

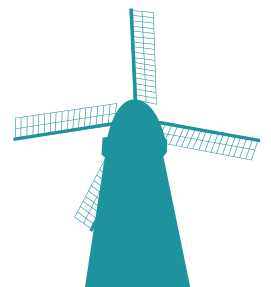
Eastleigh Borough Local Plan 2016-2036



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Accessible housing and internal space standards background paper

June 2018



This background paper supports the Eastleigh Borough Local Plan and provides background information on the need for accessible housing and internal space standards. This document is not on deposit for consultation and is background evidence.

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1. Introduction

- 1.1. This paper is one of a number of background papers that have been prepared to inform the preparation of the emerging Eastleigh Borough Local Plan 2016-2036. It provides background information on the need for accessible and adaptable dwellings and minimum standards for internal dwelling space in the borough to help guide policy and future decisions. It has been prepared by Banister Solutions, in association with Eastleigh Borough Council.
- 1.2. In 2012 the Internal Space Standards background paper was published for the 2011-2029 Eastleigh Borough Council Local Plan. This recommended that the local plan internal space standards should be based on those published by English Partnerships (see appendix C) and successfully adopted by local authorities in West Sussex.



The 2012 Internal Space Standards background paper for the 2011-2029 Eastleigh Borough Council Local Plan

- 1.3. The Government's Housing Standards Review in March 2015 provided nationally described space standards which provide recommended minimum standards for internal space in new dwellings and revised part M of the building regulations which deals with accessibility and adaptability standards.
- 1.4. This paper sets out the need for standards to make new homes in the Local Plan period suitable in terms of both minimum internal space standards and suitable standards of accessibility and adaptability for the expected significant increase in older people and those with particular accessibility problems.
- 1.5. Draft policy requirements for both internal space and accessibility standards for new dwellings are provided and have been included in the emerging Local Plan as draft policies DM31 and DM32.

2. Executive Summary

- 2.1 There is a clear need for new homes to meet the accessibility requirements of an ageing population. Homes need to be adaptable for the changing needs of families and single people as their mobility decreases with age. Demographic evidence for Eastleigh shows that over the Local Plan period approximately 80% of new dwellings will have at least one occupant over 65 and that 7% of market sale housing and 8% of affordable housing will have at least one wheelchair user.
- 2.2 There has been much recent evidence at a national scale that a significant proportion of new homes have been built with internal space standards below what is deemed the minimum to allow an acceptable standard of family life. Recent evidence in Eastleigh has also borne this out with many sub-standard internal space standards provided in new housing developments across the borough before minimum standards were required and were imposed by the planning authority.
- 2.3 The Government has provided optional standards for accessible and adaptable housing, for wheelchair housing, and minimum internal space standards for new dwellings.
- 2.4 These standards will be used in draft policies for accessibility and internal space standards (see draft policies DM31 and DM32 of the emerging Local Plan, set out on pages 17 and 21 of this paper).

In Summary the draft policies are as follows:

- 2.5 On sites over 40 dwellings 8% of affordable housing will be required to be wheelchair accessible and 7% of market sale housing will be required to be wheelchair adaptable; 100% of new housing must be visitable and 80% must also meet the higher accessible and adaptable standards as set out by Part M4(2) of the building regulations.
- 2.6 All units in new specialist accommodation for older people will need to be wheelchair accessible or adaptable.
- 2.7 All new build dwellings will need to meet the Government's nationally described (internal) space standards.
- 2.8 The draft policies have been part of the overall viability testing that the Council has undertaken for the Local Plan.

3. The Need for Accessible and Adaptable Housing

- 3.1 The National Planning Policy Framework (NPPF) is clear that local planning authorities should plan to create safe, accessible environments and promote inclusion and community cohesion. This includes buildings and their surrounding spaces. Local planning authorities should take account of

evidence that demonstrates a clear need for housing for people with specific housing needs and plan to meet this need.

NPPF para 50.

To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:

- *plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities.....*

- 3.2 In Eastleigh the demographic projections¹ show that, over the plan period, 43% of the projected population increase is for people aged 75 and over and 79% of the projected 12,800 households are likely to have a household representative aged 65 or over. The Government position is that older persons should remain at home rather than enter use class C2 residential facilities where possible. This combination of factors shows the need for homes that are adapted and further adaptable for a less mobile population.
- 3.3 With approximately 80% of new homes likely to feature at least one occupant over 65 all these homes should be made accessible and adaptable for people with restricted mobility.

4. The Need for Wheelchair Useable Housing

- 4.1 The Council has regularly sought a percentage of wheelchair accessible dwellings as part of the affordable housing requirement in recent years.
- 4.2 Government research² shows that, based on English Partnerships figures from 2011-2012, nearly 30% of households have at least one person with a long term illness and over 3% have one or more wheelchair user.
- 4.3 While nationally 3.3% of households have a wheelchair user, for households living in affordable housing it is 7.1%. The rates are also higher for older households, and given that the number of older person households is likely to increase over the period to 2036, the proportion of households needing wheelchair housing in future is also likely to be higher.
- 4.4 The ORS housing model³ also shows that during the plan period 7% of total projected market households and 8% of total projected affordable households have a need for wheelchair adapted housing.

