

Hart Local Plan:
Strategy and Sites 2016 – 2032
Topic Paper: Internal Space Standards for New
Homes
Updated June 2018

Introduction

1. In order to improve residents' quality of life the Government in the Written Ministerial Statement ¹ in March 2015 gave Local Authorities the option to set technical standards for new housing. The system provides local authorities with the option to set additional technical requirements exceeding the minimum standards required by the Building Regulations.
2. One of these optional standards is the Nationally Described Space Standards (NDSS). Unlike other aspects of the Housing Standards Review, the space standards have not been incorporated into the Building Regulations, but can only be applied providing there is a policy in the Local Plan. The standards set minimum gross internal floor space in relation to dwelling type, numbers of bedrooms, number of occupants, size of bedrooms and ceiling heights. The requirements are set out in Technical Housing Standards – Nationally Described Space Standards².

Purpose

3. Policy H6 of the Proposed Submission Hart Local Plan sets out the requirement that where planning permission is required development proposals for new market and affordable homes must meet or exceed the nationally described internal space standards. The purpose of this topic paper is to demonstrate why the Council considers it necessary to require these standards for new homes within the District.

National Policy and Guidance

4. The Nationally Described Space Standards now consist of a single set of Gross Internal Areas which represents a reasonable level of internal provision for new dwellings. The standard incorporates requirements for internal storage, minimum bedroom size and a minimum floor to ceiling height.
5. The standards provide greater certainty for developers across different local authority areas to enable them to fully assess development costs and will reduce design and development costs by creating a standard design. The NDSS replace previous housing standards such as Code for Sustainable Homes, Housing Quality Indicators and Lifetime Homes.
6. Local authorities have the opportunity to introduce these standards as part of their Local Plan. The DCLG Housing Standards Review states that for private housing the extra over cost of delivering the new standard against the baseline in the English Housing Survey distribution has been estimated and this has been compared with the cost of the current space standards to give a saving. (Housing Standards Review: Final Implementation Impact Assessment, March 2015).
7. Homes and Communities Agency Housing Quality Indicators were used to ensure provision of a minimum size of dwelling and also provided incentives so that a proportion of homes were built above this minimum standard. These standards are no longer in use and therefore developers and Registered Providers are not monitored on the size of the affordable housing units they deliver and this is no longer linked to their funding allocations.

¹ Written Statement to Parliament: Planning Update, March 2015

² Technical Housing Standards – Nationally Described Space Standards, DCLG, March 2015

8. Guidance on the new optional nationally described space standards is set out in Planning Practice Guidance also issued in March 2015. If Local Authorities intend to apply the optional space standards then they will need to include a Policy in their Local Plan to require residential development to comply with the standards. Local Planning Authorities will however, need to gather evidence to determine whether there is a need for the additional standards in their area and to justify it. LPA need to provide evidence to justify why this is necessary taking account of the following:

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 standards 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.

Why the minimum internal space standards are required for Hart

9. The Nationally Described Space Standards will enable the construction of new dwellings in the District which will be of good quality, and provide an adequate level of amenity for future occupants. The standards would also support the achievement of proposed policies in the local plan such as Policy NBE10 on design quality as it would relate to housing development.
10. All new dwellings should be of a reasonable size to accommodate the number of people they are intended to house. Recent national trends have indicated that the average size of dwellings has been falling³. Research by the Royal Institution of British Architects revealed that more than half of newly built homes are not of sufficient size to meet the needs of the people who bought them (RIBA Space Standards for Homes, 2015). It shows that a significant proportion of the new homes fall below what is considered to be a reasonable size.
11. Living spaces should cater for the activities of all members of the household. Children and young people need space in their bedrooms for playing, hobbies and studying. There should also be enough space to allow for storage which should be suitable for the needs of the likely occupants. For example, pushchairs for families and equipment for people with disabilities.
12. In recent years the District has seen a significant increase in the number of dwellings completed and permissions granted for residential development. Whilst many sites have provided accommodation to the DCLG standards some are below this. In one particular instance the developer proposed providing very small units of affordable housing and the Registered Provider informed the Council that it would not be willing

³ RIBA HomeWise Report

<https://www.architecture.com/-/media/gathercontent/space-standards-for-homes/additional-documents/homewisereport2015pdf.pdf>

to purchase units of that size. The application that was eventually made included a number of units that were well below the old HCA space standards.

13. Another reason for including the minimum space standards is that since the removal of the HCA Housing Quality Indicator system there is concern that there will no longer be a safeguard to ensure that developers build affordable housing to reasonable space standards. If a trend for providing small units accelerates there is a risk that some of the RP's may take a decision not to purchase the affordable housing on offer as it would not offer sensible living spaces, and therefore may lead to reduced numbers of affordable housing being provided in the District when the actual need for this is significant and consistent over time. Therefore in terms of affordable housing, it is important that the homes meet the DCLG standards as they are generally fully occupied. Affordable housing is a scarce resource in Hart and therefore households are normally allocated to the size of home which their household will make best use of.
14. Also, due to national changes for benefits introduced through the Welfare Reform act 2012 known as the "spare room subsidy" it is very rare for an affordable home to be under-occupied. As a result, having clear space standards will ensure that households have well-designed homes that reflect and allow for the changing and varying needs of households. Having sensibly sized properties allows the Council and Registered Providers (RPs) to allocate the stock to a wider range of households

An Analysis of the size of dwellings currently being achieved

15. Representations made to Policy H6 Internal Space Standards for New Homes during consultation on the Draft Submission Local Plan argued that the policy is unjustified and that there is no evidence to support its introduction. In response the Council has undertaken additional work to assess the size and type of dwellings recently completed and granted detailed planning permission in Hart District in order to consider the potential impacts.

