

National Space Standards

Assessing the Impact of Adopting Space Standards

On behalf of **Plymouth City Council**



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1 Introduction

1.1 Introduction

- 1.1.1 Plymouth City Council (the Council) has appointed Peter Brett Associates LLP (PBA) to provide advice on the impact of adopting the minimum national space standards (NSS) and Building Regulation Part M Category 2 and 3 (referred to here as the 'local access standards') on future housing delivery if adopted as local standards.
- 1.1.2 The results of this study will inform the development of relevant policies in the emerging Plymouth Plan and guide the consideration of any future planning applications for housing.

1.2 Study Purpose

- 1.2.1 This study assesses the density, cost and impact on future housing delivery in Plymouth from imposing the NSS as a local standard. This includes:
- Reviewing and calculating the size of dwellings built over recent years based on housing units with 20 sites provided by the Council;
 - Assessing the impacts of adopting the space standards on the:
 - Density of future developments;
 - Viability on the sampled developments; and
 - Plymouth's 5 year land supply calculation.
 - Benchmarking the assessment against existing/emerging approaches by other local authorities.

Report structure

- 1.2.2 **Chapter 2** sets out the national policy framework relating to the housing space standards, and Plymouth's proposed policies for introducing these standards locally. **Chapter 3** outlines the PBA method for assessing the impact of using the space standards as a local standard. Finally, **Chapters 4** provides the results.

2 Policy Framework

2.1 Introduction

- 2.1.1 On 27 March 2015 the government announced a new approach to the setting of technical housing standards in England. This was accompanied by the publication of a new set of streamlined national technical standards, which came into effect on the 1st October 2015.
- 2.1.2 The standards is one part of a wider housing standard review package which the government announced in a Ministerial Statement¹, setting out that new homes need to be high quality, accessible and sustainable. Though not mandatory, Government expect that these standards will replace existing locally-produced standards and local authorities can require compliance with the standards within Local Plan policies.
- 2.1.3 Government's new approach for setting technical standards for housing aims to rationalise existing standards, providing a simple system to help bring forward more new homes. The new national space standards are to complement the existing set of Building Regulations.

2.2 National Planning Policy Framework

- 2.2.1 National Planning Policy Framework (NPPF) sets out that local authorities should set out policy on local standards in the Local Plan, as set out in below. It also highlights the importance of ensuring that standards do not put the implementation of the plan at 'serious risk' by imposing standards which make development unviable.

*'Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence.'*²

- 2.2.2 NPPF confirms that local authorities need to understand the costs of local standard requirements when producing Local Plans.

*'... it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up....local standards requirements that may be applied to development should be assessed at the plan-making stage, where possible, and kept under review.'*³

2.3 National Space Standards for Housing

- 2.3.1 Government published 'Technical Housing Standards – Nationally Described Space Standard' (NSS) in March 2015. This replaces the existing variety of space standards used by different local authorities. It is not a building regulation and remains solely within the planning system as a new form of technical planning standard.

¹ Written Ministerial Statement – The Rt Hon Eric Pickles March 2015 'Steps the government are taking to streamline the planning system, protect the environment, support economic growth and assist locally-led decision making'

² National Planning Policy Framework (2012), Para. 174

³ Ibid (Para. 177)

2.3.2 NSS deals with the internal space of new dwellings and sets out the requirement for Gross Internal Area, as set out in **Table 2.1**.

Table 2.1 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) ²			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; CLG (March 2015)

2.3.3 GIA is defined as the total floor space measured between the internal faces of perimeter walls. The standard is organised by number of bedrooms; number of bed spaces; number of storeys and provides an area for built-in storage.

2.3.4 DCLG have confirmed to PBA that the storage areas identified above is already included within the GIA in the above table.

2.3.5 NSS states that GIA *'will not be adequate for wheelchair housing (Category 3 homes in Part M of the Building Regulations) where additional internal area is required to accommodate increased circulation and functionality to meet the needs of wheelchair households.'*⁴

2.4 Part M Building Regulations M4(2) and (3)

2.4.1 New requirements under the Part M Building Regulations 2010 were brought in at the same time, in October 2015. The main changes were replacing requirement M4 'Sanitary conveniences in dwellings' with:

- M4(1) Category 1: Visitable dwellings;
- M4(2) Category 2: Accessible and adaptable dwellings; and

⁴ Para. 9, Technical Housing Standards, CLG (March 2015)

- M4(3) Category 3: Wheelchair user dwellings.

