

SCHEDULE OF ACTIONS MATTER 4

Housing Standards (Action 4.2)

4.2	<i>Produce evidence relating to the need for the requirements of HS8 in relation to both the optional space standards and the nationally described space standards, in line with PPG on Housing Standards</i>
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1 INTRODUCTION

1.1 During the Hearing Session on Matter 4 (Other Housing Needs), as part of the emerging Rossendale Local Plan Examination, the Inspector asked the Council to provide further evidence to justify the requirements set out in proposed policy HS8 (Housing Standards). There was also a discussion on whether it should be made clear that the standards for accessibility are in relation to Building Regulations Requirement M4(2) (accessible and adaptable dwellings), not M4(3) (wheelchair user dwellings).

1.2 This document is set out as below:

Section 2	Background
Section 3	<ul style="list-style-type: none"> • National Planning Policy Context <ul style="list-style-type: none"> ○ National Planning Policy Framework (NPPF) ○ National Planning Practice Guidance (PPG) ○ Housing: Optional Technical Standards ○ Building Regulations ○ Internal Space Standard
Section 4	<ul style="list-style-type: none"> • Demonstrating The Need For Higher Accessibility, Adaptability And Wheelchair Housing Standards In The Local Plan • Viability
Section 5	<ul style="list-style-type: none"> • Demonstrating The Need For Nationally Described Space Standards (NDSS) • Viability • Transition Period
Section 6	Conclusions
Appendix 1	Planning Application Analysis

2 BACKGROUND

2.1 Proposed policy HS8 sets out that the Council will expect at least 20% of new housing on a site to be specifically tailored to meet the needs of elderly or disabled residents, or be easily adaptable, in line with the Optional Standards. It then states that there will be a flexible approach to this, taking into account factors such as the size of the site, topography, flood risk and economic viability.

2.2 In relation to internal space, Policy HS8 states that the nationally described space standards should be the minimum provided, with more generous provision where possible. Alternatively, developers will be expected to demonstrate that the requirements of “Building for Life 12” have been met.

3 NATIONAL PLANNING POLICY CONTEXT

National Planning Policy Framework (NPPF)

3.1 Paragraph 61 states that the housing needs of different groups, including people with disabilities and older people should be assessed and reflected in planning policies. Para 127 continues that planning policies should ensure development creates places that are safe, inclusive and accessible, promoting health and well-being, with a high standard of amenity for existing and future users. Footnote 46 to this states that policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this addresses an identified need for such properties. Likewise use should be made of the nationally described space standard, where the need can be justified.

3.2 Paragraph 128 makes reference to the use of tools such as the Building for Life assessment framework in helping planning authorities achieve good design outcomes.

National Planning Practice Guidance (PPG)

3.3 The *Housing: Optional Technical Standards* PPG provides national guidance on how planning authorities can gather evidence to set optional requirements and the nationally described space standard.

Accessible and adaptable dwellings

PPG suggests a number of datasets and factors that planning authorities can consider and take into account when demonstrating the need to set higher accessibility, adaptability and wheelchair housing standards. These include:

- 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.

3.4 PPG points out that Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings. It then states that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling. As this would not apply in Rossendale, the policy cannot require dwellings to be wheelchair-accessible, only adaptable. Additionally, if any development will involve non-lift serviced multi-storey development (for example, this may be the case for conversion of older buildings) where step-free access is not viable, then optional requirements should not be applied.

Internal space standard

3.5 The PPG also includes that where a local planning authority wishes to require an internal space standard, they should only do so by reference in their Local Plan to the [nationally described space standard](#) (see below) and that they should provide justification for requiring internal space policies. In particular, 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.

Building Regulations Approved Documents

3.6 The Ministry of Housing, Communities and Local Government (MHCLG) publishes guidance called ‘Approved Documents’ on ways to meet building regulations. These contain general guidance on the performance expected of materials and building work in order to comply with the building regulations. The relevant document for this policy is Approved Document M Volume 1: Access to and use of buildings, particularly Part M4(2) Accessible and Adaptable dwellings.

3.7 Whilst M4(1) for visitable dwellings is mandatory, M4(2) and M4(3) are ‘optional requirements’ as defined in the Building Regulations. These only apply where a condition that one or more dwellings should meet the relevant optional requirement is imposed on new development as part of the grant of planning permission.

