



DEVELOPMENT AND SITE ALLOCATIONS LOCAL PLAN

PROPOSED SUBMISSION

SPACE STANDARDS

BACKGROUND PAPER

October 2018

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Please telephone: (01424) 787668

Email: planning.strategy@rother.gov.uk

1.0 Introduction

- 1.1 The Technical Housing Standard sets out the [Nationally Described Space Standards](#) (NDSS) within new dwellings across all tenures. The NDSS for residential dwellings replaces all other space standards used by local authorities, meaning that if space standards are to be used by local planning authorities they must use the national standards. It gives local councils the ability to “opt in” to these standards through their Local Plan. The standard is one part of a wider [housing standards review package](#) which the government announced on 27 March 2015.
- 1.2 The Planning Practice Guidance (PPG) requires the gathering of evidence to determine whether there is a local basis for adopting them, as well as consideration of how the setting of optional standards affects viability and delivery of development.
- 1.3 The Government’s internal space standards sets out the minimum 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, floor to ceiling height and a minimum requirement for built-in storage (BiS). Figure 1 below shows the minimum gross internal floor areas and storage.
- 1.4 In introducing the Written Ministerial Statement as part of the wider housing standards review, Lifetime Homes were effectively replaced by these new Standards.
- 1.5 Guidance on the use of these Standards is set out within the Planning Practice Guidance. Local planning authorities who wish to adopt space standards must provide justification for requiring them.

“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”.*(Paragraph: 020 Reference ID: 56-020-20150327)

Figure 1. Nationally Described Space Standards: DCLG

Bedrooms (b)	Bed Spaces (p)	Gross Internal Area (m ²)			Built-in Storage (m ²)						
		1 Storey	2 Storey	3 Storey							
1b	1p	39(37)			1						
	2p	50	58		1.5						
2b	3p	61	70		2						
	4p	70	79								
3b	4p	74	84	90	2.5						
	5p	86	93	99							
	6p	95	102	108							
4b	5p	90	97	103	3						
	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						
	8p	125	132	138							
Bedroom Sizes		Minimum Floor Area (m²)		Minimum Width (m²)							
Main Bedrooms		11.5 (MBA)		2.75 (MBW)							
Additional Double Bedrooms		11.5 (DBA)		2.55 (DBW)							
Single Bedrooms		7.5 (SBA)		2.15 (SBW)							
Headroom			m²								
75% of GIA minimum			2.3								
Note: Any area used solely for storage and has a headroom of 0.9-1.5m is counted at 50% of its floor area, and any area lower than 0.9m is not counted at all.											
Additionally:											
<ul style="list-style-type: none"> • All dwellings with at least two bed spaces are required to have one main bedroom. • If there is under stair storage, 1m² can be included in the GIA. • Built in storage within a bedroom can be included in the bedroom floor area but not included in the widths. Any built-in storage in a bedroom can be included in the BIS requirements if in excess of 0.72m² in a MB/DB or 0.36m² in a SB. 											

- 1.6 This background paper sets out the evidence and justification for adopting the NDSS. It provides supporting information which demonstrates a local need for and respective viability impacts of introducing the Standards.

2.0 Current practice through adopted Local Plan Policy

- 2.1 Rother District Council does not currently require any internal space standards through existing local plan policy within the adopted Local Plan (2006)¹. However Policy OSS4 (General Development Considerations) in the Rother Core Strategy Local Plan (adopted 2014) states that “*In addition to considerations set out by other policies, all development should meet the following criteria: (i) It meets the needs of future occupiers, including providing appropriate amenities and the provision of appropriate means of access for disabled users...*”. Whilst Policy LHN1 (Achieving Mixed and Balanced Communities) states that “*in order to support mixed, balanced and sustainable communities, housing developments should...provide a proportion of homes to Lifetime Homes Standard*”. These policies require developments to meet the needs of their occupiers allowing for sufficient space and privacy to ensure long-term sustainability and usability of new housing stock within the District.
- 2.2 Affordable housing which has been built within the District have typically been built to space standards set out in the Homes England (formerly the Homes and Communities Agency) Housing Quality Indicator (Hqi) Standards, which are slightly smaller than those set out in the NDSS. This is something that the Council’s Housing Policy team has strongly encouraged. Typically ,in order for a Registered Provider to secure grant funding from the HCA, affordable housing is required to be built to the HQI Standards², which includes minimum sizes for internal space.

3.0 Development and Site Allocations (DaSA) Local Plan – Options and Preferred Options Consultation

- 3.1 The DaSA Local Plan consultation put forward the adoption of the NDSS as the Council’s preferred option. In response to the Consultation there was a mix of views. Developers questioned in the need and appropriateness of introducing the standards, whereas individuals and other organisations supported the use of the standards to improve living standards. In some instances, these groups challenged the standards as being too small and that RDC should encourage more generous standards locally. Further details on the comments received to the consultation can be seen the consultation statement³.

¹ <http://www.rother.gov.uk/CHttpHandler.ashx?id=4207&p=0>

² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/366634/721_hqi_form_4_apr_08_update_20080820153028.pdf

³ <https://www.rother.gov.uk/dasa>

4.0 Local evidence on compliance with Space Standards

Overall floorspace

- 4.1 The Council does not collect and record data on internal floorspace as there has not previously been any adopted space standard within the District. However, in support of the Council's Local Plan Viability Assessment, an audit of new properties sold in the District was undertaken to identify the average unit sizes of new-build properties using Energy Performance Certificates (EPC)⁴.
- 4.2 The dwelling units assessed as part of this research from new-build transactions between January 2013 – July 2018) includes:
- Donsmead, Northiam,
 - Dorset Road, Bexhill
 - Galley Hill, Bexhill
 - High Street, Etchingham,
 - Little Common Road, Bexhill
 - Main Street, Peasmash,
 - Pebsham Lane, Bexhill,
 - Udimore Road, Rye
 - Woodlands Way, Hastings Fringes
 - White Sands, Camber
- 4.3 Figure 2 shows the analysis of the average units sizes of new –build dwellings in the District.

