

**Pre-submission
Tewkesbury Borough Plan
2011-2031**

Space Standards Background Paper

October 2019

1. Introduction

1.1 In March 2015 the Government published new national space standards. These optional standards can only be secured through planning policies within an adopted Development Plan.

1.2 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)¹. Table 1 within the 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:

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)

- 1.3 Due to an evidenced need for internal space standards within the borough the Council intends to provide policy within the Tewkesbury Borough Plan to make the standards described 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 and assess the impact of adopting the standards on development viability.
- 1.4 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 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.

2.3 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.

2.4 At a local level there is strategic and policy support in the JCS for adopting internal space standards. 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.

2.5 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.

2.6 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. The need for internal space standards

3.1 To investigate whether there is a need for internal space standards in the borough, research has been carried out into a selection of fifteen 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.

3.2 The table at Appendix 1 presents the results of the research. All but one of the 15 sites surveyed involved a proportion of dwellings falling below the NDSS. Out of a total of 1929 dwellings, 790 or 41% were below the NDSS. The house types surveyed ranged from between 1m² up to 17m² 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'². 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).

3.3 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).

3.4 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.

² <https://www.architecture.com/-/media/gathercontent/space-standards-for-homes/additional-documents/ribaseforspace2011.pdf.pdf>

4. Proposed policy approach

4.1 To meet the needs evidenced within this paper, the following policy is proposed within the Pre-submission Tewkesbury Borough Plan:

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.

5. Viability

5.1 To demonstrate the impact of adopting the NDSS on the viability of development in Tewkesbury Borough, the Council has commissioned Porter Planning Economics Ltd (PorterPE) with Three Dragons to carry out a whole plan economic viability assessment (Tewkesbury Borough Plan Viability Assessment, September 2019). This provides robust evidence that the cumulative planning policy requirements within the plan do not threaten the development viability of the Tewkesbury Borough Plan as a whole. The development assumptions used within the viability assessment include the NDSS. The viability assessment therefore considers whether housing developments in the borough designed to meet the NDSS will be able to provide CIL/S106 contributions and achieve all of the Development Plan's other planning policy requirements and remain viable.

5.2 The viability assessment finds that the majority of the tested typologies (designed to the NDSS) would be able to come forward under the cumulative full policy requirements of the JCS and Pre-submission TBP (including CIL and S106). This includes the majority of the housing site allocations in the Pre-submission TBP and windfall developments on greenfield sites in the high and mid value areas. There will be a number of site typologies that are likely to be less able to afford the additional policies within the Pre-submission TBP without being placed at risk of non-delivery. These relate mainly to developments in the lower value areas of the Borough. These do however represent a minority of cases and it is important to note that there is sufficient flexibility within the wording of the respective policies within the Pre-submission TBP, and also the JCS through Policy INF7, to enable a departure from policy where viability presents as an issue through a site specific viability assessment. On this basis it can be concluded that adopting the NDSS through Policy DES1 would not have an adverse impact on development viability in Tewkesbury Borough and act as a hindrance to delivery.

5.3 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 Authority³ 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,

³ *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

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).

- 5.4 The research summarised above was carried out in relation to the space standards within the London Housing Design Guide Interim Edition⁴ (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. Conclusion

- 6.1 The evidence within this paper demonstrates that there is a need for the NDSS 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.
- 6.2 The Tewkesbury Borough Plan Viability Assessment demonstrates that adopting the NDSS should not adversely affect the viability of development.
- 6.3 On this basis, the Council considers that Policy DES1 within the Pre-submission Tewkesbury Borough Plan is justified and consistent with national guidance.

⁴ https://www.london.gov.uk/sites/default/files/interim_london_housing_design_guide.pdf