2.4.2 The Approved Document Part M sets out detailed technical specifications relating to each of the categories 1 – 3. However, it does not provide any detail on the minimum internal floor areas.

Illustrative Technical Standards Developed by the Working Groups

2.4.3 In developing the Housing Standards Review national Government undertook a detailed questionnaire and evidence base within the 'Illustrative Technical Standards' which were developed by the Working Groups and published August 2013. This review looked at Accessibility Standards, which relates to Part M of the Building Regulations (Category 1, 2 and 3). These internal floor areas do not appear in published document following the consultation. However, there appear to be no other sources of information which provide the size of different dwelling types.

2.4.4 These measurements have been used for the purpose of this study.

2.5 Housing Standards Review Cost Impacts

2.5.1 A 'Housing Standards Review – Cost Impacts' was undertaken in September 2014 by EC Harris LLP, on behalf of DCLG. This report summarised costs relating to the current and proposed changes in housing standards. Separate to the increase in floorspace, the report identifies a number of additional cost implications relating to required changes in design (i.e. ceiling structure, ground level bathrooms etc) associated with improving access.

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2.5.3 Table 45 of the EC Harris report provides a cost per type of dwelling (i.e. 1 bed apartment, 2 bed terrace). For the purpose of this report we have used an average figure for flatted development and an average for housing, to meet both Category 2 and Category 3 Accessible standards. The figures below are used:

- Cat 2 - £521 per house
- Cat 2 - £924 per flat
- Cat 3 - £22,694 per house
- Cat 3 - £7,906 per flat

2.5.4 Source: EC Harris on behalf of DCLG, (2014). Housing Standards Review, Cost Impacts. September 2014.

2.6 Local planning policy

2.6.1 Currently the Plymouth Core Strategy requires that schemes with five or more units to include 20% at Lifetime Homes standard (i.e. the new Category 2), reflected across all tenure and therefore these should have been achieved within the sample scheme. Also, the Plymouth Plan includes a new policy that schemes with 25 or more units will include 4% at wheelchair living standard (the new Category 3). This study tests the impact of these local access standards policies on the viability of five sample sites.

2.6.2 Plymouth Plan sets out the level of affordable housing at 30% for sites of ten or more units. The policy sets out ambitions for types, and standards, for housing to be developed.

Size and tenure of affordable housing should reflect normal open market housing. Providing a mix of housing sizes, types and tenures appropriate to neighbourhood. This study has not included affordable housing policy levels within the viability testing. However, it should be noted that this would be an extra policy cost to developers.

- 2.6.3 There are also costs associated with Policy 25 'Reducing carbon emissions and adapting to climate change' but these costs are currently unknown. These policy costs will be tested within the Local Plan/CIL viability testing project following this study.

3 Our Approach

3.1 Introduction

3.1.1 The purpose of the project was to assess the cost and impact on future housing delivery in Plymouth from imposing the minimum NSS and Building Regulation Part M Category 2 and 3 standards. The approach undertaken by PBA to undertake this work for Plymouth is set out in the stages below.

3.2 Stage 1 Review current new dwelling space in Plymouth

3.2.1 **Stage 1** reviewed the space standards currently being permitted for housing units in Plymouth.

3.2.2 The Council provided PBA with a list of 24 sites across Plymouth with planning permission in order to identify the average Gross Internal Area for each 1, 2, 3 and 4+ bed property, and different storey numbers. This took into account parts of homes that are identified for storage and treats this as part of the GIA. It also identified the number of people for each dwelling type to enable a comparison with the minimum NSS standards. The work involved obtaining planning application documents and other details which provided this information. However, four of the sample sites had to be excluded because one site had no measurements for persons, one site was for student accommodation and two sites had a shortage of information to derive accurate calculations. The remaining sample of 20 sites that informed this study are listed in **Table 3.1**.

