

Tewkesbury Borough Plan 2011-2031

Preferred Options Consultation

Housing Standards Background Paper

September 2018

1. Introduction

1.1 In March 2015 the Government published a number of optional technical standards for housing. These include optional Building Regulations for accessible and adaptable dwellings and wheelchair user or wheelchair adaptable dwellings, and new national space standards. These optional standards can only be secured through planning policies within an adopted Development Plan.

1.2 'Approved Document M' Volume 1¹ sets out the Building Regulations for the access to and use of dwellings and includes the two new optional categories:

- M4(2) – Accessible and Adaptable dwellings
- M4(3) – Wheelchair User Dwellings

1.3 Category 2 (M4(2)) Accessible and Adaptable Dwellings requires dwellings to meet the needs of occupants with differing needs, including some older or disabled people, and to allow adaptation of the dwelling to meet the changing needs of occupants over time. This category is broadly equivalent to the Lifetimes Homes standard.

1.4 Category 3 (M4(3)) Wheelchair User Dwellings requires dwellings to meet the needs of occupants who use wheelchairs or to allow simple adaptation to meet the needs of occupants who use wheelchairs.

1.5 The national space standards are referred to as 'nationally described space standards' (NDSS) and are set out in set out in 'Technical housing standards – nationally described space standard' (DCLG, March 2015)². Table 1 within this document sets out the minimum gross internal floor areas and storage space required under the standards. A copy of Table 1 is set out below:

¹ https://www.planningportal.co.uk/info/200135/approved_documents/80/part_m_-_access_to_and_use_of_buildings

²

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf

Table 1 - Minimum gross internal floor areas and storage (m²)

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) *			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	

Source: 'Technical housing standards – nationally described space standard' (DCLG, March 2015)

1.6 Due to its ageing population and an evidenced need for internal space standards within the borough, the Council intends to provide policies within the Tewkesbury Borough Plan to make the optional technical standards described above a mandatory requirement for new housing developments. However, to do this the Planning Practice Guidance (PPG) advises that Local Planning Authorities must demonstrate a need for the standards, define what proportion of new dwellings should comply with the standards (for accessible and adaptable dwellings and wheelchair user dwellings), and the impact of adopting the standards on development viability (for internal space standards).

1.7 This background paper will provide the necessary evidence to enable the Council to adopt the standards within the Tewkesbury Borough Plan.

2. Planning policy context

2.1 The NPPF's advice on achieving well designed places (section 12) states that planning policies and decisions should (inter alia) create places that are safe, inclusive and accessible and which

promote health and well-being, with a high standard of amenity for existing and future users (paragraph 127). The NPPF also advises that (when planning for housing), the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes (paragraph 61).

2.2 With regard to adaptable and accessible housing the PPG states that based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:

- the likely future need for housing for older and disabled people (including wheelchair user dwellings).
- size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).
- the accessibility and adaptability of existing housing stock.
- how needs vary across different housing tenures.
- the overall impact on viability.

2.3 The PPG makes it clear that, where a local planning authority adopts a policy to provide enhanced accessibility or adaptability, they should do so only by reference to Requirement M4(2) and/or M4(3) of the optional requirements in the Building Regulations.

2.4 With regard to internal space standards, the PPG advises that, where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- need – 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.
- viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.

2.5 The PPG makes it clear that, where a local planning authority (or qualifying body) wishes to require an internal space standard, they should only do so by reference in their Local Plan to the nationally described space standard.

2.6 At a local level there is strategic and policy support in the JCS for adopting the technical standards for accessible and adaptable dwellings and internal space. Strategic Objective 8 of the Joint Core Strategy (Delivering a wide choice of quality homes) is to deliver good-quality new housing to meet the needs of the current and future population and ensure greater affordability for all sectors of the community by (inter alia) delivering housing of the right size, type and tenure to ensure the creation of mixed communities located in sustainable locations with good access to jobs and services.