Figure 2: Average units sizes of new –build dwellings in the District

Flats	Terraced	Semi-detached	Detached
68sq.m	102sq.m	89sq.m	138sq.m

- 4.4 Whilst the space standards cover a range of sizes according to differing numbers of bedrooms, numbers of storeys and numbers of residing persons, it has been possible to determine an average of the minimum sizes for homes based on bedroom numbers as set out below.

Figure 3: Average floorspace assumptions for National Space Standards and Optional Building Regulations – M4(2) – Accessible and Adaptable Dwellings

	1-2 bed flats (NIA) ⁵	2 bed house (GIA)	3 bed house (GIA)	4+ bed house (GIA)
NSS	55	75	93	117
M4(2)	58	83	105	126

⁴ An Energy Performance Certificate is required for properties when constructed, sold or let. The Energy Performance Certificate provides details on the energy performance of the property and what can be done to improve it.

⁵ Note that the Net Internal Area (NIA) applies for flats only as it does not include shared/circulation space, GIA stands for Gross Internal Area.

- 4.5 A comparison of the new build dwelling sizes shown in Figure 2 based on EPC records, with the minimum NSS in Figure 3, implies that typical new builds in Rother are already exceeding standard in terms of GIA. If anything, the sizes in Rother are closer to the minimum standards for the higher Building Regulations standard for accessible and adaptable dwellings defined at M4 (Category 2) homes⁶, which is also shown in Figure 3. This is also supported by feedback from developers who responded to Local Plan Viability consultation.

Internal configuration of new dwellings

- 4.6 Further research has been undertaken to determine the internal minimum floor areas/widths for bedrooms as well as requirements for built-in storage of 19 housing schemes within the District. They comprise of a mix of recently approved housing schemes which are currently under construction or sites which have been recently completed. Of those scheme assessed, 10 applications were Major Sites (10+ dwellings) and with a further 9 being Minor Sites (9 or less dwellings). The development assessed includes schemes across the District within or on the edge of settlements.
- 4.7 The developments (Figure 4) were measured⁷ using the information provided as part of the approved plans, so that a comparison could be made between the measurements set out in the NDSS and the respective applications.
- 4.8 Each application was measured to calculate the Built-in Storage (BiS), Main Bedroom Floor Area (MBA), Double Bedroom Floor Area (DBA), Single Bedroom Floor Area (SBA), Main Bedroom Width (MBW), Double Bedroom Width (DBW) and Single Bedroom Width (SBW). Of the dimensions recorded, the information was used to determine compliance. If the dwellings were not considered to comply, calculations were made as to the volume/amount the dwellings did not comply.

⁶

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/540330/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf

⁷ The measurements have been taken from the electronic versions of the approved plans and there may be a small level of imprecision in the recorded measurements

Figure 4: Sample of approved housing schemes in the district

	Site ⁸	Status as at 1.4.18	Planning Ref	Units
Major Sites				
1	Chitcombe Road, Brede	Completed	RR/2014/2005/P	13
2	Donsmead, Northiam	Completed	RR/2015/545/P	66
3	Galley Hill, Bexhill	Completed	RR/2011/2332/P	65
4	High Street, Etchingham	Completed	RR/2012/2326/P	21
5	Barnhorn Green, Bexhill	Under construction	RR/2015/3115/P	67
6	Land off Pebsham Lane, Bexhill	Under construction	RR/2014/1223/P	108
7	Rear of Woodland Way, Hastings Fringes	Completed	RR/2012/576/P	15
8	St Mary's Lane, Ticehurst	Completed	RR/2005/3151/P	16
9	Udimore Road, Rye	Completed	RR/2015/3074/P	22
10	White Sands, Camber	Completed	RR/2011/300/P	48
Minor Sites				
11	Ashdown Road, Bexhill	Completed	RR/2014/1462/P	3
12	Doleham Cottages, Guestling	Completed	RR/2014/331/P	4
13	Dorset Road, Bexhill	Completed	RR/2013/860/P	5
14	Ewhurst Lane, Northiam	Completed	RR/2014/723/P	2
15	High Street, Etchingham	Completed	RR/2013/841/P	4
16	Little Common Road, Bexhill	Completed	RR/2014/1171/P	6
17	Main Street, Peasmash	Completed	RR/2012/1552/P	4
18	Shrub Lane, Burwash	Completed	RR/2014/1293/P	4
19	Watermill Lane, Bexhill	Completed	RR/2014/1542/P	1