Table 3.1 Sites tested within study

Application ref	No. Units	Site name	Tenure
12/01867/FUL	23	Duke St./Curtis St.	???
11/00149/FUL	12	Land off Cundy Close	100% OM
12/02082/FUL	16	27 Springfield Close, and land to rear	Mixed
14/00128/FUL	12	Former Plymouth Preparatory school, Beechfield Grove	100% OM
11/00238/FUL	14	3 to 5 Market Road	100% OM
14/00525/FUL	14	The Cornwall Gate, 71 Normandy way	100% OM
14/01304/FUL	14	Land off Dover Road	100% AH
13/01984/FUL	19	Former PLUSS site, 271 Clifford Road	100% AH
13/00688/FUL	102	Plot A1 Millbay Development	Mixed
13/00941/REM	1334 total	Plymstock Quarry, Broxton Drive	Mixed
10/02026/FUL	148	North Prospect Scheme Woodhey Road Phase 1a	Mixed
12/01304/FUL	347	Woodville Road, Plymouth, Phase 2	Mixed
12/00898/REM	175	Former Runway Plymouth City Airport	100% OM
13/00048/FUL	208	Land East and West of Pennycross Close	Mixed
12/1584/REM	94	Unity Park, Efford Road	Mixed
14/02107/FUL	190	Former Hooe Lake Quarry, Land off Barton Road	Mixed
13/01293/FUL	77	Former Civil Service Sports Club, Recreation Rd	Mixed
14/01780/FUL	101	Land at Granby Green, West of Park Avenue	Mixed
09/01708/FUL	47	South Trelawny Primary school, Jedburgh Cres	100% AH
13/01786/FUL	50	Former Plym View School, Efford	Mixed

3.3 Stage 2 Comparison of space standards to permitted dwellings

- 3.3.1 The results of **Stage 1** were then compared with the minimum NSS, as set out in **Table 2.1** in **Chapter 2**, to assess if permitted schemes in Plymouth are meeting the NSS, or not. For each housing size/number of people, the findings in **Table 3.2** were identified for each site, to identify differences in permitted floorspace and the NSS minimum floorspace:

Table 3.2 Method for comparing the minimum NSS with permitted dwellings in Plymouth

Method to compare the minimum NSS with permitted dwellings
Required GIA (including storage) is less than the permitted GIA.
Required GIA (including storage) would be greater (up to 5sqm) than the permitted GIA.
Required GIA (including storage) would be greater (5sqm +) than the permitted GIA.

3.4 Stage 3 Assessing impact of space standards on development viability

- 3.4.1 This stage identified the impact on build costs viability across a sample of site typologies used for testing local plan policies and CIL. These typologies are identified in the Plymouth Local Plan and CIL Viability Assessment (Dec 2015) report. For this, PBA undertook a residual value viability appraisal of the site typologies using the same assumptions as set out in **Section 5** of the Plymouth Local Plan and CIL (Dec 2015) report. The approach to assessing the scheme viability is in accordance with RICS Best Practice.
- 3.4.2 The PBA viability appraisal was run three separate times for each site to allow for changes in floorspace and build cost in meeting the local policy requirements for:
- Minimum NSS;
 - Category M2 (Accessible and adaptable dwellings); and
 - Category M3 (Wheelchair user dwellings), with allowance for any additional costs that have been identified in the DCLG report.
- 3.4.3 In testing viability of the local policy requirements on NSS and local access standards, a number of assumptions within the PBA viability Model had to be adjusted based on the following approaches:
- An assumption that the Category 1 dwelling sizes (in the Illustrative Technical Standards) led to the finalised NSS adopted minimum space standards. For the purposes of the study, the percentage increase in unit sizes from Cat 1 to Cat 2; and then from Cat 1 to Cat 3 was calculated taken from the draft Illustrative figures. The percentage increases were then applied to the NSS standards to provide space standards for dwellings built to Cat 2 and 3.
 - As discussed in **Chapter 2**, the extra over build costs for Category 2 and 3 homes were identified using the DCLG Housing Standards Review Cost Impacts (Sept 2014) report, and BCIS median average build costs were adjusted to reflect extra over cost for meeting each required standard in each of the sample sites. We have applied these costs to the appraisal.