¹ Demographic Background Paper available at www.eastleigh.gov.uk/localplan2016-2036

² Guide to available disability data DCLG

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/416475/150323_Guide_to_disability_data_final_web_version.pdf

5. The Part M Building Regulations

- 5.1 The new Approved [Building Regulation] Document Part M⁴ has now been split into two separate volumes. Volume one (see link in references) relates to new dwellings only. Within this new document three categories of access and use now exist. The categories are as follows;

M4(1) (Category 1) – Visitable Dwellings

M4(2) (Category 2) – Accessible and adaptable dwellings

M4(3) (Category 3) – Wheelchair user dwellings (further split between a. wheelchair adaptable dwellings and b. wheelchair accessible dwellings)

- 5.2 Categories M4(2) and M4(3) are known as optional requirements and are the additional standards which can be imposed by planning through the local plan.

- 5.3 **M4(1) (Category 1) – Visitable dwellings** is the first tier for accessibility with basic requirements and which is a similar standard set out in the old Part M. This category states that;

M4(1), 'Reasonable provision must be made for people to:

- (a) Gain access to and
- (b) Use the dwelling and its facilities'

- 5.4 **M4(2) (Category 2) – Accessible and adaptable dwellings** is the second tier after the basic requirements highlighted in M4(1)
M4(2), 'The provision made must be sufficient to:

- a) Meet the needs of occupants with differing needs including some older or disabled people and
- b) To allow adaptation of the dwelling to meet the changing needs of occupants over time.

- 5.5 The addition of provisions under M4(2) to those under M4(1) is what elevates compliance to M4(2).

- 5.6 The main external and internal changes to a dwelling from M4(1) to M4(2) are set out in Appendix A.

- 5.7 Requirements in respect of **M4(3) – Wheelchair user dwellings** are set out in Section 3 of approved Document M. Where M4(3) dwellings are required these provisions replace M4(1) & (2).

³ ORS Assessment of Affordable Housing & Other Housing Types 2017 - www.eastleigh.gov.uk/localplan2016-2036

⁴ Approved Document M: Access to and use of buildings (Volume 1: Dwellings)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/540330/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf

- 5.8 M4(3) standards cannot be applied where M4(2) standards are already required.
- 5.9 Part M4(3) standards distinguish between fully wheelchair usable homes at the point of completion (M4(3)(2)b) and homes that are easily adaptable for the needs of a wheelchair user (M4(3)(2)a). For instance, where the standard is wheelchair accessible, a lift will be provided, whereas for an adaptable standard only the space would be provided for a lift, so that one could be provided at a later date.
- 5.10 Planning Practice Guidance Housing: optional technical standards <https://www.gov.uk/guidance/housing-optional-technical-standards#accessibility-and-wheelchair-housing-standards> para 8 states: '*that Local Plan policies for wheelchair accessible homes [M4(3)(2)b] should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling,*' Market sale dwellings could still be wheelchair adaptable (M4(3)(2)a).
- 5.11 The Building Regulations for accessible and adaptable or wheelchair user dwellings require that these types of dwelling should achieve step-free access. In setting policies requiring M4(2) and M4(3) compliant dwellings, local planning authorities will need to assess whether this has an impact on non-lift serviced multi-storey development in their local housing mix. Where step-free access in this type of development is not viable, neither of the Optional Requirements in Part M should be applied.

6. Accessibility Standards in other Local Authorities

- 6.1 A number of local authorities have begun to make policies based on the optional accessibility standards. These inevitably vary, ranging from more modest requirements to policies where 100% of new housing must at least meet M4(2) standards (e.g. Reading and London boroughs) and at least 10% of dwellings must meet the M4(3) standards (London boroughs).

London boroughs

- 6.2 The Mayor of London Housing Supplementary Planning Document https://www.london.gov.uk/sites/default/files/housing_spg_revised_040516.pdf which sets the standard for all London Boroughs has the following:

Standard 11 - '90 per cent of new build housing should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulation requirement M4(3) 'wheelchair user dwellings'.

City of Colchester

- 6.3 The Publication Draft stage of the Colchester Borough Local Plan 2017–2033 <https://beta.colchester.gov.uk/info/category/?id=emerging-local-plan> has 'identified a baseline standard of a minimum of 10% of market housing and 95% of affordable housing to meet Building Regulations 2015 Part M4 (2) accessible and adaptable standards and 5% affordable homes to be Part M4 (3)(2)(b) -wheelchair user standards.'

City of Reading

- 6.4 The pre-submission draft of the Reading Borough Local Plan November 2017 http://www.reading.gov.uk/media/8053/Pre-Submission-Local-Plan-November-2017/pdf/Pre-Submission_Local_Plan_November_2017.pdf

- 6.5 Policy H5 requires that:

New build housing should be built to the following standards:

e. All new build housing will be accessible and adaptable in line with M4(2) of the Building Regulations where it is viable, unless it is built in line with M4(3) (see below).

f. On developments of 20 or more new build dwellings, at least 5% of dwellings will be wheelchair user dwellings in line with M4(3) of the Building Regulations.