The Building Regulations set out the performance objectives to meet the optional accessibility standards for M4(2) as:

- (a) Within the curtilage of the dwelling, or the building containing the dwelling, it is possible to approach and gain step-free access to the dwelling and to any associated parking space and communal facilities that are intended for the occupants to use;
- (b) There is step-free access to the WC and other accommodation within the entrance storey, and to any associated private outdoor space directly connected to the entrance storey;
- (c) A wide range of people, including older and disabled people and some wheelchair users, are able to use the accommodation, including its sanitary facilities;
- (d) Features are provided to enable common adaptations to be carried out at a future date to increase the accessibility and functionality of the dwelling;
- (e) Wall-mounted switches, socket outlets and other controls are reasonably accessible to people who have reduced reach.

Nationally described space standards (NDSS)

3.8 In October 2015, the government introduced a new nationally described space standard, which sets out detailed guidance on the minimum size of new homes. Local authorities can treat these as optional and they must be introduced through the planning system (rather than through building regulations) by inclusion in a Local Plan policy.

3.9 This standard deals with internal space within new dwellings and is suitable for application across all tenures. It sets out requirements for the Gross Internal (floor) Area

(GIA) of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height.

3.10 The standard requires that:

- a. the dwelling provides at least the gross internal floor area and built-in storage area set out in Table 1 below
- b. a dwelling with two or more bedspaces has at least one double (or twin) bedroom
- c. in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m² and is at least 2.15m wide
- d. in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m²
- e. one double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide
- f. any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1m² within the Gross Internal Area)
- g. any other area that is used solely for storage and has a headroom of 900-1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all
- h. a built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72m² in a double bedroom and 0.36m² in a single bedroom counts towards the built-in storage requirement
- i. the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area

3.11 Table 1 below reproduces the standards taken from the National Space standards documents, setting out the minimum gross internal floor areas and storage expected.

Table 1: Minimum gross internal floor areas and storage (m²) as set out in the NDSS

No. of bedrooms (b)	No. of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) ¹	/	/	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	

¹ Where a 1bed 1person dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m²

4 DEMONSTRATING THE NEED FOR HIGHER ACCESSIBILITY, ADAPTABILITY AND WHEELCHAIR HOUSING STANDARDS IN THE LOCAL PLAN

4.1 This section will set out the Council's evidence for requiring higher standards, based on the criteria in PPG. This is largely taken from the 2019 update to the Strategic Housing Market Assessment (SHMA), which was prepared to inform the Local Plan (Examination library ref. [EB002](#)) as well as the 2016 SHMA ([EB003](#)), which included a Household Survey, and following discussions with the Council's Strategic Housing and Building Control sections.

Likely future need for housing for older and disabled people

Housing for older people

4.2 The SHMA 2019 states that, in line with national trends, the population of older people in Rossendale is projected to be the fastest growing in the next 15 years, increasing by 35% by 2034, by far the fastest growth of any age group.

4.3 This is shown in the Table 2 below, taken from the 2019 SHMAA2 which continues "meeting needs of older people will be a key element of meeting overall needs over the period to 2034 (and beyond)".

Table 2: Projected population change by broad age group – Rossendale

	2019	2034	Change	%
0-15	14,131	13,805	-326	-2%
16-44	23,488	23,965	477	2%
45-64	19,746	18,397	-1,349	-7%
65+	13,339	18,030	4,691	35%
Total	70,704	74,197	3,493	5%

Source: Lichfields using PopGroup (2014-based SNPP)

4.4 The SHMA recognises that specific accommodation needs of older people fall within two different groups:

- Those in need of communal establishment accommodation (i.e. bedspaces), including residential care homes or specialist nursing homes (C2); and
- Older people living in private C3 housing who do not require care home facilities but may have specific needs, for example for adaptable and accessible homes, or those living in self-contained units as individual households but where some degree of care

² Table 7.3: Projected population change by broad age group – Rossendale Borough; EB002 – SHMA 2019 Update
Source: Lichfields using PopGroup (2014-based SNPP)

is provided (e.g. extra care or sheltered housing). This second group is the most relevant to policy HS8.

Accommodation for older people and housing supply

4.5 For planning purposes, as well as communal care accommodation, some other forms of housing which provide an element of care could also fall under C2 use, for example some of the numerous types falling under the term 'extra care housing'. However, where these provide self-contained units for occupation by households, they are considered part of general housing needs, i.e. C3. These units meet the needs associated with households and are therefore included within the household projections. Supply of these units can therefore be counted as housing supply against the Local Housing Need.