3.4.4 PBA also sought to identify if the increased housing sizes and local access standards would increase the achievable sales values for the properties, which might affect their viability. This would also enable us to identify whether the affordability of buying housing with Plymouth would change by introducing this new policy, which is one of the tests set by the NPPF in assessing the impact of new planning policies. We reviewed this by speaking with residential estate agents in who are active across Plymouth to identify if they felt that buyers would be likely to spend more for these properties.

3.5 Stage 4 Impacts of space standards on Plymouth’s 5 year land supply

3.5.1 To illustrate the implications of the minimum NSS and local access standards on the future delivery of residential units within Plymouth, we considered the implication of increased floorspace on the number of units that would be achievable within a shortened sample of five sites from the 20 sites. These five were identified by Plymouth and are identified in **Table 3.3**.

Table 3.3 Further sites tested identified by the Council

Value area sites:	Small site (<25 units)	Large site (>c.100 units)
Low	Duke St/Curtis St (23 units)	Unity Park (94 units)
High	Springfield Close (16 units)	Hooe Lake (190 units)
Medium high value flatted development		Millbay Plot A1 (102 units)

3.5.2 Densities were compared for the sample sites based on their achieved sizes and likely sizes and if they were to follow the new minimum NSS and the local access standards policy. The impact on the 5 year land supply has then been assessed by applying this proportional change to all sites in the SHLAA.

3.5.3 For identifying the density, tests were undertaken using the design studies for the shortened sample of site. To clarify the likely difference in what can be delivered in terms of site densities, this exercise used the same parameters (i.e. same amount of external areas including garden and parking space, and any open spaces) as those already developed, and the same proportions of different types of housing.

3.6 Stage 5 Review of other approaches to space standards

3.6.1 In benchmarking we have researched other local authorities and other relevant evidence for impact assessment for the identified costs standards.

4 Results

4.1 Introduction

4.1.1 The purpose of the project was to assess the cost and impact on future housing delivery in Plymouth from imposing the minimum NSS and Building Regulations Part M Category 2 and 3 standards. The results of the study are set out below.

4.2 Stage 1 Review current new dwelling spaces in Plymouth

4.2.1 For 20 sites across Plymouth, which have planning permission for housing, PBA identified the average Gross Internal Area (GIA) for each 1, 2, 3, 4 and 5 bed properties (along with different storey numbers) currently being delivered in each site. The results for these sites are set out in **Appendix A**. This includes the total GIA for each dwelling size (number of bedrooms/people).

4.3 Stage 2 Comparison of space standards to permitted dwellings

4.3.1 The results of **Stage 1** were then compared with the minimum NSS, as set out in **Appendix B**.

4.3.2 The results identified that a large proportion of the 2 bed and 3 bed houses currently being delivered in Plymouth are built below the minimum NSS. This includes more than a third of the 2 bed and half the 3 bed dwelling types being built at more than 5 sqm under minimum NSS. **Table 4.1** sets out the percentage of each dwelling types which are smaller than the minimum NSS by 5 sqm or more.

Table 4.1 Dwelling types which are 5+ sqm smaller than NSS

Dwelling type permitted in Plymouth sample sites	No of different dwelling types	Total no. smaller than NSS by at least 5 sqm	% of dwelling types smaller than NSS by at least 5 sqm
1 bed	14	2	14%
2 bed	54	21	39%
3 bed	64	36	56%
4 & 5 bed	44	5	11%

4.3.3 Flats and larger properties are closer to the minimum NSS, with 64% of dwelling types permitted in Plymouth being larger than the minimum NSS, while remainder of dwelling types are under the minimum NSS, but within 5 sqm of the standards. This is likely to reflect the up market nature of new flats being built in Plymouth, particularly along the coastal edge

Table 4.2 Dwelling types which are 5+ sqm larger than NSS

Dwelling type permitted in Plymouth sample sites	No of different dwelling types	Total no. larger than NSS by at least 5 sqm	% of dwelling types larger than NSS by at least 5 sqm
1 bed	14	9	64%
2 bed	54	18	33%
3 bed	64	14	22%
4 & 5 bed	44	22	50%

4.4 Stage 3 Assessing impact of space standards on development viability

4.4.1 This stage identified the potential impact on viability by introducing the NSS and local access standards within Plymouth. The viability results to identify the headroom available for each site typology, within three value areas (Low, Mid and High), based on dwelling sizes.