City of Bristol

- 6.6 Bristol City Council Local Plan Review - Consultation (February 2018) <https://www.bristol.gov.uk/documents/20182/34536/Bristol+Local+Plan+Review/09f23dba-9a9f-e387-8fc3-9637bca23125>

- 6.7 Proposal ULH 9: Accessible Homes states:

Para 4.5.3 The aim for all new development should be that new homes are accessible and adaptable. It is therefore proposed that current policy DM2 which expects all homes within older persons' schemes to achieve the 'accessible and adaptable dwellings' standard (applied through Building Regulations optional requirement M4(2)) should be widened to all homes.

Para 4.5.4 Current policies DM2 and DM4 expect 2% of new homes in larger schemes and 20% of new homes in older persons schemes to be wheelchair accessible, or easily adaptable for residents who are wheelchair users (applied through Building Regulations optional requirement M4(3)). It is proposed that these proportions are increased to enable more new homes to be available for wheelchair users. It is proposed that: 10% of new homes in larger schemes should be wheelchair accessible or, easily adaptable for residents who are wheelchair users. 50% of new homes in specialist older persons' housing schemes should be wheelchair accessible or, easily adaptable for residents who are wheelchair users.

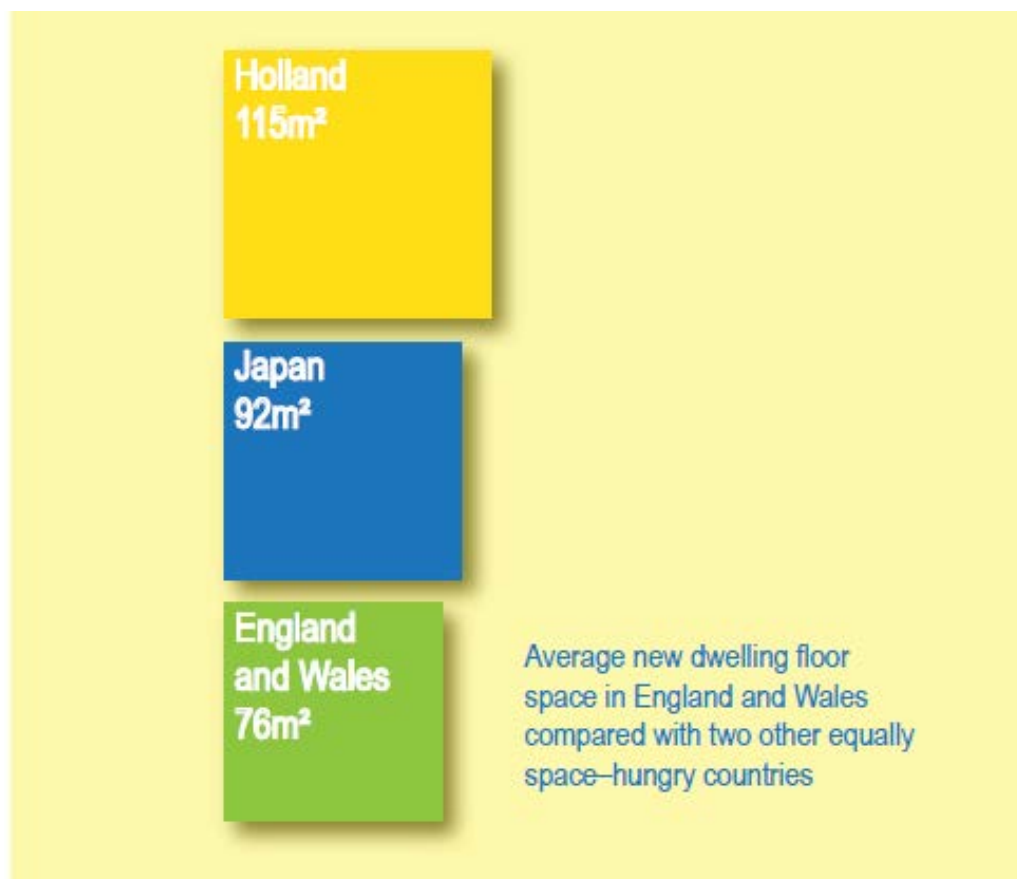
7. The Need for Minimum Internal Space Standards in Housing

7.1 Studies in the last decade have highlighted that many homes in the UK are being built significantly below even minimum space standards as set by the former English Partnerships, the HCA or the new London Plan. In Britain, new build homes are amongst the smallest in Europe.

- **RIBA 2007**

7.2 In April 2007, the Royal Institute of British Architects (RIBA) published a housing policy paper called '*Better Homes and Neighbourhoods*'. The paper states:

'The average home built today is significantly smaller than the equivalent built in 1920. While that is partly explained by smaller household sizes, England and Wales are the only countries in the EU which have no minimum space standards for housing.'



- **English Partnerships 2007**

7.3 In English Partnerships' '*Places, Homes, People Quality Standards: Delivering Quality Places*' (2007) the reasons for providing guidance on minimum acceptable internal floor areas are given as follows:

- To control the proposals for unsustainable micro-flats that the next generation will not want.