2.7 This objective is to be achieved by Policy SD11 of the JCS which states that new housing should meet and where possible exceed appropriate minimum space standards; and that housing should be designed to be accessible and adaptable as far as is compatible with the local context and other policies.

2.8 Furthermore, the vision of the Tewkesbury Borough Plan should be noted:

“Tewkesbury borough, a place where a good quality of life is open to all, where our environment and heritage assets are cherished, and where a thriving economy supports healthy and happy communities.”

3. Accessible and adaptable dwellings/wheelchair user dwellings

- 3.1 To investigate whether there is a need for the optional building regulations within Tewkesbury Borough, regard has been paid to the Strategic Housing Market Assessment update³ (HDH Planning and Development, 2015) (hereinafter referred to as the SHMA update). This finds that, within the JCS area, Tewkesbury records the largest proportion of older person only households (households where all members are 65 or over) at 24.9%. This is compared to 21.3% in the JCS area and 20.5% nationally (p25).
- 3.2 The objectively assessed need projections within the SHMA update indicate that the population aged 65 or over within the JCS area is going to increase dramatically over the remainder of the plan period from 60,897 in 2015 to 87,745 in 2031 (p36), an increase of 26,848 people which equates to 47% of the overall expected growth during that period.
- 3.3 The number of older household reference persons is also projected to grow quite notably; with the number of household reference persons aged 85 or over within the JCS area expected to increase by over 75% by 2031 (SHMA update, p14). The SHMA update reveals a strong correlation between age and long-term health problems or disability, with some 74% of those aged 80 or over in JCS area have a long term health problem or disability (Figure 4.2). Furthermore, some 16.1% of the resident population overall in the JCS area have a long-term health problem or disability (SHMA update, p38).
- 3.4 Given the dramatic growth in the older population and the higher levels of disability and health problems amongst older people there is likely to be an increased requirement for specialist accommodation options moving forward. The Council recognises that adaptable and wheelchair accessible homes are an important function of the housing market as they reduce the demand for specialist housing by allowing residents to remain in their own home for longer. The national trend is for more and more elderly and disabled residents to stay in their own home, rather than live in a residential institution or retirement homes. For many vulnerable older people, having the chance to avoid residential care and live in specially designed housing as tenants or owner-occupiers is an important element in retaining independence and dignity in older age. Many such individuals can be cared for in their own homes, particularly with the development of assistive

³ EXAM118 - <https://jointcorestrategy.org/examination-documents-105-125>

technology (telecare and telemedicine), use of appropriate aids or adaptations to the dwelling, and new models of housing related care and/or support services.

- 3.5 It is considered that the provision of adaptable dwellings will make a valuable contribution towards meeting the future needs of the elderly or those with disabilities, enabling them to stay in their own home if desired. As a result, there needs to be an increase in the overall percentage of new homes built over the plan period that will be required to meet adaptable and accessible standards.
- 3.6 Evidence from the SHMA update demonstrates that, based on the projected population growth of people in the 65 or over category being 47% of the overall growth, and given the strong correlation between age and long-term health problems or disability, it is necessary to require that developments provide a minimum of 50% of the dwellings to Building Regulations Requirement M4(2): Category 2 – Accessible and Adaptable Dwellings.
- 3.7 Whilst the housing needs of wheelchair users in the JCS area over the remainder of the plan period are less clearly defined in the Council’s evidence base, the English Housing Survey 2011 to 2012 household report⁴ shows that 3.3% of the sample population in England are households with one or more wheelchair users. It is necessary therefore to require that housing schemes provide a proportion of dwellings to Building Regulations Requirement M4(3): Category 3 – Wheelchair User Dwellings. The exact proportion of dwellings built to this standard should however be informed by locally specific evidence including any updates to the SHMA published after the adoption of this plan, evidence in Parish Surveys and local evidence provided to support Neighbourhood Plans.
- 3.8 Planning Practice Guidance states that a policy requiring wheelchair accessible dwellings should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. Therefore, the Council should only negotiate a proportion of wheelchair accessible dwellings on sites proposing 10 or more additional dwellings on the basis that such proposals are required to provide affordable housing.