4.4.2 In order to separate the viability impact of NSS and the local access standards no other policies (including affordable housing) are applied, except for an assumed £2k per unit S106 to cover site mitigation on scheme with 11 or more units.

4.4.3 The identified headroom available for each site is reported in **Table 4.3**, based on dwelling sizes taken from:

- The planning permission permitted for the site;
- Minimum National Space Standards;
- Local access standards for the proportion of units required to meet Building Regulations Part M Category 2 and Category 3.

Table 4.3 Headroom (per sqm) results for all space standards

Value area	Headroom with sizes as built	Headroom with size to minimum space standards	Headroom with size to space standards + emerging access standards
Headroom per sqm			
All areas	£285	£267	£239
High value areas	£422	£404	£383
Mid value areas	£360	£340	£307
Low value areas	£73	£57	£27
Policy cost per sqm			
All areas		-£18.12	-£45.84
High value areas		-£18.44	-£39.10
Mid value areas		-£20.07	-£52.48
Low value areas		-£15.84	-£45.96
Policy cost per average 3 bed dwelling (c.91 sqm) as currently built in Plymouth			
All areas		-£1,649	-£4,172
High value areas		-£1,678	-£3,558
Mid value areas		-£1,827	-£4,775
Low value areas		-£1,442	-£4,182

- 4.4.4 **Table 4.4** shows that across all areas of Plymouth, the average cost for introducing a policy requiring dwellings to be built to the minimum NSS or higher is some £18 per sqm. Therefore the average 3 bed unit of about 91 sqm, as currently built in Plymouth, would have an additional cost would be about £1,650 per unit. Across three value area, this additional cost would range from about £1,440 to £1,830.
- 4.4.5 **Table 4.4** also shows that across all areas of Plymouth, the average cost for introducing the complete NSS and access standards policy is some £46 per sqm across the whole scheme. Therefore the average 3 bed unit of about 91 sqm within a typical scheme, as currently built in Plymouth, the additional cost would be about £4,200. Across three value area, this additional cost would range from about £3,550 to £4,800.
- 4.4.6 PBA undertook telephone consultations with local estate agents who are active across Plymouth. They confirmed that any increase in house size that resulted from the NSS or local access standards, where a dwelling retained the same number of bedrooms, would not increase the sales value of a property in Plymouth. An increase in sales values would only increase with an extra bedroom or other room within the same property. Based on this, it is concluded that increasing the size of properties would not have an impact on the affordability of open market housing in the city because of the price inelasticity based on unit size and number of beds.

4.5 Stage 4 Impacts of space standards on Plymouth's 5 year land supply

- 4.5.1 Impacts of the minimum NSS was assessed on the density of sites for the five sample sites in Plymouth used in **Stage 3**, and the impact this would have on Plymouth's 5 year land supply.

Impact on site density

- 4.5.2 A comparison was made between the actual footprint of each dwelling in the five sample schemes against the required footprint informed by the minimum NSS. The difference in footprint for each dwelling size (for each site) is identified in **Appendix D**.
- 4.5.3 **Appendix E** shows plans for each site, identifying which units need to change.
- 4.5.4 **Table 4.5** shows the total number of units 'as planned' compared to the number of units should the minimum NSS sizes and everything else remain equal, i.e. the same amount of external areas including garden and parking space, and any open spaces. Four of the five sites would have a reduction in units with each of those schemes. Only one of the five sites (Springfield Close) has planned more dwellings at sizes than the minimum NSS, which would therefore result in no loss of dwelling density.

Table 4.4 Impact on densities using minimum NSS

Site name	Gross site area (ha)	Total units		Density		Density Change
		As planned	With NSS	As planned	With NSS	
Millbay	0.8	102	99	127.5	123.8	-2.9%
Unity Park	2.3	94	90	40.9	39.1	-4.3%
Hooe Lake	7.31	189	187	25.9	25.6	-1.1%
Springfield Close	1.22	16	16	13.1	13.1	0.0%
Duke St Curtis St	0.29	23	22	79.3	75.9	-4.3%
Overall	11.92	424	414	35.6	34.7	-2.4%

4.5.5 Where the total number of units has reduced, using the minimum NSS, the sites have seen a density change of ranging between -1.1% to -4.3% depending on scheme.