- To prevent smaller flats and houses which have limited scope for adaptability and flexibility and do not support the needs of growing families and wider choice.
- Because smaller properties offer less value for money per square metre than the equivalent building types built a decade ago and fail to attract the widest possible range of potential purchasers to the new developments.
- Social cohesion issues that are raised by small homes which do not support the needs of the people living in them (e.g. children who have no space at home to study or play hang around corridors and communal areas of flats and housing estates).
- Smaller homes have less room for environmental features and cannot meet other requirements like Lifetime Homes.

7.4 English Partnerships also assisted Gentoo Group Ltd (one of the largest social landlords in the UK) to provide a website www.swingacat.info which sets out space standards with the aim of promoting public awareness about the issue of small dwelling sizes in this country.

• C A B E 2009

7.5 In August 2009, the Commission for Architecture and the Built Environment (CABE), published the summary report '*Space in New Homes: What Residents Think*', based on the results of a survey of residents' views in London and South East England on the adequacy of space in their homes. It was commissioned jointly by CABE and English Partnerships and the full report is entitled 'Resident Satisfaction with Space in the Home' <http://webarchive.nationalarchives.gov.uk/20110118105129/http://www.cabe.org.uk/files/space-in-new-homes.pdf>

7.6 The results led CABE to advise local authorities to:-

- Introduce or apply existing minimum space standards through their planning departments.
- Recognise that adequate space in the home has an effect on health, diversity and community cohesion and that insufficient space provision in the local housing stock will impact on local services.

• R I B A 2011

7.7 In September 2011 the RIBA's '*Case for Space*' report (<https://www.architecture.com/-/media/gathercontent/space-standards-for-homes/additional-documents/ribacaseforspace2011pdf.pdf>) was published. It was based on 80 sites across England, and confirmed that nationwide, thousands of new homes are failing to provide the space families need. The average new three bedroom home currently being built by the UK's top house builders is around 8% smaller than the basic recommended minimum size, leaving thousands of people across the country short-changed. This squeeze on size is depriving thousands of families the space needed for children to do

homework, adults to work from home, guests to stay and for members of the household to relax together.

7.8 The Case for Space report found that:

- The floor area of the average new three bedroom home was only 92% of the recommended minimum size, therefore missing the space equivalent to a single bedroom which could comfortably accommodate a single bed, bedside table, wardrobe, desk and chair. With a floor area of 88m², the average house is 8m² short of the recommended size (the benchmark for comparison is the London Plan space standards for a 2 storey, 3 bedroom home big enough for 5 people).
- The most common new three bedroom home is smaller still at 74m². At only 77% of the recommended size it is missing 22m² and therefore the space equivalent to two double bedrooms and all their contents.
- The average single storey one bedroom home is 46m², which is 93% (4m² short) of the recommended minimum size – missing out on space equivalent to a single bed, a bedside table and a dressing table with a stool.

7.9 The Case for Space report also exposed the lack of transparency existing around the size of UK homes – details are simply not recorded or publicly available. Home buyers repeatedly fail to get detailed information about properties for sale or rent, and are rarely given the overall floor area. Consumers can therefore be left confused about the actual amount of space they are purchasing.

7.10 Harry Rich, RIBA Chief Executive said: *‘Our homes should be places that enhance our lives and well-being. However, as our new research confirms, thousands of cramped houses - shameful shoe box homes - are being churned out all over the country, depriving households of the space they need to live comfortably and cohesively. At a time when the Government, house building industry, economists and house buyers and renters are concerned about whether we are building enough new homes in the UK, it might seem odd to suggest that the focus should move to thinking about the quality of those homes. And yet this is the very time to do so. In a rush to build quickly and cheaply we risk storing up unnecessary problems for the future. There does not need to be any contradiction between building or refurbishing enough homes and making sure that they are of the highest quality.’*

- **RIBA 2017**

7.11 Following the publication of national space standards in 2015, the RIBA revisited the issue of space standards in the Space Standards for Homes report (<https://www.architecture.com/-/media/gathercontent/space-standards-for-homes/additional-documents/homewisereport2015pdf.pdf>). It was based the size of new homes on 100 sites across the UK.

7.12 The Space Standards for Homes found a small improvement in the size of new homes since 2011 but sizes are still below the recommended minimum. The report also highlighted large regional differences:

- The floor areas of the average new three bedroom home have increased from 88m² to 91m² (or 98% of the recommended minimum).
- Outside of London, the average new three bedroom home is 89 m², which is 4m² smaller than the new standard, equivalent to the size of a bathroom. The report identified large differences between areas.
- The relaxation of planning laws to allow the conversion of office buildings into housing within requiring planning permission has resulted in a number of very small apartments. Concerns are raised that expanding permitted development further will increase the number of very small properties that cannot be rejected on space grounds.

• **English Housing Survey 2013/14**

7.13 Nationally, affordable housing is generally occupied at capacity or over capacity (overcrowded and awaiting larger homes) to a greater level than private rented and owner occupied sectors. Based on 3 years data (2011-12, 2012-13 and 2013-14) the English Housing Survey identifies a greater level of “at capacity” or overcrowding in the affordable sector than the private sector.

