

ED16: Explanatory note on access and space standards.

Introduction

In his questions to the Council, the Inspector has raised the following:

“Policy DM42: Accessible and adaptable housing

Proposed changes PC49-51 seek to address the WMS of March 2015 but the optional new national standards in relation to access and space standards should only be required if they address a clearly evidence need and where their impact on viability has been considered. What is the evidence in relation to need and viability for the access and space standards? Has the Council had regard to the PPG on Housing – Optional Technical Standards and paragraphs 007, 008, 009, 018 and 020 in particular?”

This paper is set out in two parts firstly dealing with the accessibility parts of this policy, including references to need and viability, and secondly the space standards. The paragraphs from the PPG referenced above by the Inspector are considered below.

Part 1: Accessible and adaptable housing

Consultation comments summary

There were 11 representations received to this policy. As noted in the Consultation Statement (June 2015), a main objection to this policy is on the grounds of impact on development viability, in addition to:

- the ambiguous nature of the publication version,
- that Building Regulations are overseeing this aspect.

In response to this consultation, the policy was redrafted to emphasis the prerequisite need for evidence required to justify the policy in line with national advice.

Existing policy approach

The Core Strategy currently contains Policy CS2 that includes a requirement for compliance with Lifetime Homes. Since the publication of a ministerial statement setting out the intention to wind down the Code for the Sustainable Homes in addition to the Lifetime Homes, the Council has published SPD indicating that the principle of Lifetime Homes will be encouraged but not required for new homes.

Approach taken in the Sites and Policies Part 1

The requirements set out in DM42 update the existing policy position in relation to Lifetime Homes and are for compliance with Category 2. This is an Optional Standard set out in Approved Document M of the Building Regulations which came

into force on 1 October 2015. To require this optional standard a local policy must be in place within the Local Plan.

The policy as drafted recognises the requirement for evidence of need to justify the policy and to take viability into account. This is comparable to other policies in the DPD such as for retirement homes.

Fitting in with Building Regulation changes.

The Building Regulations were amended in October 2015. It is necessary to align this policy to those changes in order to help support a transition into the policy.

Evidence required

Need

The Planning Practice Guidance provides a useful steer on the evidence of need required to justify any requirements for accessible housing. The Strategic Housing Market Assessment (SHMA) should provide some information focussing on demographic information. The guidance makes clear that there is not one source of evidence for this and that it is for local authorities to decide upon the approach to evidencing need.

SHMA and the Joint Strategic Needs Assessment

Volume 1 of the SHMA (July 2015) provides an indication of the level of need arising from 'older people'. This is calculated to be 4,484 persons growth in the 'institutional population' (2016 to 2026) requiring specialist accommodation. This calculates to a need for 224.4 persons per year. However with the increasing policy to care for people in their own homes for longer, the needs of this population may have to be increasingly met within the general housing market. From this sector of the demographic alone, a demand of 225 accessible dwellings can be argued per year.

The Joint Strategic Needs Assessment - Housing chapter identifies that there is an increasing demand for home adaptations to be made to enable people to live in their homes and to meet their needs. "Over 200 households have benefited from major adaptations through Disabled Facilities Grants in 2013/14 at a cost of over £1m. Demand for adaptations has increased significantly in recent years, which places a considerable pressure on the limited resources available to fund this work." This suggests that 200 households does not represent the full need as these are only homes that have secured grants.

Disabled households in North Somerset

In England as a whole, 29.8% of 'households were recorded as households with reference to a person with long term illness or disability'¹. For North Somerset the comparable percentage of households is 33.4% based on Census 2011 data indicating North Somerset to have an increased prevalence of disabled households

¹ DCLG, (March 2015), *Guide to Available Disability Data*

Seymour, St Georges, and Wick St Lawrence. Arguably there is a case to tailor the requirement for Category 2 accessible housing to broadly align with the age profile although this may place too much emphasis of needs being related to the elderly population.

Drawing conclusions from the evidence of need

The need for accessible housing is driven by different groups in society, and the needs are likely to vary across the centres of population. Setting a single threshold and quantum for provision across North Somerset is therefore not likely to reflect the evidence of need.

The evidence suggests that needs for accessible housing are likely to increase as people live longer and models of care seek to allow people to stay in their own homes longer. The policy needs to reflect this too.

