification,</p>

Consultation feedback	Response
	but should be relevant and appropriate to the matters set out in this guidance.
<p>Our discussions also focused on the challenges of sourcing accommodation for seasonal/temporary staff generally as well as the costs of constructing new build accommodation. We also touched upon the type and specification of other examples of temporary worker accommodation such as PBSA – Purpose Built Student Accommodation – or the UK Army’s SLA – Single Living Accommodation – both of which I believe is classified differently under UK Planning. It would be greatly beneficial if this subject could be the focus of some fast track discussion and consideration by Government</p>	<p>Proposals for other forms of accommodation that are designed for temporary occupation – such as purpose-built student accommodation – will be considered on their merits relative to the established space standards for residential accommodation that is designed to be used for permanent occupation.</p> <p>The need to develop specific standards for this form of use will be kept under review.</p>
<p>We provided examples of very recent building cost estimates for two projects that we presently have under consideration – one is for a development of additional one bedroomed units within an existing building envelope at a cost of approx. £275,000 per unit and another is for a development of one and two bedroomed units on a brownfield site that is already owned at a cost of £480,000 per unit. Both projects are specified according to the relevant SPG’s relating to Residential Space Standards. Clearly the costs of constructing these are far in excess of what might be deemed affordable for staff accommodation on the financial return based upon the maximum offsets we are able to charge under the Minimum wage legislation. The impact of providing staff accommodation to this specification and cost may cause many in the visitor accommodation to reconsider any future investments and potentially encourage further exit from the industry.</p>	<p>The cost of undertaking development is noted.</p> <p>The Minister is revising and issuing guidance that deals with all key aspects of residential development, including density; residential space standards; and residential parking standards.</p> <p>The combined effect of all of this revised guidance should help to promote viability and deliver more and better residential accommodation on development sites.</p>
<p>Whilst it is recognised that the Planning Department do provide an opportunity for pre-application advice in relation to projects there is a feeling amongst a number of architects with whom we have spoken that the caveats imposed upon such advice make it somewhat redundant as an exercise in the planning process.</p> <p>An observation is that ultimately under the current system vision and entrepreneurship is stifled as change and challenge to the norm does not appear to be encouraged or supported.</p>	<p>The pre-application service is to be reviewed as part of the response to the Review of Planning Services (2023).</p> <p>The Minister would be pleased to receive evidence that might demonstrate the stifling of vision and entrepreneurship through the planning process; and to consider the basis for this, in order to consider potential change, where it is justified.</p>
<p>If not already included in guidance for new property development I feel that inclusion of catchment water systems to run toilets / garden irrigation instead of using treated water would help to maximise capacity in reservoirs.</p> <p>We have two toilets using catchment water and significantly save on our Jersey Water bill</p>	<p>Bridging Island Plan Policy UI3 – Supply and use of water states that <i>‘...new development should incorporate all practicable water conservation and management measures to reduce water consumption and help conserve the island’s water resources. Large-scale development proposals (with a non-residential gross internal floorspace of 200sqm and above, or five or more dwellings) that require a water supply will only be supported where they clearly demonstrate how water consumption will be minimised to the lowest practicable levels including how grey and/or storm water recycling has been incorporated into the design. A water conservation statement must be provided, as part of a design statement or statement of sustainability and will be subject to conditions to ensure the</i></p>

Consultation feedback	Response
	<i>implementation of water conservation and management measures prior to the first occupation and use of the development.'</i>
Some data is inconsistent with the Jersey Building Bye-Laws.	Noted, but no detail provided to suggest where any such inconsistency lies. The draft SPG has been the subject of consultation with I&E (Regulation-building control).
<p>Overall, I am very pleased to see this draft SPG provide a revision to existing guidance and addresses some existing shortcomings. Below are my responses and recommendations.</p> <p><i>Consideration of Plans that Deviate from the minimum standards.</i></p> <p>3.1 Residential space as a material consideration provides a solid footing for the interpretation of the guidance. It is useful that three types of cases are identified in which deviation from the plans can occur. The section requires justification for any deviation from standards. I agree with this but believe further guidance could be given as to what form this justification takes. For example providing a rationale and design evolution of the proposals would provide context and allow a planner to consider the trade-offs considered by the applicant in reaching a plan. Furthermore, in such instances that minimum standards are not met, I believe it would be beneficial that applicants provide an "interior layout/design" brief that would be conditioned to be implemented to ensure the best use of space. Such 'good small design' could include using floor to ceiling cupboards, custom internal partitions and other space saving techniques that a unit which exceeds minimum standards would not have such a requirement to provide.</p> <p>Recommendation 1: Further guidance on justification of exceptional cases should be provided which applicants should follow, that demonstrate why and how the proposals have been arrived at.</p> <p>Recommendation 2: Units that do not meet minimum standards and can be justified as an exception contain an interior design brief that demonstrates how the space has been designed for the best quality of place.</p>	<p>As noted, the guidance already sets out those circumstances where guidance may be applied flexibly to reflect particular circumstances.</p> <p>This is considered to be provide sufficient framing to enable the applicant to set out the basis for any departure from adopted guidance and that no further guidance is either necessary or appropriate.</p> <p>The requirement for and submission of a design statement already provides the applicant with a tool to set out their approach to the design of a scheme and to highlight any specific challenges of a particular site or building; and the design response to them.</p> <p>The guidance further stipulates that any deviation away from adopted residential space standards will need to demonstrate that this would not be detrimental to the health and wellbeing of intended occupants or users of the development and the quality of place. This is considered to be sufficiently targeted and flexible to enable the applicant to demonstrate how the proposed scheme safeguards the health and amenity of future occupants: this may be through the submission of interior details, indicating how key elements of space are to be provided.</p>
4.2.2 All balconies should have solid floors draining to a downpipe. Could more information be provided about this? Is this always possible and how should exceptions be handled?	<p>Change</p> <p>Balconies should be free-draining to avoid standing water. Consideration will be given to more flexible form of wording to allow a range of design responses.</p>
Too dictatorial to require balconies under 6 sqm to have a downpipe. Should be reworded to include MMC free-draining pre-fabricated balconies that don't need downpipes.	See above.
Secondly, the rise in remote and hybrid working has created a need for more space.	<p>Part of the basis for revising the guidance has been around changes in the way we live, including more home working.</p> <p>The guidance states that plans for residential development should demonstrate that all homes are provided with adequate space for home</p>