7.14 The English Housing Survey 2013/14 provides the following data:

		all owner occupiers	all private renters	social renters
bedroom standard (2006 definition)³				
two or more below standard	over crowded	0.2	0.6	0.8
one below standard	over crowded	1.3	4.8	5.4
at standard	at capacity	13.3	43.9	55.5
one above standard	under occupied	35.5	35.9	28.3
two or more above standard	under occupied	49.7	14.8	10.0
all households		100.0	100.0	100.0
all households		63.4	19.2	17.4
	Under occupied	85.2	50.7	38.3
	At standard or over crowded	14.8	49.3	61.7

From Annex Table 2.7 EHS 2013-14

- 7.15 Levels of “at capacity” or overcrowding occupancy are highest in the affordable sector with 61.7% of all tenants occupying their property at ‘standard’ or ‘overcrowded’ as opposed to the Owner Occupied sector where this level of occupation runs at just 14.8% nationally.
- 7.16 Legislation introduced in 2012 by the *Welfare Reform Act*, relating to the reduced benefit entitlement for those under-occupying social housing, the “bedroom tax” will encourage further downsizing of households. This gives an incentive to fully occupy new and existing homes to avoid the loss of housing benefit (as applicable).
- 7.17 This adds further pressure on space within households and the need to provide a good standard of house size for affordable housing occupants.

Size v per person occupancy

- 7.18 Further evidence of greater occupation and hence the need for good sized homes on an ongoing basis is found in the “m² per person” statistics within the English Housing Survey.
- 7.19 Average floor area per household is highest for owner occupiers at 109m² while it is lower for private renters at 77m² then lowest in the social rented sector at 66m².
- 7.20 A similar, but less pronounced, pattern occurs for space per person with owner occupiers at 55m² per person, private renters at 39m² per person and social renters at 38m² per person.
- 7.21 This pattern is further emphasised with the usable floor area for different age groups.

Age of head of household

- 7.22 The highest per person space is 119m² for owner occupiers in the 45-54 age range, 82m² for private renters in the 55-64 age range and 72m² per person in the Social Rented sector for those aged 45-54.
- 7.23 This suggests fuller occupation in the social rented sector in generally smaller overall sized units. However note should be taken that in the 45-54 age group that families with children will leave home around this age giving under occupation levels prior to any downsizing that might occur.

Property Size per household type.

- 7.24 Different households by tenure have different unit sizes. The average house size for a couple with dependent children for instance is 126.8m² while for the same family type in the private rented sector it is 86.6 m² and in the social rented sector it is 77.6 m². For older households with one person over 60 the figures reduce to 90.0m² for owner occupiers, 67.5m² for private renters and 55.5m² for social renters.

- 7.25 The average floor space per person for a couple with dependent children is 32.4m² per person for those in the owner occupied market; 23.3m² per person in the private rented market and 18.7m² per person in the social rented sector. For older households with one person over 60 the figures are 82m² per person for owner occupiers; 67.4m² per person for private renters and 54.9m² per person for social renters.
- 7.26 For those who are retired, possibly in under-occupied homes as well as specifically designed retirement housing, the average space per person is 68.8m² in the owner occupied sector, 54.4m² in the private rented and 47.8m² in the social rented sector.
- 7.27 This is despite the affordable housing sector having had a series of minimum space standards and layouts over the years ranging from the Parker Morris standard in the post-war years to the standards within the Design and Quality standards of the HCA and more locally the South Gloucestershire 2008 SPD.
- 7.28 The conclusion of this evidence is that despite minimum standards being maintained for the affordable sector, the occupancy is higher per m² as homes are generally fully occupied at the point of allocation and remain so for longer. There is therefore a need to ensure that sufficient space is allowed for households when they are developed in the AH sector.

8. The Need for Space Standards in Eastleigh Borough

- 8.1 To assess the standard of internal space provision in the borough a desktop survey was carried out in 2012 for three recent developments (full details can be found in the 2012 Internal Space Standards background paper for the 2011-2029 Eastleigh Borough Council Local Plan) comparing actual space standards with the English Partnerships internal space standards, which in 2012 were the standard proposed for the 2011-2029 Local Plan.
- 8.2 The first case study (The South Street development on the southern edge of Eastleigh town) is a large development of over 400 units being built by Barratt Homes and Bovis Homes. 92% of the Barratts dwellings fall below the draft local plan policy minimum internal space standard, with only 5 flats meeting the standard. 62% of the Bovis dwellings fall below the draft local plan policy minimum internal space standard. All of the Bovis flats fall below the proposed minimum standard.
- 8.3 The second case study (a large flatted development on Twyford Road in Eastleigh town constructed by Barratt Homes) consists of 161 number 1 and 2 bedroom flats. 82% of the dwellings fall below the draft local plan policy minimum internal space standard.
- 8.4 In the third case study (on the site of the Fountains Inn, St John's Road, Hedge End and constructed by Tower Investments Ltd.) 14 residential units comprise 7 no. 2 bedroom flats and 7 no. 3 bedroom houses. 72% of the

dwellings fall below the draft local plan policy minimum internal space standard.