4.6 Collectively, Extra Care and Sheltered Housing specifically targeted at older households are referred to as 'elderly housing' in the SHMA study. The previous SHMA (from 2016) reported that, in 2014, the supply of extra care units amounted to 42 and there were 826 sheltered housing units (self-contained accommodation for older people with secure access, telecare and a floating warden service), giving a total supply of 868 units. This figure also aligned with the Extra Care figures subsequently reported in Lancashire County Council's "*Housing with Care and Support Strategy 2018-2025*". Based on the total population aged 75+ in 2014 in Rossendale of 4,965, this equated to 175 units per 1,000 residents aged 75+.

4.7 Between 2019 and 2034, the number of residents aged 75+ living in Rossendale is projected to increase by 3,472 in the 2014-based SNPP. Applying the above ratio to the net increase in residents suggests that between 2019 and 2034, the estimated need for elderly C3 housing units would be 607 (40dpa).

Housing for Residents with Disabilities

4.8 Similarly to older people, the housing needs of people with disabilities will fall into two broad groups:

- Those in need of communal establishment accommodation, including residential care homes for those with learning difficulties or physical disabilities, or specialist nursing homes (C2); and
- Those living in private housing who do not require care home facilities but may have specific needs, for example for adaptable and accessible homes. Adaptable and accessible homes are defined as: "*a new dwelling makes reasonable provision, either at completion or at a point following completion, for a wheelchair user to live in the dwelling and use any associated private outdoor space, parking and communal facilities that may be provided for the use of the occupants.*" (Building Regulations 2010 Approved Document M). Again this second group is most relevant for the policy.

4.9 As PPG states that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating future residents, the SHMA has only assessed the need for such homes in relation to the affordable sector.

4.10 The SHMA analysed the housing register for Rossendale, which includes the overall number of households on the waiting list and the mix of housing they require. The list shows that of the 928 households in the 'reasonable preference'³ category, 63 include a wheelchair user, 313 include a disabled member of the household and 120 require adaptations to be made to their property.

³ A social housing provider's allocations policy must give some priority to certain groups of people. This is called giving 'reasonable preference'.

4.11 Whilst accurately calculating the specific needs for wheelchair user dwellings is difficult, a broad estimate can be made, based on the disabling conditions identified of those currently claiming disability living allowance. The SHMA assumes those with learning difficulties, mental health conditions and those who are deaf or blind do not require wheelchair accessible dwellings. Other conditions (most of which could be expected to affect physical ability and could require a wheelchair) account for 67% of all disabling conditions.

4.12 On the basis of this, the SHMA assumes that around 67% of households on the waiting list who need to move for reasons related to welfare and/or health would be in need of wheelchair accessible dwellings. Furthermore, 63 of the 928 households on the Waiting List in Registered Preference categories are either a wheelchair user themselves or live with a wheelchair user, representing 7% of overall need.

4.13 Given the ageing population increase expected over the Plan period, the SHMA recommends that at least 10% of new affordable homes should meet the M4(3) requirement for wheelchair users, albeit this is likely to overlap with some of the need for adaptable and accessible homes for older people.

4.14 The SHMA recommends that the Council keeps the housing waiting list under review, and if possible collect information on whether a household specifically needs a wheelchair accessible dwelling. Therefore, the following information has been taken from the latest Housing Register:

Table 3: Housing Register Adaptations Data (RBC, March 2020)

	Yes	Total	% Yes
Any Adaptation Needed	158	1504	10.5%
Level Access Accommodation Needed	288	1504	19.1%
Household Has Wheelchair user	87	1504	5.8%
Ramped Access Needed	4	1504	0.3%
Applicant requires Wheelchair Accessible	8	1504	0.5%
Wheelchair needed Outdoors	86	1504	5.7%
Adaptation Require Ground floor Bathroom	3	1504	0.2%
Adaptation Require ground floor Bedroom	2	1504	0.1%
Low Level Kitchen Units Required	1	1504	0.1%
Widened Doorways Required	3	1504	0.2%

Size, location, type and quality of dwellings needed to meet specifically evidenced needs

4.15 The SHMA makes some general points about the size and type of dwellings needed but does not identify specific recommendations for older people's / disabled housing. As highlighted in the Housing Delivery Test Action Plan, however, information provided by the Council's Strategic Housing Team indicates that the suitability and location of existing older people's housing can be an issue, for example, bungalows which are located on steep roads or in flood-risk areas; therefore there is a need for dwellings nearer town centres, away from flood risk and on flatter land.