5.0 Findings from the research

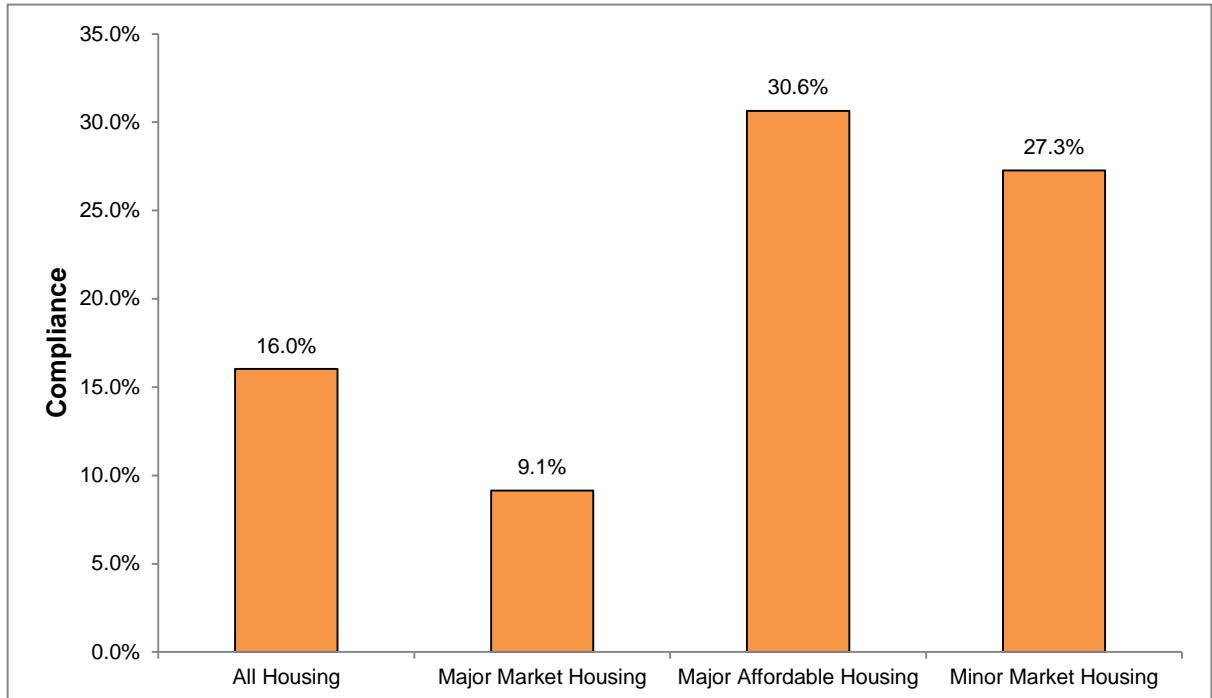
- 5.1 The objectives of the research were to make comparisons between local housing schemes and the nationally described space standards, including:
- Overall Compliance against the NDSS
 - Compliance with the varying components of the NDSS
 - Compliance across different dwelling sizes
 - Compliance comparison between Market Housing and Affordable Housing
 - Compliance comparison between Major Sites and Minor Sites
- 5.2 Through the research it is noted that, in order to implement the Space Standards, plans submitted with planning applications will need to provide more details in respect of:
- Level of detail & dimensions
 - Labelling/identification of spaces

⁸ Many of the approved schemes have not provided section plans during the planning application stage therefore ceiling heights have not been included in the results as the majority of drawings did not include dimensions, sections or details in reference to ceiling heights; however there were no obvious signs of non-compliance when measuring from the approved plans.

Overall Compliance against the NDSS in terms of internal configuration

- 5.3 Overall compliance of the internal configuration within the NDSS fares poorly, with only 16.0% of dwellings being wholly compliant against all internal elements of the NDSS. As Figure 3 shows, market housing developed within minor sites is most compliant, with 27.3% of dwellings being wholly compliant. Compliance in major sites is comparatively worse, with 9.1% of market housing and 30.6% of affordable housing meeting the standard.

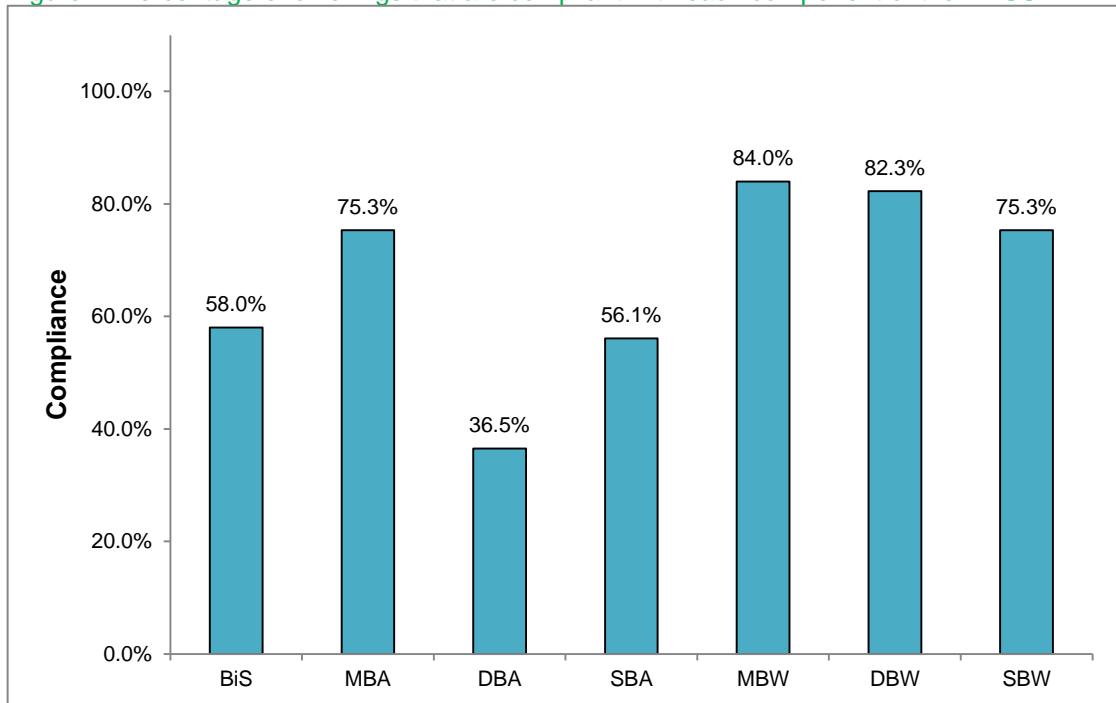
Figure 3. Percentage of dwellings that are wholly compliant with the internal configuration elements of the NDSS