- 8.5 The assessment of the three schemes in the study indicated that there was a widespread under provision of internal space in new dwellings, such that flats and houses are consistently being built below the standards deemed acceptable for comfortable living and healthy social conditions. In the worst case 3 bedroom flats had an internal space nearly 30% below the proposed minimum standard.
- 8.6 A selection of sub-standard sized dwellings in two developments were further examined and the overall internal space broken down into the key measurements for storage, bedrooms and cooking and eating and living space. Cooking, eating and living space and bedroom space shortfalls varied enormously, with some dwellings meeting the proposed policy minimum for one of these two internal space sub categories. The quantity of storage space appeared to be consistently very low and significantly below the proposed policy minimum. This did not include a qualitative assessment of storage space, with low level storage below stairs and linen cupboards with boilers or pipes not necessarily providing good quality storage.
- 8.7 The conclusion from this study was that recent residential development, without the imposition of minimum space standards, was consistently providing inadequately-sized homes (when compared against recognised minimum standards), often with insufficient living space or bedroom space or both; and that there is a particular problem in providing sufficient storage space in the home.
- 8.8 Since 2012 English Partnerships standards and since 2015 new nationally described space standards have been successfully applied for new development in the borough. This has meant almost complete compliance with the minimum standards and shows that housebuilders are able to factor the standards in and their standard house types increasingly are aligned with the nationally described space standards.

9. The Nationally Described (Internal) Space Standards

- 9.1 Following the 2015 Housing Standards Review the Government published the *Technical housing standards – nationally described space standard*⁵. This standard deals with internal space within new dwellings and is suitable for application across all tenures.
- 9.2 It sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key

⁵ Technical housing standards – nationally described space standard DCLG
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf

parts of the home, notably bedrooms, storage and floor to ceiling height. See Appendix B for the details of the technical standards.

- 9.3 Local Planning Authorities are able to make these standards a requirement for new dwellings if they are adopted policy in the Local Plan and are subject to the usual viability tests.

10. Viability

- 10.1 A viability assessment has been undertaken by Dixon Searle Partnership for the Council for the whole Local Plan and its draft policies including the draft policies for accessibility and adaptability, wheelchair useable dwellings (DM31) and for minimum internal space standards (DM32).
- 10.2 Dwelling sizes assumed compliant with the national space standards have been included in the modelling for this viability assessment - as a standard assumption throughout and the conclusions of the viability assessment were that the application of the minimum space standards across all sizes of dwellings has no significant impact on viability of developments.
- 10.3 In the findings review for residential development, the report concludes in relation to space standards as set out in draft policy DM 32: *We consider that the implications of meeting this are more around early planning and design considerations; and not related to financial viability to a detectable degree. For the assessment purpose, some slightly increased floor areas mean higher build costs but these are also reflected in pro-rated sales values increases because essentially we look at the strength of the relationship between development values and costs viewed through a £/sq. m basis.*
- 10.4 As part of the Government's Housing Standards Review consultation, cost analysis was produced by EC Harris (and subsequently updated) relating to areas that included Access. Within the 2014 update to that review document, approximate costs of complying with the optional Category 2 requirements of Part M4 were included. This indicates various costs for different types of dwelling and on different forms of development. For the purposes of this report, the average extra over access cost per dwelling is approximately total of £2,447 for houses and £1,646 for flats for meeting Part M4 (2) standards. This is based on an average extra over access cost per dwelling (£682/dwelling) alongside the average access related space cost per dwelling but without allowing for cost recovery (£1,444/ dwelling).
- 10.5 For Part M4 (3) the same report indicates average extra over costs to be £15,691 for flats and £26,816 for houses. The report does not make clear, but it is assumed that this cost is for the full accessibility standard M4(3)(2)b which would be significantly more costly than the lesser adaptable standard M4(3)(2)a.
- 10.6 The Local Plan viability assessment concludes in relation to accessibility standards set out in draft policy DM 31 i and ii proposed (20% of new

dwellings meeting M4(1) standard and 80% of dwellings to meet at least M4(2) standard) that:

Overall it is considered that the thrust of DM31 should prove viable in most overall Plan relevant scenarios. From a pure viability point of view, we consider it unlikely that the policy requirements as drafted (except as noted below [relating to draft policy DM31 iii]) would be responsible for rendering an otherwise viable scheme unviable.

- 10.7 The viability report had some concerns with the draft policy DM 31 iii which required the following:

And for major development of 40 residential units and above, ii should include:

iii. At least 2 dwellings or 7% (if higher number) of all market housing; at least 1 dwelling or 8% (if higher number) of all affordable housing; and 100% of all specialist housing for older people meet the Part M building regulations M4(3) standard (Wheelchair user dwellings).

- 10.8 To help address the first part of the concern which was that the requirement for 7 % of market housing and 8 % of affordable housing to meet M4(3) standards (Wheelchair user dwellings), it might be prudent to distinguish between the two tenures and the two sub standards in Part M4(3). It is proposed that the affordable housing units continue to meet the M4(3)(2)b standard (wheelchair accessible dwellings) while the market housing would only be required to meet the M4(3)(2)a standard (wheelchair adaptable).

- 10.9 The cost differential should be significant as, for example, only the space for a potential lift needs to be designed in for a wheelchair adaptable dwelling and the lift itself only needs to be implemented for wheelchair accessible dwellings. Wheelchair accessible homes also need more specialist kitchen toilet and bathroom specifications which will also have an added cost over merely adaptable dwellings.