⁴ As referenced in ‘Guide to available disability data’ (DCLG, March 2015)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/416475/150323_Guide_to_disability_data_final_web_version.pdf

4. Nationally described space standards

- 4.1 To investigate whether there is a need for internal space standards in the borough, research has been carried out into a selection of eight major housing developments permitted since the NDSS were introduced in March 2015. A range of sites were selected involving different housebuilders in both urban and rural locations across the Borough. Applications were only selected where information on the Gross Internal Area (GIA) of the different house types was readily available. The internal areas used for this assessment are those indicated in the application submission rather than the Council's own measurements.
- 4.2 The table at Appendix 1 presents the results of the research and shows that, on average, approximately 44% of the dwellings across the sites surveyed were below the NDSS. The house types surveyed ranged from between 1m² up to 20m² below the NDSS. To put this into perspective reference is made to the RIBA 2011 report 'The Case for Space: the size of England's new homes'⁵. This demonstrates how seemingly small increases in floor area can have big impacts in lifestyle terms. For example it highlights that 4m² is the equivalent of a single bed, a bedside table and a dressing table with a stool. It is the space that allows you to work at home at the computer in the day and also have an extra sofa when you've got friends round in the evening. 8m² is the equivalent of a single bedroom and the furniture you'd expect to fit comfortably within it (p5).
- 4.3 The RIBA report goes on to highlight how substandard space in homes can have adverse social impacts. It refers to a review of existing research which suggests that the space in homes can affect the educational outcomes of children, public health costs, individual wellbeing and interpersonal interactions and relationships (p13).
- 4.4 The Council considers it to be essential in the interests of the quality of life and social well-being of its residents that all new dwellings in the borough are provided to the NDSS as a minimum.

⁵ <https://www.architecture.com/-/media/gathercontent/space-standards-for-homes/additional-documents/ribacaseforspace2011pdf.pdf>

5. Proposed policy approach

5.1 To meet the needs evidenced within this paper, the following policies are proposed within the preferred options Tewkesbury Borough Plan:

Policy RES15 Accessible and Adaptable Homes

In order to ensure delivery of new homes that are readily accessible and adaptable to meet the changing needs of occupants, and to support independent living, the Council will require that:

1. In all proposals a minimum of 50% of the dwellings should meet the Building Regulations Requirement M4(2): Category 2 – Accessible and Adaptable Dwellings; and
2. where a local need has been identified based on the most up to date evidence of housing need, including the Strategic Housing Market Assessment, Parish Surveys and local evidence provided to support Neighbourhood Plans, a proportion of the dwellings on sites proposing 11 or more gross additional dwellings will be expected to meet the Building Regulations Requirement M4(3): Category 3 – Wheelchair User Dwellings.

Policy DES1 Housing Space Standards

Tewkesbury Borough Council adopts the Government’s nationally described space standards. All new residential development will be expected to meet these standards as a minimum.

New residential development will be expected to make adequate provision for private outdoor amenity space appropriate to the size and potential occupancy of the dwellings proposed.

6. Viability

6.1 To demonstrate the impact of adopting the NDSS on the viability of development in Tewkesbury Borough, the Council has had regard to the Plan viability, Community Infrastructure Levy and affordable housing study prepared for the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy⁶ (Peter Brett Associates, January 2016) (hereinafter referred to as the ‘Viability Study’).

⁶ EXAM176 <https://jointcorestrategy.org/examination-documents-166-199>

The Viability Study was prepared for the purpose of demonstrating that the requirements of the NPPF and the policy requirements in the strategic plan (for example affordable housing) do not threaten the development viability of the plan as a whole. It is however of relevance to this matter as its assumptions are based on unit sizes that are similar to the NDSS. The following unit sizes are used in the Viability Study:

Table 2 – Unit sizes used in Viability Study

Unit type	Size (sq m)
Flats (NIA)	56.3
Flats (GIA)	64.7
2 bed house	76.5
3 bed house	95.5
4+ bed house	120.6