APPENDIX 1

Nationally Described Space Standard			Site Details														
			Adjacent 74 Evesham Road Bishops Cleeve	Phases 2 & 5, Land at Perrybrook North Brockworth	Land East of Tewkesbury Road and North of Longford Lane Longford	Land off A46 Pamington Lane Pamington Tewkesbury	Land off Nup End Ashleworth	Land North of Innsworth Lane, Innsworth	Phase 3, Land at Perrybrook North Brockworth South of A417	Homelands 2 Phase 3B	Homelands 2 Phase 2	Homelands 2 Phase 3c	Cleevelands Phases 4 and 5	Land to West of Lassington Lane, Highnam	Land at Banady Lane, Stoke Orchard	Parcel 5b Gloucester Business Park	Land west of Bredon Road, Tewkesbury
			71 Dwellings 15/01177/FUL	240 Dwellings 18/00864/APP	197 Dwellings 16/00853/FUL	150 Dwellings 15/01002/APP	35 Dwellings 17/00783/APP	253 Dwellings 18/01285/APP	225 Dwellings 18/00109/APP	52 Dwellings 15/00449/APP	127 Dwellings 15/00575/APP	113 Dwellings 16/00739/APP	234 Dwellings 16/00227/APP	88 Dwellings 16/00858/APP	45 Dwellings 15/00352/APP	31 Dwellings 15/00816/APP	68 Dwellings 16/00663/APP
No. of bedrooms	Variation	Nationally Described Space Standard (m2)	Gross Internal Area (m2)														
1 bed	1b1p1SD	39															
	1b2p1SD	50	44-46	60	61, 65	46, 47, 52	63	45, 47, 49	48, 49, 51, 52	46-53	50	46-53	50	50-56	55-61	50	53-56
	1b2p2SD	58			44												
2 bed	2b3p1SD	61		63		51, 57			59, 62, 63		78	81			60		
	2b3p2SD	70			68								65				
	2b4p1SD	70			63			56, 65									
	2b4p2SD	79	77	64, 67	62, 72, 76, 84^	65, 68, 71	80	64, 75	67, 71	78	78	78	73, 63-91	71	71	76	76
3 bed	3b4p1SD	74									93						
	3b4p2SD	84	87		80								79		89	86	
	3b4p3SD	90			86^												
	3b5p1SD	86															
	3b5p2SD	93	90, 99	81, 87, 95	82, 90, 96	79, 82, 83, 84, 85, 88, 90	94	81, 85, 87, 88	82, 84, 85, 92	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		101				101^	109^							111	
	3b6p1SD	95															
	3b6p2SD	102		92	116												
4 bed	3b6p3SD	108			108^, 120^	105, 107, 108, 116		115		101			105				
	4b5p1SD	90															
	4b5p2SD	97		116				116									
	4b5p3SD	103		116													
	4b6p1SD	99															
	4b6p2SD	106	111, 138	109, 129	100, 109, 112	108, 120	137	102, 109, 129, 144, 146	98, 107	110-132	95, 102-125	108, 131		110	118		107, 110
	4b6p3SD	112			97^	105, 107							102, 165				
	4b7p1SD	108															
	4b7p2SD	115	128	109		105, 115, 116, 126, 130, 153	135, 158	129	114	130	111	145-171		126	147-155		124
	4b7p3SD	121				153										111	
5 bed	4b8p1SD	117															
	4b8p2SD	124	120, 123, 131		130	128, 141, 149, 157	155	160, 162	125, 128, 143, 149	141-168		147-168	131-143		222		143-161
	4b8p3SD	130												183			
	5b6p1SD	103															
	5b6p2SD	110															
	5b6p3SD	116															
	5b7p1SD	112															
	5b7p2SD	119															
6 bed	5b7p3SD	125															
	5b8p1SD	121															
	5b8p2SD	128					180				163-185*				181		
	5b8p3SD	134		170		171*			139^, 141^^, 171^^, 185^^			126, 170-210*		200			
	6b7p1SD	116															
	6b7p2SD	123															
6 bed	6b7p3SD	129															
	6b8p1SD	125															
	6b8p2SD	132								125							
	6b8p3SD	138															
No. of dwellings within development falling Amount below NDSS (range)			27/71 (38%) 1-6 m2	100/240 (42%) 2-15 m2	91/197 (46%) 3-17 m2	92/150 (61%) 1-14 m2	0/35 (0%) 0 m2	27/253 (11%) 1-15 m2	121/225 (54%) 1-12 m2	22/52 (42%) 1-7m2	82/127 (65%) 1-11m2	36/113 (32%) 1-8m2	106/234 (45%) 5-10m2	30/88 (34%) 7-17m2	14/45 (31%) 1-8m2	18/31 (58%) 3-14m2	24/68 (35%) 3-17m2

Notes: 1SD: 1 storey dwelling. 2SD: 2 storey dwelling. 3SD: 3 storey dwelling. All areas rounded.
 ^ 2.5 Storey Dwelling
 * 9 - 10 Person Dwelling