- 10.10 The viability report also raised concerns about the cost of requiring 100% of specialist accommodation for older people needing to meet M4(3) standards. The provision of a mix of housing in order to meet the needs of people across the borough, including older people, is a corporate priority. At the Cabinet meeting on 15 February 2018, the Council agreed an emerging approach to housing tenures and adopted the Corporate Strategy for Housing. This included a commitment to focusing on older persons housing needs, supported by additional research on meeting the needs of particular groups.

- 10.11 The Council has worked in partnership with Hampshire County Council to find suitable sites for extra care housing and will continue to collaborate with the County Council and other partners to deliver housing for older people. The requirement for all specialist accommodation for older people to meet the M4(3) standard will be considered in the context of ongoing Council support and based on additional research on specific housing needs for older people within the borough.

11. Conclusions

• Accessibility

- 11.1 Demographic change means that there is an opportunity for new housing delivered during the Local Plan period to meet the accessibility needs of a rapidly ageing population.
- 11.2 A figure of 80% for homes meeting the optional M4(2) standard for building regulations (accessible and adaptable dwellings) would match the nearly 80% of new homes likely to feature at least one occupant over 65 in Eastleigh borough and has been assessed by the Eastleigh Local Plan Viability Study as having no significant effect on development viability.
- 11.3 A figure of 7% for market housing and 8% for affordable housing meeting the optional M4(3) standard for building regulations (wheelchair adaptable and wheelchair accessible dwellings standards applied respectively) would accord with the projected numbers of new dwellings in Eastleigh borough with at least one wheelchair user during the Local Plan period.
- 11.4 As the M4(3) standard is a higher standard than the M4(2) standard to avoid double counting it would be reasonable to expect the 7% or 8% M4(3) requirement to be a part of the 80% of new homes requiring at least the M4(2) standard.
- 11.5 As the Planning Policy Guidance advises that wheelchair accessible standards (M4(3)(2)b) should not apply to market sale housing, the lesser wheelchair adaptable (M4(3)(2)a) standards should be applied to these homes instead. This may be a sufficient response to the viability concern about the cost for this policy requirement (which until this point has assumed full accessible standard for all tenures).
- 11.6 The viability report also raised concerns about the potential effect of a wheelchair accessible standard being applied to 100% of accommodation for older people. The Council supports the provision of well-designed older persons' housing and is undertaking further research on the appropriate housing mix within the borough. It will continue to examine how the application of this requirement affects this delivery.

• Space Standards

- 11.7 The need for internal space standards in new housing is overwhelming given the evidence both nationally and locally that without them many new homes are likely to be built below the recognised minimum standards sufficient for a healthy living environment for individuals and families.
- 11.8 Sub-standard homes are likely to have significant societal costs which will more than outweigh the modest extra capital cost of providing at least minimum space standards in every new dwelling.

- 11.9 The nationally described space standards have been applied successfully for several years in Eastleigh borough and are already established nationally with housebuilders.
- 11.10 The viability study has concluded that a policy applying the nationally described space standards to all new dwellings has been assessed by the Eastleigh Local Plan Viability Study as having no significant effect on development viability.
- 11.11 All new homes should therefore be required to be in accordance with the nationally described space standards.

12. Draft Accessible Housing Policy

Policy DM31, Dwellings with higher access standards

The Borough Council requires that development should meet higher national access standards as set out in Part M of the building regulations for new build residential development (or future equivalent);

- i. 100% of new dwellings should meet at least Part M4(1) standard (Visitable dwellings) including;
- ii. 80% of new dwellings on each site should meet at least Part M of the building regulations M4(2) (Accessible and adaptable dwellings) standards;

and for major development of 40 residential units and above, ii should include:

- iii. At least 2 dwellings or 7% (if higher number) of all market housing; at least 1 dwelling or 8% (if higher number) of all affordable housing; and 100% of all specialist housing for older people meet the Part M4(3) (Wheelchair user dwellings).

- 12.1 Further details of the three accessible housing standards can be found in Part M of the Building Regulations (2015 edition with 2016 amendments) <https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m>
- 12.2 NB Level access may not be possible in all circumstances, i.e. particularly where a site or plot may be on a slope, be subject to flooding or not require lift access. Approved Document M refers to a steeply sloping plot as one where the gradient exceeds 1:15. M4 (1) Visitable standard accepts that it may not be possible to achieve a step-free access in such an instance (and permits a stepped approach). Therefore it is proposed that where the finished site and or plot levels and approach from relevant parking exceed 1:15 gradient, the plot is subject to flooding or lift access is required (in the case of flatted development up to 4 storey) M4(2) & M4(3) accessibility standards will not be required.
- 12.3 As M4(1), M4(2) and M4(3) are increasingly higher standards, how these standards would apply in the following illustrative developments of 1, 10, 11, 40 and 100 homes is shown in the table below. This assumes that affordable housing is applied for developments of 11 homes and above; that the three Part M categories are spread evenly across both the market and affordable housing units; and that numbers of dwellings are rounded up or down, but with the minimum numbers of M4(3) numbers dictating the final distribution across the categories.