Compliance with the varying components of the NDSS

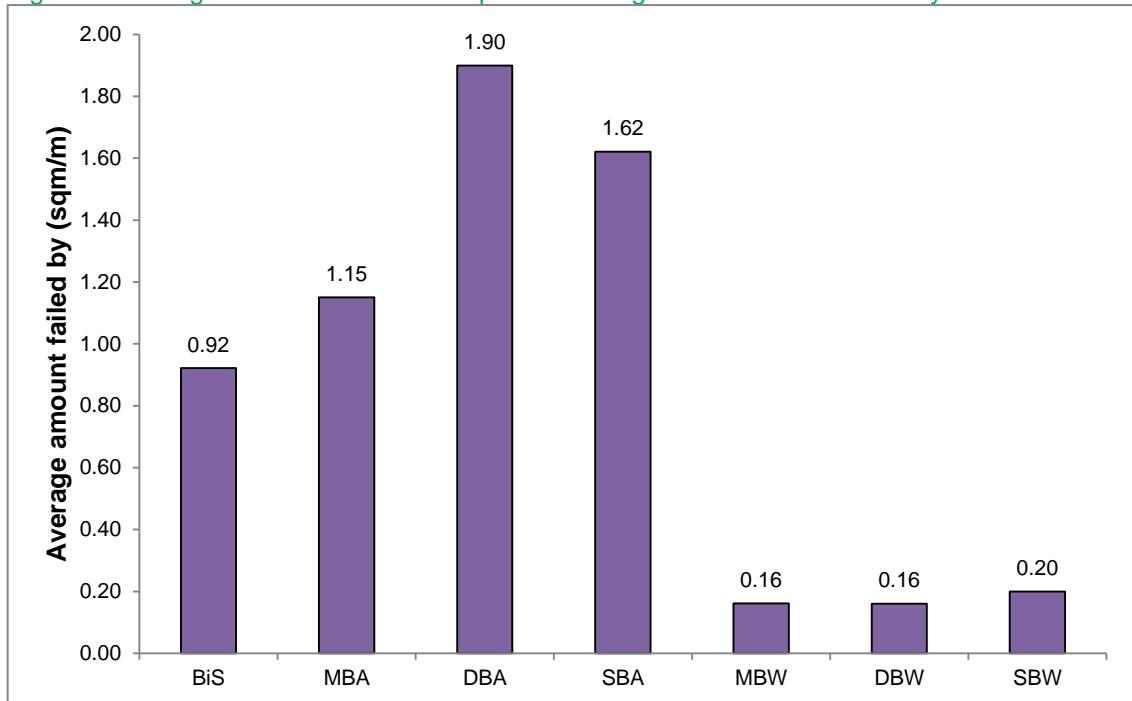
- 5.4 Figure 4 shows that Additional Double Bedroom (ADB) room size (floor area) is the least compliant element of the NDSS, with only 36.5% of dwellings meeting the minimum area of 11.55sqm.

Figure 4. Percentage of dwellings that are compliant with each component of the NDSS⁹



- 5.5 Whilst the headline indicates that the overall compliance against the NDSS appears to be poor, Figure 5 shows that the average amount that non-compliant dwellings actually fail by is relatively small. Generally, compliance against the other requirements of the NDSS is 2 m or 2sq.m or less, meaning that minor internal changes to the layouts would likely result in compliance with the standards.

Figure 5. Average amount that non-compliant dwellings failed each standard by

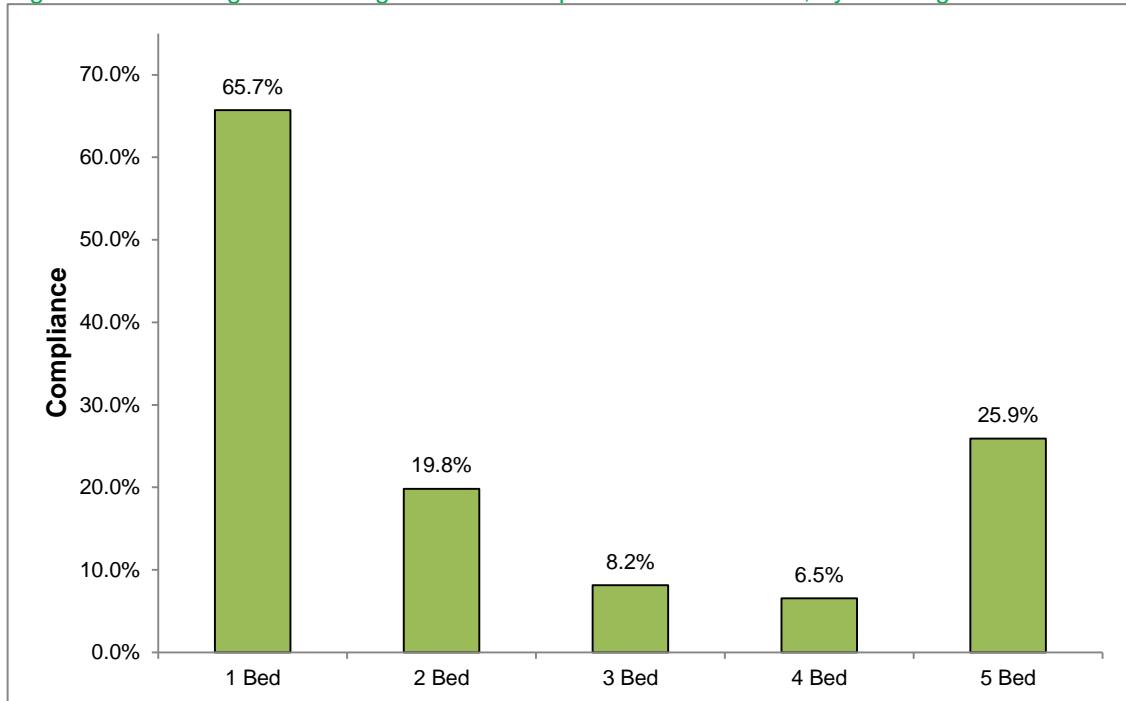


⁹ BiS – Built-in Storage, MBA – Main Bedroom Area, DBA - Double Bedroom Area, SBA, Single Bedroom Area, MBW – Main Bedroom Width, DBW – Double Bedroom Width, SBW – Single Bedroom Width

Compliance across different dwelling sizes

- 5.6 When considering overall compliance across different dwelling sizes (in terms of the number of bedrooms) it can be seen from Figure 6 that 1 bed dwellings are significantly more compliant than larger dwellings, with over 65% of 1-bed dwellings being compliant.