Viability

National guidance requires that the cost of compliance with the policy has to be understood when setting the specific requirements of the policy to ensure it does not render development unviable. In a report commissioned by the Department for Communities and Local Government published in September 2014 the cost of meeting Category 2 was estimated to be £520 to £940 per dwelling. This compares to the cost of compliance with Lifetime Homes of between £1,082 and £1,100. This indicates that the cost burden of policy is actually being reduced in this policy area compared to previous policy.

Preferred approach to implementing the policy:

Policy is as drafted in the submitted plan and supporting Proposed Modifications. The Council will collate and keep up-to-date evidence related to the levels of need across North Somerset. When assessing an application, based on the wider material issues of the scheme specifically viability and feasibility, the developer will be required to make provision for the need within the development as identified by the developer (as required through the Validation Checklist) with reference to evidence of need.

To support this process guidance will be provided explaining what evidence can be submitted, how different scales of residential development will be expected to comply, the approach to calculating need and actual provision within a scheme and some general principles for inclusion of accessible housing within developments.

There may be a role for S106 contributions in lieu of actual provision of accessible housing, or in addition to. Depending on meeting the statutory regulations and there being suitable avenue for using funds, this could provide flexibility and choice in delivering the policy objective of securing accessible housing.

Given the changing needs over time and the changing needs across different areas a 'one size fits all' policy with stated thresholds is unlikely to be effective for all schemes and areas.

Part 2: Space Standards

On 27 March 2015 the government announced a new approach to the setting of technical housing standards in England. In response the written ministerial statement which outlined the policy on the application of these technical standards for plan making, the council included an additional sentence into Policy DM42 as a proposed modification with the submission of the Sites and Policies Plan Part 1 in July 2015.

The WMS states that optional space standards can only be applied where there is a local plan policy based on evidence local need and where the viability of the development is not compromised.

Evidence of local need:

Paragraph 020 of the Planning Practice Guidance states that *“evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes”*.

Table 1 below show the number of properties by type (in terms of flats and houses) and size (in terms of number of bedrooms) that were built in North Somerset between 2010 and 2015.

Table 1: Residential completions by type 2010-2015

HOUSES	Number	%	FLATS	Number	%
1 bed house	38	1.2%	1 bed flats	399	12.3%
2 bed house	452	14.0%			
3 bed house	784	24.2%	2 bed flats	953	29.4%
4 bed house	489	15.1%			
5+ bed house	54	1.7%	3+ bed flats	59	1.8%
Residential caravans	11	0.3%			
TOTAL NUMBER OF HOUSES	1828	56.4%	TOTAL NUMBER OF FLATS	1411	43.6%

The table shows that two bedroom flats (29.4%) and three bedroom houses (24.2%) were the most common type of property type built over the last 5 years.

In terms of projected housing size and tenure the table below identifies that, over the wider Bristol area, housing need for market housing comprises almost 10,000 additional flats and just over 46,000 additional houses; mainly three bedroom properties, but with a need identified for 7,300 houses with two bedrooms and 7,700 houses with four or more bedrooms. Housing need for affordable housing comprises

11,600 flats (split relatively evenly between one bedroom flats and flats with two or more bedrooms) and 17,500 houses (4,900 houses with two bedrooms, almost 10,000 houses with three bedrooms and 2,700 houses with four or more bedrooms).

Table 2: Projected housing type and size (Draft SHMA Vol II).

		Housing Need		Net Change 2016-36	Impact of OAN Uplift	TOTAL CHANGE 2016-36
		2016	2036			
MARKET HOUSING						
Flat	1 bedroom	27,900	31,300	3,400	100	3,500
	2+ bedrooms	43,200	49,000	5,800	400	6,300
House	2 bedrooms	46,400	53,000	6,700	600	7,300
	3 bedrooms	176,900	205,700	28,800	2,500	31,200
	4 bedrooms	56,900	63,200	6,200	600	6,900
	5+ bedrooms	8,900	9,600	700	100	800
Total Market Housing		354,700	406,300	51,600	4,400	55,900
AFFORDABLE HOUSING						
Flat	1 bedroom	15,200	20,600	5,400	600	6,100
	2+ bedrooms	14,000	19,100	5,100	500	5,500
House	2 bedrooms	9,500	14,100	4,600	300	4,900
	3 bedrooms	17,400	26,600	9,200	700	9,900
	4+ bedrooms	1,900	4,500	2,600	100	2,700
Total Affordable Housing		58,000	84,900	26,900	2,100	29,100
TOTAL		412,700	491,200	78,500	6,500	85,000

Although the table does not breakdown the figures to North Somerset level it gives a useful indication of household projection within the wider area.