4.16 The 2017 SHMAA states (p163) that there is a clear requirement for properties that can be adapted to suit their occupants across the local authority area. Many households with at least one disabled adult have already carried out adaptations. It is noticeable that the number of disabled households on the Housing Register is high when compared to the relative proportion of the Borough's population. This implies an under-provision of suitable housing for people with disabilities which needs to be planned for in Rossendale.

Accessibility and adaptability of existing housing stock.

4.17 There is no specific data on the accessibility of housing stock in Rossendale, and Unfortunately much of the baseline data relies on the 2014/15 English Housing Survey. This identified that just 7% of homes in England had all four accessibility features for visitability, which are: a level access to the entrance; a flush threshold; sufficiently wide door sets and circulation space; and a toilet at entrance level. In the main this study found that 64% had a toilet at entrance level whereas the presence of the other visitability features was much less common. The age of the dwellings and their type has a bearing on the number of visitability features. Homes built after 1990 score better on possessing all 4 features (34%). Changes to Building Regulations has led to an increase in new homes having level access.

4.18 Table 4 below shows that terraced houses (as of 2014) were most likely to have no visitability features present, with flats tending to have the maximum number of features. Given that Rossendale has a higher proportion of terraced properties compared to the national average (43% compared to 24.5% nationally) and a lower proportion of flats (10.9% compared to 22.5%), it is reasonable to assume that Rossendale's dwelling stock performs significantly worse compared to the rest of the country, even with the time-lag in data.

Table 4: Number of Visitability Features by Dwelling Type

Number of Visitability Features Present According to Dwelling type (bungalows included by type)								
	0	1	2	3	4	Total %	% of Dwelling Type England (2011 Census)	% of Dwelling Type Rossendale (2011 Census)
terraced house	40.6	36.1	13.6	5.3	4.5	100	24.5	43.6
semi-detached house	33.7	42.3	16	5.5	2.5	100	30.7	25.3
detached house	8.8	49.5	27.7	8.7	5.3	100	22.3	20.2
flat	9.5	23.7	25.2	22.1	19.5	100	22.5	10.9

4.19 Table 5 below compares the number of visitability features according to the age of properties. Unfortunately there is no local data available but the English Condition Survey provided a national picture, showing that homes built after 1990 score better on the number of visitability features present than houses built previously, but still only 34% of modern

homes have all four features. Part M of the Building Regulations, introduced in 1999, has led to an increase in homes with level access.

Table 5 : Number of Visibility Features By Dwelling Age

Number of Visitability Features Present According to Dwelling age								
	0	1	2	3	4	Total %	% of Dwelling Age (2014 English Housing Survey) England	% of Dwelling Type (2011 Census) - Rossendale
pre 1919	34.1	42.6	17.4	5.1	0.7	100	20.8	not available
1919-44	33.7	43.8	17.6	4.1	0.9	100	15.8	not available
1945-64	30.3	41.9	19.2	7.3	1.2	100	19.1	not available
1965-80	20.7	41.8	23.5	10.7	3.4	100	19.6	not available
1981-90	21.1	38	23.2	11.1	6.5	100	7.9	not available
1990-2013	7.5	18.5	18.8	20.9	34.3	100	16.8	not available

4.20 The Council is involved in adapting around 100 properties a year across all tenures, and receive around 120 referrals.

4.21 The 2017 SHMA included a Household Survey, which identified (para 10.66) a range of reasons given by households containing older people (aged 65+) for their housing being unsuitable (albeit based on a relatively low number of households). The most frequently quoted reason was sub-standard access to their house, or the presence of stairs. The number of older households in need is below the average for Rossendale. This may be a reflection of the number of households that have been able to adapt their property to meet their needs - around 17% of households that responded to the study have made adaptations to their properties already and a further 3.3% need to make adaptations. The most common adaptations tended to relate to mobility/stairs as well as shower or bathroom facilities.

How needs vary across different housing tenures

4.22 The SHMA highlights 2011 Census data which shows that 29% of people over age 65 in Rossendale were living with a long-term health problem or disability [LTHPD] which limited their day-to-day activities 'a lot' and a further 27% whose day-to-day activities were limited 'a little'. However, this was not equal across all tenures; those in social rented housing were significantly more likely to have conditions limiting their day-to-day activity a lot. Additionally, there was a far greater percentage of older residents in social rented housing living with a LTHPD. As a result, the SHMA recommended the Council should seek a greater proportion of M4(2) dwellings within affordable housing than in private housing.