Figure 6. Percentage of dwellings that are compliant with the NDSS, by dwelling size



- 5.7 A more detailed breakdown of compliance across different dwelling sizes against each component part of the NDSS is produced in Figures 7 and 8.
- 5.8 Figure 7 shows that generally 2-bed and 3-bed dwellings are least compliant against the various elements of the NDSS, with 1-bed, 4-bed and 5-bed dwellings showing a much better proportion of compliance against the different elements of the NDSS.
- 5.9 Figure 8 shows the average amount that non-compliant dwellings fail by against the differing elements of the NDSS. There is a similar trend to that seen in Figure 7, where 2-bed and 3-bed dwellings have the highest levels of non-compliance, with 4-beds and 5-beds generally only missing out on meeting the NDSS by relatively small margins. Generally, given that the overall sizes of new dwellings are larger than the overall NDSS, with some reconfiguration the Standards could be accommodated within dwellings.

Figure 7. Percentage of dwellings that are compliant with each part of the NDSS, by dwelling size

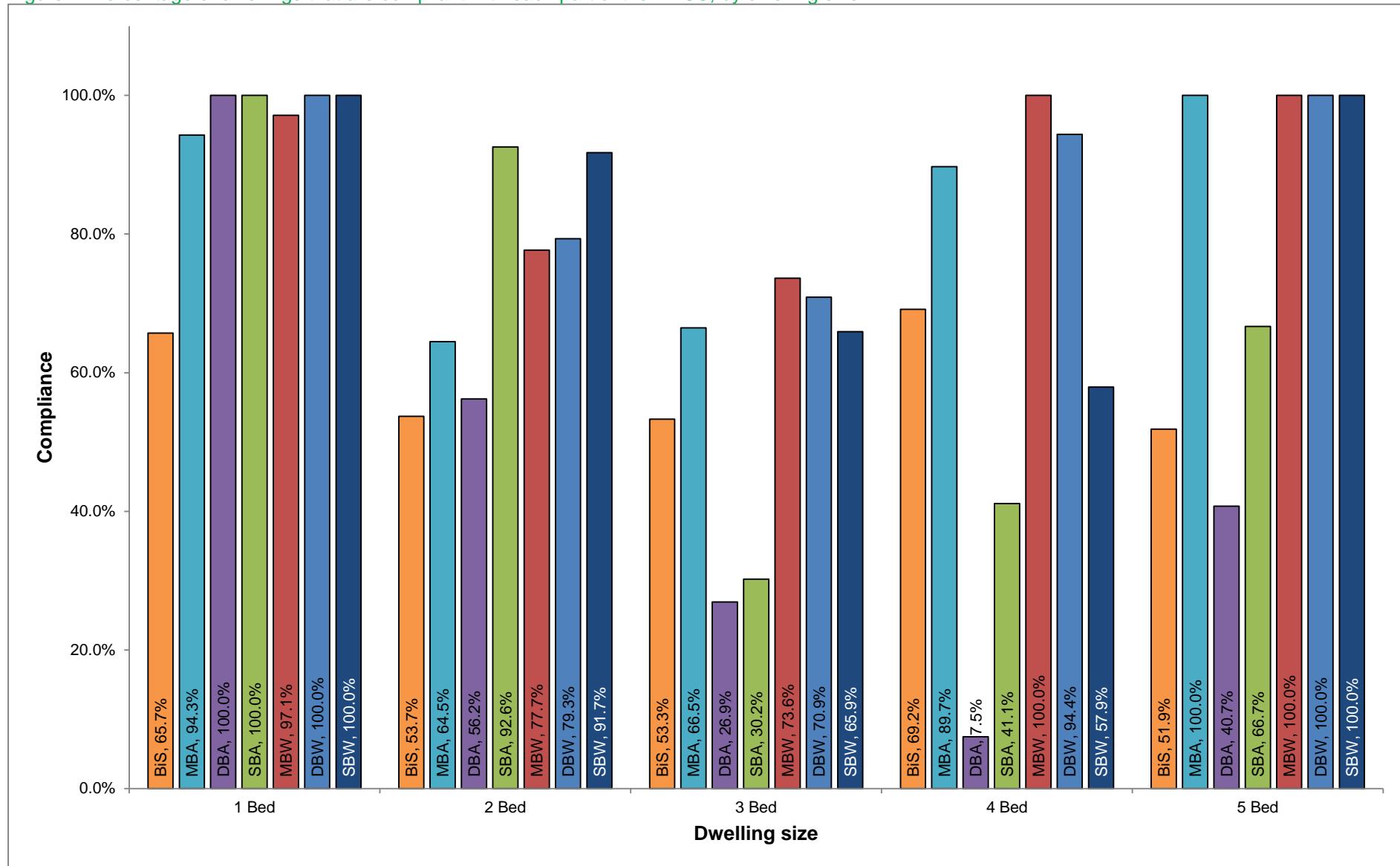
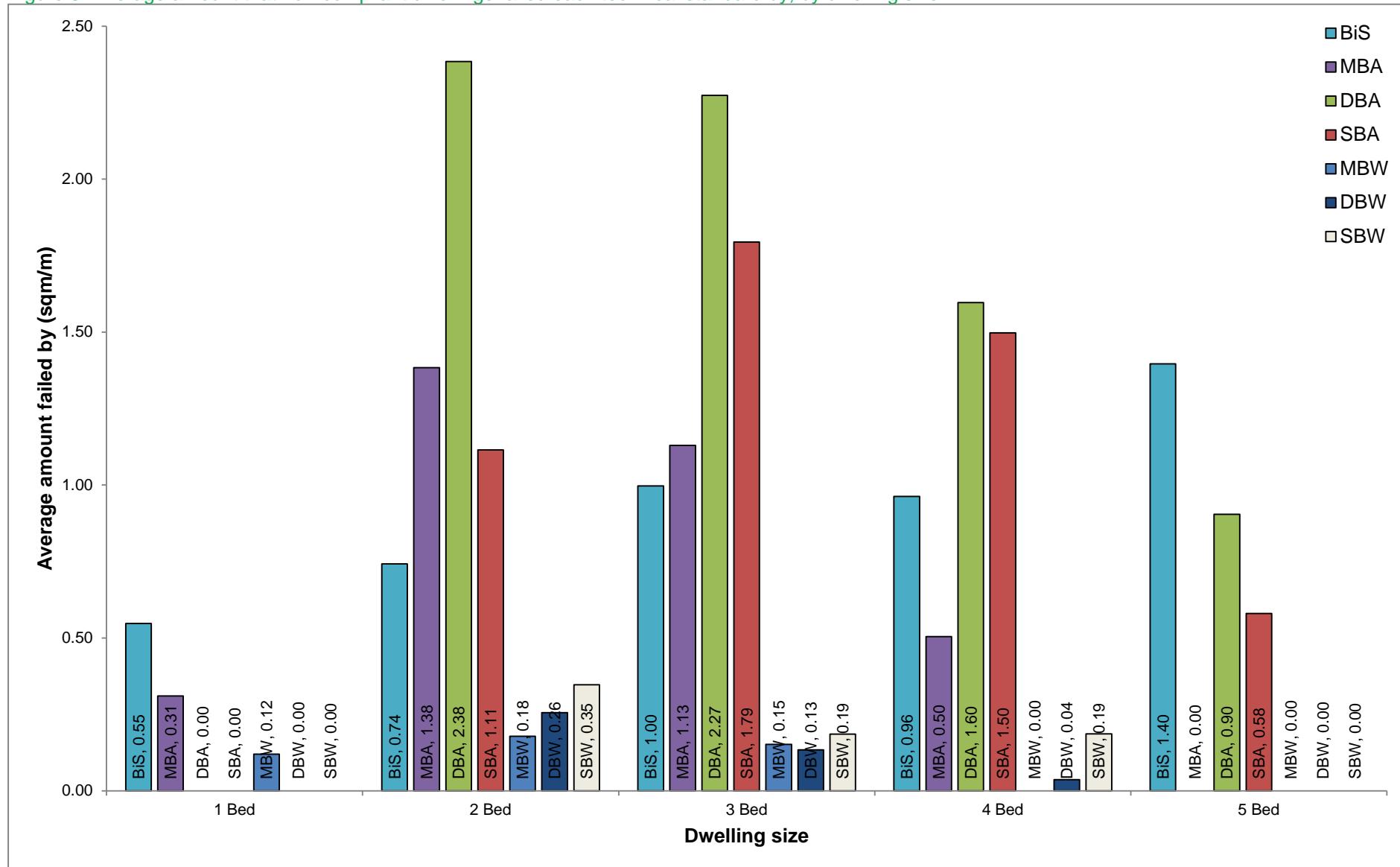