Source: Table D1.1 from 'Plan viability, Community Infrastructure Levy and affordable housing study prepared for the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (Peter Brett Associates, January 2016)'

6.2 It can be observed that the tested unit size for flats (64.7m² GIA) is larger than all of the 1 bed unit types in the NDSS and also larger than the 2B3p1SD unit type (which from the sites analysis appears to be a popular unit type for flats). The 2 bed tested unit size is larger than most of the 2 bed unit types in the NDSS. The 3 bed tested unit size is larger than most of the 3 bed units in the NDSS including the 3B5p2SD which appears to be the most popular from the sites analysis. It is however smaller than the 3B6p2SD and 3B6p3SD unit types in the NDSS, although from the sites analysis these appear to be less common. The 4 bed tested unit size is larger than what appears from the site analysis to be the most common 4 bed house types (4B6p2SD and 4B7p2SD). It is however smaller than the 4B8p2SD and 4B8p3SD unit types, although the site analysis shows that these are already being provided at sizes above the NDSS.

- 6.3 On the above basis, the Viability Study is considered to be valid evidence for this purpose. The Viability Study finds that, based on the unit sizes at Table 2 above, development in Tewkesbury is viable with a large headroom and significant scope for CIL. From this, it can be concluded that adopting the NDSS will not adversely affect the viability of development within the Borough.
- 6.4 The PPG advice on the NDSS also advises that account should be taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted. To assist with this matter reference is made to research carried out by the Greater London Authority⁷ whereby an investigation was carried out into whether increasing the size of new homes would lead to lack of affordability within the housing market when it proposed new minimum space standards in its draft London Housing Design Guide. Would it still be viable for developers to deliver new homes, would a 10% increase in size lead to a 10% increase in costs for the developer or purchaser, or would it lead to fewer homes being built if they each take up more space on a site? Detailed research analysed eight example schemes to assess the cost and delivery impact of the new standards. The new minimum floor areas did not impact on the number of homes being delivered. The report suggested that by working with designers it was expected that the developer would be able to avoid reducing the number of homes. Increases in building costs due to the space standards ranged from 10% to 1%, but the report concluded that the London Housing Design Guide would, in the majority of cases, have little impact on the number of homes delivered, and the additional building costs would also reduce by 2013 (RIBA Case for Space report, 2011).
- 6.5 The research summarised above was carried out in relation to the space standards within the London Housing Design Guide Interim Edition⁸ (Design for London, 2010). These are however either identical to, or slightly larger than, the NDSS. The research summarised above is therefore considered to be of relevance.
- 6.6 With regard to the impact of the optional Building Regulations on the viability of development in the Borough it can be identified that the majority of the developments surveyed at Appendix 1 have already been designed in their entirety to Lifetime Homes standard which is broadly

⁷ *Draft London Housing Design Guide: Cost and Delivery Impact Assessment Pre Publication Draft*. (Homes and Communities Agency, London Development Agency and Greater London Authority, March 2010), page 28; referenced within 'The Case for Space: the size of England's new homes' (RIBA, 2011), page 16

⁸ https://www.london.gov.uk/sites/default/files/interim_london_housing_design_guide.pdf

equivalent to Requirement M4(2) (accessible and adaptable dwellings). It is not therefore considered that the proposed policy approach would place an onerous or unreasonable financial burden on developers. Likewise, it is common practice for the Council to require that a proportion of affordable housing units are designed to enable wheelchair access where a local need exists. It is not therefore considered that the proposed policy approach would place an onerous or unreasonable financial burden on developers.