Consultation feedback	Response
	<p>working or study. A minimum requirement is space to allow a desk, chair and filing cabinet or bookshelf to be satisfactorily accommodated, where there is still space to move around, in a room.</p> <p>The provision of dedicated study areas will be encouraged but to avoid being classed as a bedroom, they should be below 8 sqm.</p>
<p>The fourth paragraph for Space for Work is unclear and needs to be more prescriptive for the requirements of home working and what space should be provided, desks in bedrooms is unsatisfactory if you are trying to improve living standards.</p>	<p>See above.</p>
<p>The Standard outlines the minimum provision for bathrooms, is too low for occupancy for 4 people and above, the Standards as they are written will mean that a unit for 6 people could potentially only be provided with one bathroom and one toilet as ensuite bathrooms are outside of the GIA, thereby the product provided will be inferior to current market provision where en-suites are the norm in modern apartments.</p>	<p>The guidance requires that the minimum gross internal area (GIA) for dwellings provides sufficient space for one bathroom with a toilet in dwellings occupied by between two and four people; and one bathroom with a toilet and one additional toilet in dwellings occupied by five or more people.</p> <p>The guidance does not preclude the provision of further toilets or bathrooms, but these should be provided in addition to the minimum GIA relative to the potential occupancy of the accommodation.</p>
<p>The bathroom standards will increase house prices.</p>	<p>See above.</p>
<p>Too confusing – its either minimum GIA or not. Why add more area for additional bathrooms to already restricted minimum space standards. Just use Table 1.</p>	<p>See above.</p>
<p>Parking provision has been seen as evil whilst alternative transport provision is paid mere lip service.</p> <p>Town residents, particularly children, should be able to access sports and cultural venues across the island.</p>	<p>Standards for the provision of residential parking space are also being revised: see Draft supplementary planning guidance: parking space standards (gov.je)</p>
<p>3.2.1 Add reference to maisonettes or other residential typologies, and elsewhere where just 'houses and flats' are mentioned.</p>	<p>Guidance to be amended to reflect wider range of typologies.</p>
<p>The requirement to provide up to 10% of the site area as shared open space for 5-9 houses will make schemes unviable and/or increase the cost of housing.</p>	<p>The cost of undertaking development is noted.</p> <p>The Minister is revising and issuing guidance that deals with all key aspects of residential development, including density; residential space standards; and residential parking standards.</p> <p>The combined effect of all of this revised guidance should help to promote viability and deliver more and better residential accommodation on development sites.</p> <p>In circumstances where the development of a scheme is considered to be unviable, evidence should be provided in support of a planning application.</p>

Consultation feedback	Response
<p>As-built accommodation scheduled is too onerous and too detailed. How is this policed as the SPG states it should form part of the approved documents.</p> <p>Proposed accommodation scheduled for overall units and areas is more reasonable to be submitted with the application.</p>	<p>It is a minimum requirement that any schedule is completed and submitted with a planning application, to enable the proposal to be easily and comprehensively assessed.</p> <p>Likewise, any changes to a scheme should be captured and recorded in terms of planning permission granted. This is no different to any changes that might be made to plans and drawings associated with a scheme.</p>
<p>Residential development of 50 no. (?) new homes or more should include centralised, below ground refuse storage systems to optimise site efficiency and reduce carbon associated with weekly refuse trips.</p>	<p>Noted. This is an issue outside the scope of this guidance.</p>
<p>Perhaps greater emphasis in this SPG to placemaking, well-being and design quality.</p>	<p>All of these elements are referenced in section 2 of the guidance.</p> <p>Fundamentally, they are policy considerations in their own right under the auspices of the bridging Island Plan, and need to be considered in any event.</p>
<p>Perhaps guidance on restricting unnecessarily large numbers of ensuite bathrooms, which are space-hungry and water resource wasteful?</p>	<p>The guidance sets out the minimum functional and space requirements of a new home. The provision of additional rooms is a matter for the developer, but critically, should not be included as part of the GIA.</p>
<p>Urban greening factor (UGF) improvements should be a requirement of all residential developments.</p>	<p>Proposal 12 – Biodiversity net gain of the bridging Island Plan states that the Minister for the Environment will undertake further studies to determine how the concept of biodiversity net gain and an urban greening factor could be developed and implemented as part of the legal framework in Jersey, and how it could be measured and monitored to ensure its application through the planning process.</p>