4.5.6 The overall density change for all sample sites within Plymouth is -2.4%.

Impact on 5 year land supply

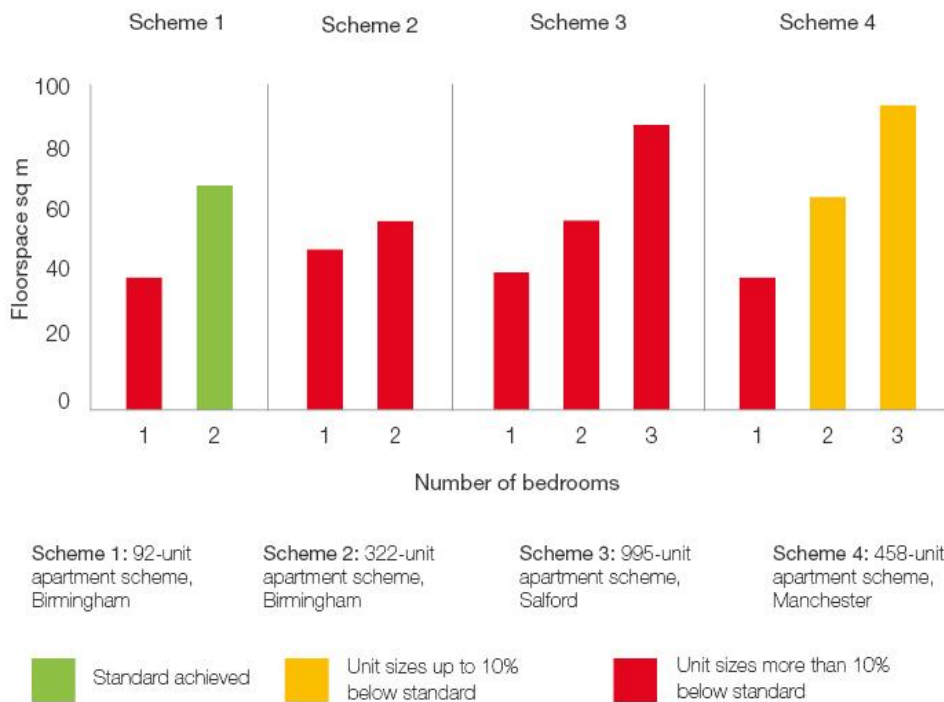
4.5.7 The Draft Plymouth Plan (2011-2031) identifies a housing need of 22,766 new dwellings over the life of the plan to support Plymouth’s growth agenda. The 5 year land requirement is 5,750 new homes.

4.5.8 A -2.4% reduction on the density of sites across Plymouth, from applying the minimum NSS, would reduce the 5 year land supply to 5,612, which is a reduction of 138 dwellings.

Turley’s research

4.5.9 In May 2015, Turley concluded that that the application of the new Standards would have the greatest impact on apartment-led residential developments. Turley undertook research on city centre residential which had recently received planning permission, to establish the extent to which the Standards are already being achieved.

Figure 4.1 Turley research results on city centre residential schemes



Source: Turley website (May 2015)

4.5.10 In the Turley example, the variation in sizes ranged from 4% to 14% below the minimum NSS. In a 458 unit scheme in Manchester, their research estimated that the scheme which is compliant with the Standards would need to accommodate the equivalent of 20 fewer 2 bed units. This raises questions about the impact on viability of the development.