Figure 8. Average amount that non-compliant dwellings failed each technical standard by, by dwelling size



- 5.10 The Main Bedroom Area (MBA) has the largest dimensions in the NDSS calculations and it is useful to analyse the degree to which the MBA fell short of the standards by dwelling size (Figure 9). It shows that with the exception of 5 bed dwellings where the MBA met or exceeded the NDSS, all other dwellings failed by a relatively small amounts. 1 bed and 4 bed dwellings failed by less than 5% and 2 and 3 bed dwellings failed by around 10%.

Figure 9. Percentage Main Bedroom Area's failed by, by dwelling size

1 bed	2 bed	3 bed	4 bed	5 bed
2.5%	12.0%	9.8%	4.3%	0%

Compliance comparison between Market Housing and Affordable Housing

- 5.11 Figure 10 shows the percentage of Market and Affordable Housing dwellings that are compliant against each element of the NDSS and Figure 11 shows the average amount that non-compliant dwellings failed by.
- 5.12 It should be noted that this comparison is only between Major Sites, as there were no Minor Sites that included Affordable Housing.
- 5.13 The graphs clearly show that Market Housing is the least compliant against all elements of the NDSS.
- 5.14 Figure 11 indicates that Market Housing failed by more, on average, than Affordable Housing across all elements of the NDSS except for Double Bedroom Widths.

Figure 10. Percentage of dwellings that are compliant with each part of the NDSS (Major Sites only)