Overall impact on viability

4.23 The 2019 Economic Viability Assessment (ref. [EB109](#)), undertaken to inform the emerging Local Plan, included the requirements of policy HS8 in its viability modelling for the housing allocations. The base position assumes a development of entirely market housing.

4.24 The assessment translated the policy requirement to be the equivalent of meeting Optional Requirement M4(2) with a cost of £1,100 per house and £750 per apartment (on 20% of dwellings). In addition this policy requires all new dwellings to meet the requirements of the Nationally Described Space Standard and this was taken into account in the size of the dwellings that have been adopted for the purpose of the testing. The mix that was adopted for the purpose of the viability testing was also inclusive of 3% of the dwellings being 2 bed bungalows. This was introduced to reflect the findings of the SMHA in relation to elderly provision and single level accommodation.

4.25 The Assessment splits the locations of the housing allocations into four value zones with Zone 1 considered to be the least viable and Zone 4 to most viable. The results of the testing showed that the requirements to achieve M4(2) generally have a relatively limited impact on viability with a cost of around £2 per sq.m. Where development is viable, then these standards can generally be supported and do not have a significant impact on viability.

4.26 It is to be noted that the policy does allow for some flexibility in this requirement and will take into account specific factors such as the size of the site, topography, flooding, viability and so on. Please also note that further viability work is being carried out.

5 NATIONALLY DESCRIBED SPACE STANDARDS (NDSS)

5.1 Space standards are intended to ensure that new dwellings provide a reasonable level of internal space to undertake day to day activities, at a given level of occupancy. Lack of adequate space and overcrowding can have an impact on health and wellbeing.

Local evidence to demonstrate need to adopt NDSS

5.2 Information on existing dwelling sizes can be found in Office for National Statistics (ONS) data which provides the median floor space per property type for local authorities. The findings for Rossendale are set out below:

Table 6: Median floorspace by property grouping, Rossendale

Type of property	Median floor space (m ²)
House	97
Bungalow	78
Flat	46
Maisonette	64.5
Other	53
All	92

(Source: Valuation Office Agency, ONS)

5.3 The Council has selected a sample of three recent developments involving major residential schemes and analysed whether the overall floorspace and individual bedroom dimensions accorded with the NDSS (as set out in Table 7), as follows:

Table 7: Sample of planning permissions for size analysis

Site Reference	No. of dwellings	House Types	Original planning application ref. no.
Development A, Edenfield	10	House Type 1 (3 Bed) x 5 House Type 2 (4 Bed) x 1 House Type 3 (4 Bed) x 4	2015/0238
Development B, Rawtenstall	19	House Type AX (2 Bed) x 2 (bungalow) House Type A (3 Bed) x 4 House Type B (3 Bed) x 2 House Type C (4 Bed) x 8 House Type D (4 Bed) x 3	2018/0132
Development C, Bacup	22	House Type A1 (3 Bed) x 2 House Type C1 (3 Bed) x 4 House Type D1 (4 Bed) x 3 House Type E1 (4 Bed) x 8 House Type F1 (4 Bed) x 1 House Type G1 (4 Bed) x 4	2018/0202

5.4 The detailed dimensions are set out in Appendix 1 but to summarise: based on the minimum standards at the lower end of the scale (i.e. assumes 1 bedroom occupied by 2 people, remaining beds occupied by 1 person) all the developments met the **overall** dwelling floorspace standard. This is the case too for the median sizes for all dwellings (Table 3).

5.5 However, in relation to **bedroom** sizes, Table 8 below shows that most house types fell short of meeting the NDSS (these are highlighted red):

Table 8: Planning application analysis - bedroom sizes

Development / House Type	How many rooms meet double floorspace standard?	How many rooms meet double width standard?	How many rooms meet single floorspace standard?	How many rooms meet single width standard?
Development A:				
House Type 1 (3 Bed)	2	2	2	3
House Type 2 (4 Bed)	1	2	2	3
House Type 3 (4 Bed)	3	3	3	4
Development B:				
House Type AX (2 Bed /1storey)	1	1	2	2
House Type A (3 Bed)	0	2	2	3
House Type B (3 Bed)	0	1	2	2
House Type C (4 Bed)	2	2	3	3
House Type D (4 Bed)	2	4	4	4
Development C:				
House Type A1 (3 Bed)	1	2	2	3
House Type C1 (3 Bed)	1	2	2	3
House Type D1 (4 Bed)	1	2	3	3
House Type E1 (4 Bed)	1	3	4	3
House Type F1 (4 Bed)	1	3	3	4
House Type G1 (4 Bed)	2	3	3	4

5.6 On the whole, most developments had at least one double bedroom which met the standard – although two house types in Development B did not achieve this. As some of these dwellings were 4 bedroomed properties, it may be expected that more than one bedroom could be a double.