4.5.11 Turley makes a number of conclusions, which is worth considering and comparing with the assessment in Plymouth:

- 'It is likely that the Standards will present the biggest challenge to city centre residential schemes and their viability. These are locations where people more able to exercise choice in the market decide to live to be close to services, employment and transport links. Space may be a secondary consideration for such occupants, reflected in the products coming to market. Developing at high density also encourages innovative design, the driver of which could be lost if set space standards need to be achieved for all properties.
- Many purpose-built Private Rented Sector (PRS) schemes include substantial communal areas. It will be necessary to consider how this is factored into space standards when applied to individual developments.
- For many private rented tenants living in shared dwellings, the size of individual bedrooms will be more important than the size of the shared living space. However, the need to comply with the Standards could drive developers to reduce bedroom sizes (from double to single rooms) such that the overall space requirement for the dwelling is reduced. This is a potential unintended consequence of the Standards arising from linking bedroom size to the number of occupants.
- Full adherence to the standards may also be a challenge when dealing with the conversion of listed buildings. In such cases, the scope to make internal alterations to the building to achieve the Standards may be limited.
- This reinforces the need for the Standards to be applied flexibly having regard to the likely occupancy profile of a development and wider considerations relevant to the achievement of viable and sustainable developments.'⁵

Recommendations to reduce impact on densities and 5 year land supply

4.5.12 Recommendations for housing developments:

- Loose garden space; and
- Loose open space.

4.5.13 Recommendations for mixed use developments:

- Loose garden space;
- Loose open space; and
- Flats – build-up.

4.6 Stage 5 Review of other approaches to space standards

RIBA – Space Standards for Homes

4.6.1 The RIBA published the results of their research 'Space Standards for Homes' in December 2015. This involved measuring the size of new homes on over 100 developments under construction from the 10 largest housebuilders.

4.6.2 The report provides the following results:

⁵ Turley website (15 May 2015)

- Outside of London, the study found that the average new three bedroom home is 4 sqm smaller than the new standard – equivalent to the size of a bathroom;
- The average 3 bedroom home in London is now 25 sqm bigger than in Yorkshire – equivalent to the size of a double bedroom and a family living room; and
- More than half of the new homes being built are not big enough to meet the standards.

4.6.3 The report identifies the average size of a 3 bed new home for each region. In the south west the average size is 88.7 sqm which is 95% of the recommended minimum size in the NSS.

Figure 4.2 Average dwelling sizes being achieved within English regions

	2015			2011
	Size of average 3 bed new home (sqm)	Difference against recommended size (93 sqm)	% of recommended minimum	Size of average 3 bed new home (sqm)
North West	87.3	-5.7	94%	84
East Midlands	86.9	-6.1	93%	87
South East	93.9	0.9	101%	96
Yorkshire and Humber	84	-9	90%	83
West Midlands	85.7	-7.3	92%	94
London	108.5	15.5	117%	119
East of England	93.5	0.5	101%	88
North East	85.4	-7.6	92%	89
South West	88.7	-4.3	95%	87
Total	91	-2	98%	88
Total excluding London	88.9	-4.1		

Figure 4.2: Average dwelling sizes being achieved within English regions

4.6.4 The report suggests that the requirement on Local Planning Authorities to introduce the space standards through the Local Plan is too onerous and complex. The RIBA suggest that the NSS should be embedded in Building Regulations.

London Plan Statement

4.6.5 In May 2015, the Mayor of London published a statement setting out how the existing policies relating to the Housing Standards in the London Plan should be applied from October 2015.

4.6.6 The statement makes the following changes to the London Plan policies:

- Policy 3.5: Minimum standards provided within the London Plan are to be replaced by Table 1 of the nationally described space standards. The original policy is not a requirement of development, and the policy states that '*boroughs should seek to ensure that new development reflects these standards*'.
- Policy 3.8: From October 2015, 10% of new housing are required to meet building regulation M4 (3) 'wheelchair user dwellings'.

- 4.6.7 The London Plan Statement does not provide any analysis of viability for the change in policy, but it is assumed that boroughs will take on board the testing of viability.
- 4.6.8 London Plan has associated SPG standards. The statement sets out the existing standard against the standard from October 2015 based on the nearest equivalent national technical standard. These relate to specific/detailed measurements

London Borough of Richmond Upon Thames

- 4.6.9 London Borough of Richmond Upon Thames sets out policy from 1 October 2015:
- All new housing to meet nationally described space standards;
 - 90% of all new housing to meet Building Regulation Requirement M4 (2) 'accessible and adaptable dwellings'; and
 - 10% of all new housing to meet Building Regulation Requirement M4 (3) 'wheelchair user dwellings.'

Appendix A Current dwelling sizes being permitted in Plymouth

Appendix B Plymouth achieved dwelling sizes compared to minimum NSS