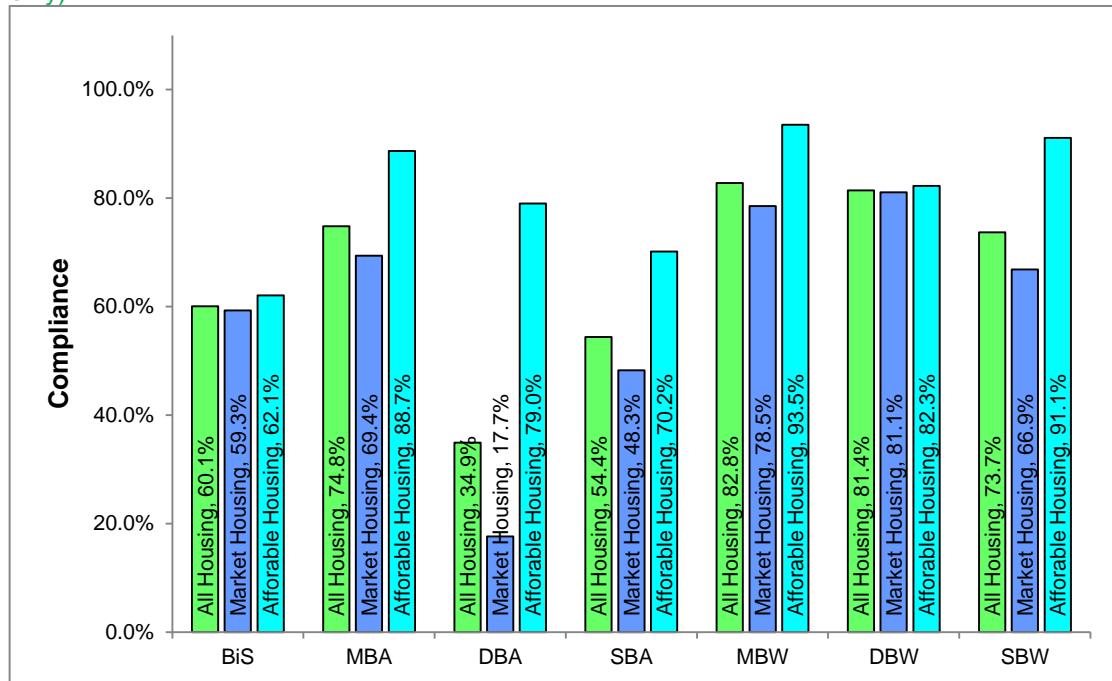
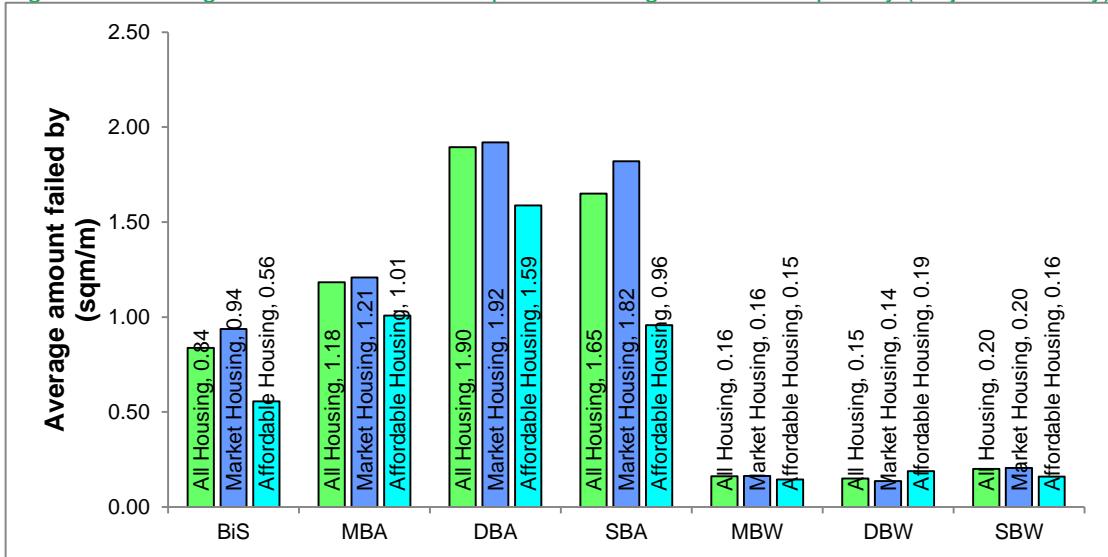


Figure 11. Average amount that non-compliant dwellings failed each part by (Major Sites only)



Compliance comparison between Major Sites and Minor Sites

- 5.15 Figure 12 shows the percentage of dwellings on Major and Minor Sites that are compliant with each element of the NDSS and Figure 13 shows the average amount that non-compliant dwellings failed by.
- 5.16 It should be noted that this comparison is only between Market Housing, as there were no Minor Sites that included Affordable Housing.
- 5.17 Minor Sites appear to be significantly more compliant with each element of the NDSS, except for Built-in Storage, compared to the Major Sites.
- 5.18 Figure 13 shows the average amount that non-compliant dwellings, in both Major and Minor Sites, failed by.

Figure 12. Percentage of dwellings that are compliant with each part of the NDSS (Market only)