5.7 Most significantly, the smallest bedrooms of most properties were not big enough to meet the standard for a single bedroom, mostly in relation to the floor area but also in terms of the width of the room.

5.8 A reasonable expectation would be that all dwellings should have at least one bedroom which meets the NDSS for a double bedroom in terms of floor area and width (with perhaps two meeting this standard depending on the total number of bedrooms). The remaining bedrooms should then all meet the standards for a single bedroom. In this respect, the Council feel it is justified in requiring the NDSS in policy HS8 – particularly given the predominance of older, small, terraced properties in the existing housing stock.

Viability

5.9 The Viability Study (2019) addresses the Council's expectations in relation to housing standards and in particular the expectation that new housing developments will as a minimum meet the requirements for internal space in the Nationally Described Space Standards. The dwelling sizes that were adopted therefore accord to the requirements of these standards (para 7.08).

Transition period

5.10 The Council acknowledge the advice in PPG that a transition period may be necessary if minimum space standards are adopted. This would allow developers more time to factor the space standards into their costings. It should be noted that the intention to introduce a space standard was first suggested at the Regulation 18 (Draft) Local Plan consultation stage in July 2017. As such this intent has been in the public domain for over 2½ years and by the time of adoption, this will be over 3 years. The Council's preference therefore would be to adopt and implement the policy alongside the other policies within the Local Plan.

6. CONCLUSIONS

6.1 The evidence above shows there is a clear need to provide for the needs of older and disabled residents, in line with national policy. Not only is the actual number and proportion of people aged over 65 projected to increase over the Plan period, but also the type of housing in the Borough provided in the past (in particular the predominance of older terraced properties) is not easily accessible, nor easy to adapt.

6.2 The Evidence above also demonstrates that new residential development being built in the Borough is generally not providing homes which meet the minimum space standards in respect of bedroom sizes. The Local Plan is therefore asking for the NDSS to be applied to new residential development, particularly as high quality development is necessary to improve the condition of the housing market in the Borough. The Council does not think that a transition period would be appropriate.

6.3 The implications of both parts of Policy HS8 have been taken into account in the Viability Study as explained above.

APPENDIX 1: Planning Application Analysis

2015/0238 (10 dwellings)

House Type 1 (3 Bed) x 5

House Type 2 (4 Bed) x 1

House Type 3 (4 Bed) x 4

2018/0132 (19 dwellings)

House Type AX (2 Bed) x 2 (bungalow)

House Type A (3 Bed) x 4

House Type B (3 Bed) x 2

House Type C (4 Bed) x 8

House Type D (4 Bed) x 3

2018/0202 (22 dwellings)

House Type A1 (3 Bed) x 2

House Type C1 (3 Bed) x 4

House Type D1 (4 Bed) x 3

House Type E1 (4 Bed) x 8

House Type F1 (4 Bed) x 1

House Type G1 (4 Bed) x 4

Source: RBC Building Control data

Bed1 m ²	Bed1 width	Bed2 m ²	Bed2 width	Bed3 m ²	Bed3 width	Bed4 m ²	Bed4 width	Overall m ²
13.84	3.41	12.57	2.57	5.61	2.36	-	-	86.16
16.6	3.98	9.41	2.98	6.79	2.34	4.09	1.94	125.4
15.96	3.19	14.95	3.58	18.09	3.93	6.98	2.49	125.3
15.89	4.09	9.57	2.81	-	-	-	-	74.6
10.89	2.79	9.12	2.59	6.23	2.35	-	-	85.84
10.89	2.71	10.07	2.71	5.38	2.11	-	-	90.12
12.34	3.41	12.2	3.98	7.89	2.31	5.10	2.11	97.92
13.04	3.16	12.02	3.31	8.96	3.10	8.76	3.10	119.2
13.04	3.53	11.1	2.66	4.95	2.16	-	-	91.75
14.58	2.59	9.14	3.59	4.38	2.59	-	-	95.49
13.75	3.66	10.93	2.82	4.41	2.06	14.62	2.82	122.2
16.02	3.08	11.3	2.99	9.55	3.30	7.51	2.12	123.3
9.088	3.02	6.83	2.33	12.88	3.34	8.75	2.65	117.1
15.26	3.75	12.14	3.12	9.11	2.88	6.17	2.29	133.6