These figures provide evidence of the size and type of dwellings being built in the area and the projected need of the size and type of dwelling.

Viability.

To assess viability the council has compared the size of our current minimum size requirement for affordable homes as set out in the Affordable Housing SPD against the nationally described space standard, and compared the size of market housing in recent large and small scale developments against the nationally described space standard

Table 3: Nationally described space standard

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) ²			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

Firstly in comparing the size of the nationally described space standard and the North Somerset Affordable Housing SPD requirements the standards are comparable.

Table 4: North Somerset Affordable housing SPD (Nov 2013) size standards.

Unit Type	Minimum Net Internal Floor Area
1 bed flat	46m ²
2 bed flat	61m ²
2 bed house/bungalow	76m ²
3 bed house/bungalow	86m ²
4 bed house	110m ²
Anything larger than 4 beds	110m ² + 10m ² per person/bedspace

Table 5 below shows a comparison. The Affordable Housing SPD does not breakdown the requirements into number of people or number of storeys so to achieve a comparison an average of the nationally described space standard has been used for each property type based on a two storey property.

Table 5: Comparison of dwelling size between Affordable Housing SPD requirements and nationally described space standards

Number of Bedrooms	Affordable Housing SPD	Nationally Described Space Standards
1 bed flat	46m ²	44.5m ²
2 bed flat	61m ²	61m ²
2 bed house	76m ²	74.5m ²
3 bed house	86m ²	93m ²
4 bed house	110m ²	110m ²

Since the adoption of the Affordable Housing SPD in November 2013 the council have been requiring the equivalent of the nationally described space standards for affordable housing schemes.

We have profiled 212 dwellings across ten sites geographically spread across the district. The results are set out in Table 6. Green marks those units that meet or exceed the nationally described space standards and red shows those that are below. These have been measured on approved plans on completed sites.

The affordable housing sites are shown highlighted in grey. The table shows that, assuming the houses have been built to the size stated in the plan, 61% of affordable housing schemes are being delivered to the standards required in the SPD, which are comparable with the nationally described space standards.

Furthermore, evidence shows that affordable housing schemes which were approved prior to the adoption of the SPD were already being built to the standards required in the SPD.

For the larger sites at Weston Villages (see Tables 7 and 8) all of the affordable housing met or exceeded the nationally described space standards.

In terms of market house we have analysed the house sizes of completed large scale developments at Weston Villages as well as smaller scale (10-50 units) developments across the district. Table 6 shows that for smaller sites within our sample 100% of market housing is already meeting or exceeding the nationally described space standards.

Table 6: District wide house size analysis for smaller sites (10-50 units).