7. Conclusion

- 7.1 The evidence within this paper demonstrates that there is a need for the NDSS and optional Building Regulations requirements M4(2) and M4(3) within Tewkesbury Borough. Strategic Objective 8 of the Joint Core Strategy (Delivering a wide choice of quality homes) is to deliver good-quality new housing to meet the needs of the current and future population and ensure greater affordability for all sectors of the community by (inter alia) delivering housing of the right size, type and tenure to ensure the creation of mixed communities located in sustainable locations with good access to jobs and services. If the standards are not adopted it is likely that housing will continue to be provided at sizes below the national standard. This would harm the Council's ability to achieve this strategic objective and to achieve the vision of the Tewkesbury Borough Plan to be a borough where a good quality of life is open to all.
- 7.2 The JCS Viability Study and research carried out elsewhere demonstrates that adopting the optional standards should not adversely affect the viability of development.
- 7.3 On this basis, the Council considers that policies RES15 and DES1 within the preferred options Tewkesbury Borough Plan are justified and consistent with national guidance.

APPENDIX 1

APPENDIX 1 - Analysis of housing developments permitted since introduction of NDSS

No. of bedrooms	Variation	Nationally Described Space Standard (m2)	Homelands 2 Phase 3B (52 dwellings) (15/00449/APP) (m2)	Homelands 2 Phase 2 (127 dwellings) (15/00575/APP) (m2)	Homelands 2 Phase 3c (113 dwellings) (16/00739/APP) (m2)	Cleavelands Phases 4 and 5 (234 dwellings) (16/00227/APP) (m2)	Land to West of Lassington Lane, Highnam (88 dwellings) (16/00858/APP) (m2)	Land at Banady Lane, Stoke Orchard 45 dwellings (15/00352/APP) (m2)	Parcel 5b Gloucester Business Park 31 dwellings (15/00816/APP) (m2)	Land west of Bredon Road, Tewkesbury (68 dwellings) (16/00663/APP) (m2)
1 bed	1b1p1SD	39								
	1b2p1SD	50	46-53	50	46-53	50	50-56	55-61	50	53-56
	1b2p2SD	58								
2 bed	2b3p1SD	61		78	81			60		
	2b3p2SD	70				65				
	2b4p1SD	70								
	2b4p2SD	79	78	78	78	73, 63-91	71	71	76	76
3 bed	3b4p1SD	74		93						
	3b4p2SD	84				79		89	86	
	3b4p3SD	90								
	3b5p1SD	86								
	3b5p2SD	93	90	82, 86, 87, 96	90, 97, 123	83, 88-110	76, 89, 88, 93	90, 90, 98	79-91	76-88, 85
	3b5p3SD	99							111	
	3b6p1SD	95								
	3b6p2SD	102								
3b6p3SD	108	101			105					
4 bed	4b5p1SD	90								
	4b5p2SD	97								
	4b5p3SD	103								
	4b6p1SD	99								
	4b6p2SD	106	110-132	95, 102-125	108, 131		110	118		107, 110
	4b6p3SD	112				102, 165				
	4b7p1SD	108								
	4b7p2SD	115	130	111	145-171		126	147-155		124
	4b7p3SD	121							111	
	4b8p1SD	117								
4b8p2SD	124	141-168		147-168	131-143		222		143-161	
4b8p3SD	130					183				
5 bed	5b6p1SD	103								
	5b6p2SD	110								
	5b6p3SD	116								
	5b7p1SD	112								
	5b7p2SD	119								
	5b7p3SD	125								
	5b8p1SD	121								
	5b8p2SD	128		163-185*				181		
5b8p3SD	134			126, 170-210*		200				
6 bed	6b7p1SD	116								
	6b7p2SD	123								
	6b7p3SD	129								
	6b8p1SD	125								
	6b8p2SD	132		125						
	6b8p3SD	138								
No. of dwellings within development falling below NDSS			22/52 (42%)	82/127 (65%)	36/113 (32%)	106/234 (45%)	30/88 (34%)	14/45 (31%)	18/31 (58%)	24/68 (35%)
Amount below NDSS (range)			1-7m2	1-11m2	1-8m2	5-10m2	7-17m2	1-8m2	3-14m2	3-17m2

Notes: * 1SD: 1 storey dwelling. 2SD: 2 storey dwelling. 3SD: 3 storey dwelling. All areas rounded. * These are for 5 bedroom 9 and 10 person dwellings.