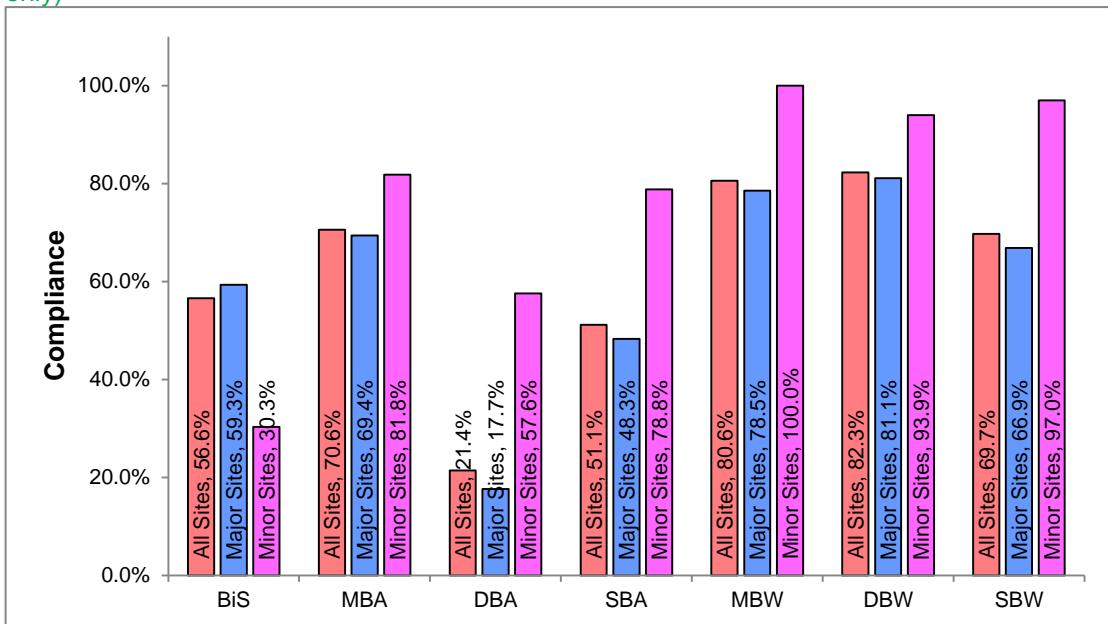
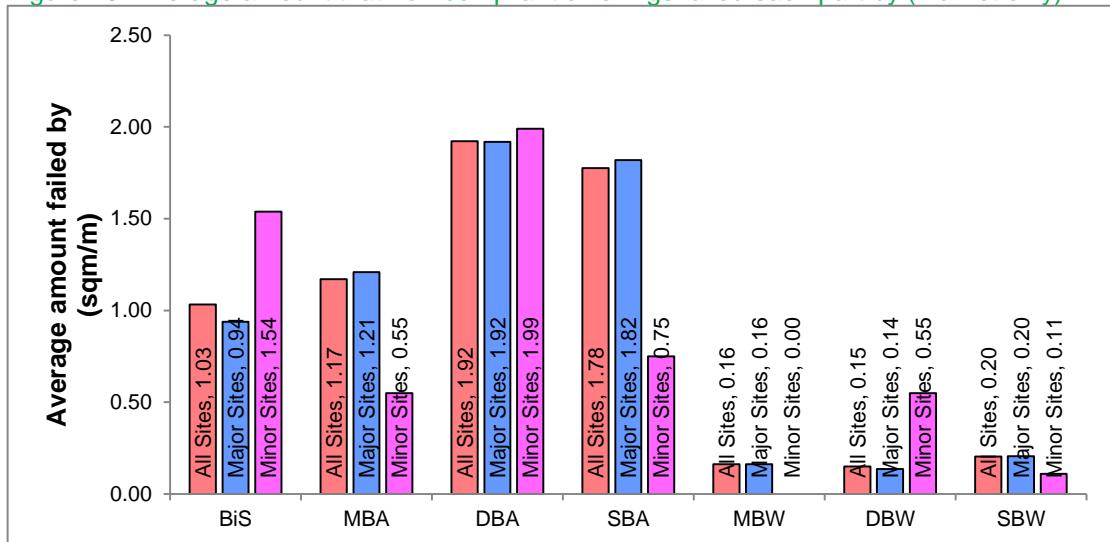


Figure 13. Average amount that non-compliant dwellings failed each part by (Market only)



- 5.19 Overall, the results indicate that dwellings with the District exceed the space standards in terms of Gross Internal Area (GIA), although improvements are needed to ensure developments are compliant with the other elements of the Space Standards. The research shows that many of the measurements are close to the standards and would not require huge adjustments.
- 5.20 Potential developers would need to be made aware that planning applications require more detail than previously. In particular, specifying ceiling heights, built in storage and bed spaces.

6.0 Viability

- 6.1 The Council's Local Plan Viability Assessment (October 2018)¹⁰ provides the evidence to support the policies within the adopted Core Strategy (2014) and the Proposed Submission DaSA, combined with the Community Infrastructure Levy (CIL) requirements.
- 6.2 The Assessment indicates that the inclusion of a planning policy requiring all new dwellings to comply with the NDSS would not have an adverse impact on the viability of sites coming forward.

7.0 Timing

- 7.1 With reference to the timing of introduction of the Optional Technical Standard, the PPG suggests that a transitional period may be required following adoption of such a standard to enable any additional costs to be considered within land acquisitions.

¹⁰ www.rother.gov.uk/background-evidence/other

- 7.2 The development industry (developers, landowners and planning agents/consultants) who are active within the District have been aware of the Council's intention to introduce minimum internal space standards for some time. Not only were a large number of developers directly consulted on the Issues and Preferred Options stage of plan-making, but a number of agents and developers responded to consultations. All stages of plan-making for the emerging DaSA have included questions or policies pertaining to the Council's intention to introduce the internal space standards within the District.
- 7.3 However, the Council recognises that for some developments space standards may have an impact. For this reason the Council has been proactive in highlighting space standards at pre application meetings for residential development.
- 7.4 Whilst the optional national space standard is not used at this stage by the Council to refuse planning applications which do not meet the standard, it is proving to be a helpful indicator for both planning officers and developers in terms of design and layout of schemes at pre-application stage. As such the Council does not consider it necessary to provide any transitional arrangements regarding the proposed space standards policy.

8.0 Conclusion

- 8.1 The results indicate that, generally, dwellings within the district are larger than the minima set out the NDSS, although improvements are needed to ensure developments are wholly compliant with the Standards. The research indicates that there is a low overall compliance NDSS measurements in terms of the internal configuration of dwellings. However, it is clear that without huge adjustments, minor amendments could be made to the internal layouts to achieve compliance. Therefore it is imperative that the Standards are taken into account at the design stage. The Rother Local Plan Viability Assessment indicates that the introduction of the policy would have a minimal impact on viability.
- 8.2 In order to demonstrate compliance with the NDSS, potential developers will need to provide more detailed information as part of planning applications than previously accepted by the Council. In particular, specifying ceiling heights, built-in storage and number of bed spaces in order to demonstrate compliance. These requirements would need to be made explicit within the Council's Validation checklist.
- 8.3 Minor internal layout changes to a number of the schemes considered to allow more room for built-in storage and taking a small amount of floorspace from rooms not covered by the standards (bathrooms, lounges, dining rooms or kitchens), would likely result in more dwellings complying with the NDSS.

- 8.4 The research has also indicated that by re-designating non-compliant Double Bedrooms to Single Bedrooms, thus reducing the bed spaces and the GIA requirements, even more dwellings would be compliant with the NDSS. This does mean fewer occupants per household, however it would improve housing quality, help eliminate ‘box rooms’ and ensure buyers get more value for money. This would improve buyers/renters confidence and compliance can be used as a marketing tool. It should be noted that the number of bed spaces is a means of classification for assessment purposes during the planning process only. It would not imply actual occupancy.