Year approved	Location	Area	1 s 1b 2p	1 s 2b 3p	1 s 2b 4p	2 s 2b 3p	2 s 2b 4p	2 s 3b 4p	2 s 3b 5p	2 s 3b 6p	2 s 4b 6p	2 s 4b 8p	3 s 3b 5p	3 s 3b 6p
			50	61	70	70	79	84	93	102	106	124	99	108
28/02/2011	Old sorting office 1 x plot	Weston									114			
28/02/2011	Old sorting office 12 x plots	Weston							95					
28/02/2011	Old sorting office 21 x plots	Weston					76							
28/02/2011	Old sorting office plot 9 x plots	Weston		57										
28/02/2011	Old sorting office 3 x plots	Weston									121			
28/02/2011	Old sorting office 3 x plots	Weston			57									
28/02/2011	Old sorting office 2 x plots	Weston							93					
07/02/2012	The Bell Inn 2 x plots	Congresbury					93							
07/02/2012	The Bell Inn 2 x plots	Congresbury								112				
07/02/2012	The Bell Inn 2 x plots	Congresbury								106				
07/02/2012	The Bell Inn 2 x plots	Congresbury					89							
07/02/2012	The Bell Inn 2 x plots	Congresbury						95						
19/04/2013	Warren Lane 3 x plots	Long Ashton								120				
19/04/2013	Warren Lane 4 x plots	Long Ashton								112				
19/04/2013	Warren Lane 5 x plots	Long Ashton								114				
14/07/2011	Strode Road 9 x plots	Clevedon												120
14/07/2011	Strode Road 1 x plot	Clevedon	68											
14/07/2011	Strode Road 2 x plots	Clevedon		68										
14/07/2011	Strode Road 2 x plots	Clevedon		65										
08/09/2010	Live & Let Live 5 x plots	Blagdon				76								
08/09/2010	Live & Let Live 4 x plots	Blagdon						86						
08/09/2010	Live & Let Live 4 x plots	Blagdon		65										
09/06/2011	Brook House 3 x plots	Wrington								120				
09/06/2011	Brook House 1 x plot	Wrington							115					
09/06/2011	Brook House 1 x plot	Wrington							111					
09/06/2011	Brook House 2 x plots	Wrington							116					
09/06/2011	Brook House 2 x plots	Wrington								122				
09/06/2011	Brook House 2 x plots	Wrington							117					
13/04/2007	Church Road 1 x plot	Winford								123				
13/04/2007	Church Road 1 x plot	Winford								130				
13/04/2007	Church Road 2 x plot	Winford								135				
13/04/2007	Church Road 1 x plot	Winford				70								
13/04/2007	Church Road 1 x plot	Winford				75								
13/04/2007	Church Road 1 x plot	Winford					79							
13/04/2007	Church Road 1 x plot	Winford									157			
13/04/2007	Church Road 3 x plots	Winford							110					
01/12/2014	Wolershill Road 5 x plots	Weston											99	
01/12/2014	Wolershill Road 3 x plot	Weston						84						
01/12/2014	Wolershill Road 2 x plots	Weston				77								
01/12/2014	Wolershill Road 1 x plot	Weston							93					
01/12/2014	Wolershill Road 2 x plots	Weston				71								
01/12/2014	Wolershill Road 2 x plots	Weston				59								
12/02/2013	Mendip Road 2 x plots	Weston		59										
12/02/2013	Mendip Road 5 x plots	Weston		62										
12/02/2013	Mendip Road 8 x plots	Weston				75								
12/02/2013	Mendip Road 13 x plots	Weston							95					
12/02/2013	Mendip Road 20 x plots	Weston							95					
12/02/2013	Mendip Road 17 x plots	Weston								108				
21/09/2012	59-61 High Street 10 x plots	Yatton		63										

For the large sites at Weston Villages (see tables 7 and 8 below) the average size of properties generally exceeds the national described space standard requirement. The 2 bed private dwellings on both schemes are smaller than the nationally described space standard average which was based on a two storey property. On the Weston Airfield site the three private bedroom properties were also fell slightly short of the nationally described space standards. If using the nationally described space standards for a two bed single storey property the dwelling sizes for a 2 bed private unit would still fall short of the space standard, but by a lesser margin.

Table 7: Weston Airfield – Average house size

	House type	No. of units	Average size (sqm)	Nationally described space standard (average)	
Phase 1	1 bed private	0	-	44.5m2	
	2 bed private	79	60	74.5m2	
	3 bed private	396	89	93m2	
	4 bed private	317	134	110m2	
	1 bed affordable	0	-	44.5m2	
	2 bed affordable	63	76	74.5m2	
	3 bed affordable	35	93	93m2	
	4 bed affordable	10	123	110m2	
	<i>Sub-total</i>		900	102	
	<i>Sub-total - affordable only</i>		108	86	
	<i>Sub-total - market only</i>		792	104	

Table 8: Locking Parklands – Average house size

	House type	No. of units	Average size (sqm)	Nationally described space standard	
Phase 1	1 bed private	2	50	44.5m2	
	2 bed private	12	69	74.5m2	
	3 bed private	34	106	93m2	
	4 bed private	22	145	110m2	
	1 bed affordable	2	50	44.5m2	
	2 bed affordable	13	77	74.5m2	
	3 bed affordable	12	93	93m2	
	4 bed affordable	3	130	110m2	
	<i>Sub-total</i>		100	103	
	<i>Sub-total - affordable only</i>		30	87	
	<i>Sub-total - market only</i>		70	110	

Conclusion

The above analysis shows that properties are already being built and delivered to the size required by the nationally described space standards. This would indicate that the building to these standards does not impact on the viability of schemes.