Methodology

16. In order to establish an understanding as to the size and type of dwellings currently being built in the District, a varied sample of dwellings from 13 sites with planning permission granted between July 2014 and April 2018, some of which have been built, was selected and analysed. In total the gross internal floorspace area of 177 dwellings was obtained or measured from floor layout plans submitted with planning applications. The sample consisted of 71 general market dwellings and 106 offered as affordable housing. The dwellings assessed included schemes across a variety of locations within the District including brownfield and greenfield sites within and on the edges of settlements; such as Fleet, Church Crookham and Hook.
17. Detailed information on the size of the different types of dwellings measured was recorded to enable comparison with the Nationally Described Space Standards. The information for each type of development and dwellings recorded is included in Appendix A to this Topic Paper. As the measurements and information in some instances have been taken from electronically submitted plans there may be some slight minor discrepancies. Comparison to standards relating to minimum widths recommended for bedrooms within the dwellings has also been considered.

Results

18. The analysis of the dwellings is summarized in the table below which breaks down the dwellings considered into those that were granted before and after March 2015 when the NDSS were announced by the government.

Summary: Dwellings measured compared to the NDSS - Hart DC, June 2018

Pre March 2015				
	Affordable		Market	
Meets NDSS	23	49%	26	79%
Does not meet NDSS	24	51%	7	21%
	47		33	
Post March 2015				
Meets NDSS	24	41%	27	71%
Does not meet NDSS	35	59%	11	29%
	59		38	

19. As can be seen the evaluation provides a mixed picture in terms of the gross internal floor sizes being achieved across schemes. Nearly 80% of market dwellings met or exceeded the NDSS before March 2015 in terms of gross internal floorspace area. However a fifth of properties did not meet the standards prior to March 2015 and this has increased to nearly one third of market properties post March 2015
20. In the affordable housing sector a very much higher percentage (59%) of affordable dwellings permitted since March 2015 do not meet the national standards. This represents an 8% increase in the percentage of dwellings not meeting the standards compared to affordable dwellings permitted before March 2015. The analysis indicates that since the removal of the HCA Housing Quality Indicator system, which is a measure of the quality of affordable homes, there has been an increase in the number of affordable homes not meeting the space standards from 51% to 59%. This provides evidence for the concern expressed in paragraph 13 above that in the absence of any standards to regulate the size of dwellings, developers are under no obligation to build reasonable sized dwellings. It is therefore essential that the standards are adopted as no other standards are allowed.
21. The analysis points to a general finding that smaller properties are the least likely to meet the standards. Since March 2015 more than half of all dwellings permitted were one and two bedroom flats which did not meet the NDSS. Large house types are most likely to meet the new space standards.
22. Overall the balance of evidence shows that a high proportion of newly built and permitted dwellings in Hart District, particularly in the affordable housing sector, fall short of meeting the NDSS. Nearly half of all properties assessed (47%) which have been granted post 2015 did not meet the national standards. This demonstrates a need for the standards to be introduced and adhered to in new developments. The Council therefore considers that based on the evidence there is a clear justification for Policy H6 of the Submission Local Plan to require that all new dwellings should meet or exceed the nationally described space standards. The requirement should apply to housing of all tenures including the conversion of existing buildings into flats and smaller dwelling units. This would ensure that high quality homes are delivered and households have sufficient space to live within the dwellings.

Viability

23. The Whole Plan and CIL Viability Study 2016 (and Addendum 2017) establishes what levels of affordable housing provision are sustainable and achievable in the area. This has used the DCLG Space Standards as the basis for calculating the size of the properties and has found that if Hart adopts the DCLG space standards for new housing developments it will not affect the viability of proposed developments.
24. The cost impact study of introducing the standard issued by the Government alongside the Housing Standards Review provided an analysis of evidence on increasing the space standards in new homes. For example the cost of adding two square metres to a one bedroom apartment is calculated at £1444, however when increased sale value is taken into account the additional cost to the developer is £146. This represents a very small proportion of increased additional costs. The position is even less significant when looking at the example of a three bed semi-detached property where the additional cost to the developer after the increased sale value is estimated at £128⁴. The proportion of costs that are recovered through increased value tend to decrease when more space is added. It is considered that the small increases in costs are unlikely to have an adverse impact upon the affordability of potential purchasers as the increase in monthly mortgage repayments would be relatively small, particularly for smaller properties.

Timing

25. It is not considered necessary for the Council to apply a transition period following adoption of the new local plan policy to enable developers to factor in the cost of introducing the space standards. The NDSS were established in March 2015 and developers have become well aware of the requirements and accustomed to the need to factor the standards into land acquisitions.

Conclusion

26. In light of the above and the additional evidence work undertaken, it is considered that the DCLG Nationally Described Space Standards should be applied to both new open market and affordable housing. Adoption will provide clarity and consistency for developers to ensure that they are clear about the requirements for the housing to be built in the District. This will also ensure that homes provided will be of the appropriate high quality, sustainable and accessible. The space standards also take into account the spatial implications of providing improved accessibility and adaptability, particularly for less mobile people. This will contribute towards improving the quality of life of the residents of the District and implementation would not affect viability.

⁴ Department for Communities and Local Government Housing Standards Review – Cost Impacts, September 2014, tables 37&37a