Examples of accessible standards for different sized developments

Size of development (no. of units, split between affordable / market housing)	Number of accessible units required:			
	M4(1) Visitable	M4(2) Accessible & Adaptable	M4(3)(2)a Wheelchair adaptable	M4(3)(2)b Wheelchair accessible
Single dwelling				
1 market	20% or 0 0	80% of 1 1 dwelling	N/A	N/A
0 affordable	N/A	N/A	N/A	N/A
Development of 10 dwellings				
10 market	20% of 10 = 2 dwellings	80% of 10 = 8 dwellings	N/A	N/A
0 affordable	N/A	N/A	N/A	N/A
Size of development (no. of units, split between affordable / market housing)	Number of accessible units required:			
	M4(1) Visitable	M4(2) Accessible & Adaptable	M4(3)(2)a Wheelchair adaptable	M4(3)(2)b Wheelchair accessible
Development of 11 dwellings				
7 market	20% of 7 = 1.4 1 dwelling	80% of 7 = 5.60 6 dwellings	N/A	N/A
4 affordable	20% of 4 = 0.8 1 dwelling	80% of 4 = 3.20 3 dwellings	N/A	N/A
Development of 40 dwellings				
26 market	20% of 26 = 5.2 5 dwellings	73% of 26 = 18.98 19 dwellings	7% of 26 = 1.82 2 dwellings	N/A
14 affordable	20% x 14 = 2.8 3 dwellings	72% x 14 = 10.08 10 dwellings	N/A	8% of 14 = 1.12 1 dwellings
Development of 100 dwellings				
65 market	20% of 65 = 13 13 dwellings	73% of 65 = 47.45 47 dwellings	7% of 65 = 4.55 5 dwellings	N/A
35 affordable	20% x 35 = 7 7 dwellings	72% x 35 = 25.2 25 dwellings	N/A	8% of 35 = 2.8 3 dwellings

13. Draft Internal Space Standards Policy

13.1 Policy DM32, Internal space standards for new residential development

The Borough Council requires that all new dwellings meet as a minimum the Nationally Described (internal) Space Standards (or future equivalent).

Development proposals should be accompanied by a table setting out for every dwelling:

- i. the gross internal floorspace
- ii. extent of built-in storage (sqm)
- iii. minimum floor to ceiling height for at least 75% of the Gross Internal Area.

- **Technical requirements**

13.2 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

NB: The internal face of a perimeter wall is the finished surface of the wall. For a detached house, the perimeter walls are the external walls that enclose the dwelling, and for other houses or apartments they are the external walls and party walls

13.3 Minimum floor areas:

Table 1 - Minimum gross internal floor areas and storage (m²)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

13.4 Further detail on how to apply this standard can be found by referring to the technical housing standards – nationally described space standard (2015). https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf

13.5 The Gross Internal Areas in the above table will not be adequate for wheelchair housing (see accessible housing policy) where additional internal area is required to accommodate increased circulation and functionality to meet the needs of wheelchair households.

References

1. Eastleigh Borough Assessment of Affordable Housing & Other Housing Types 2017, Report of Findings: July 2017, Opinion Research Services
<https://www.eastleigh.gov.uk/media/2533/draft-affordable-housing-assessment-july-2017.pdf>
2. Guide to available disability data DCLG 2015
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/416475/150323_Guide_to_disability_data_final_web_version.pdf
3. Part M of the Building Regulations (2015 edition with 2016 amendments)
<https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m>
4. Technical Housing Standards - Nationally Described Space Standards
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf

Appendix A: M4(2) (Category 2) – Accessible and adaptable dwellings

The main external changes to a dwelling from M4(1) to M4(2) include;

- All external doors must have a level threshold
- Approach routes must have a minimum clear width of 900mm or 750mm at localised obstructions and have a gradient between 1:20 and 1:12
- Every gate way must have an 850mm clear opening, with a 300mm nib on the leading edge to allow manoeuvring to reach the handle.
- Parking spaces within the private curtilage of the dwelling (but not a car port or garage) must include at least one standard parking bay that can be widened at a later date to 3.3m.
- Every principal entrance must have a canopy/ porch area covering a minimum width of 900mm and depth of 1200mm.
- External doors must have an openable width of 850mm and have a 300mm nib on the leading edge (see diagram 2.2 ADM)

The main internal features include;

- Stairs must be a minimum width of 850mm to allow the future installation of a stair lift
- At least one bedroom must have a 750mm clear access zone from the foot of the bed and on both sides. Every other double bedroom will need a clear access zone on one side and the foot of the bed. Plans of furniture layouts in this instance will need to be provided to show compliance (See diagram 2.4 ADM).
- Walls, ducts and boxings on all WC, bathroom and wet rooms must be strong enough to support grab rails, shower seats and other adaptations which can take a load of 1.5kn/m².
- A bathroom must be located on every floor which has a bedroom
- Ground floor WC must have a hidden drainage connection and be large enough to accommodate a shower (see diagram 2.6)
- Consumer units must be mounted at a height between 1350mm and 1450mm above floor level.
- Handles for windows unless on remote opening system must be located between 450mm and 1400mm above floor level.

Appendix B: The Nationally Described (Internal) Space Standards

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf

- **Technical requirements**

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

NB: The internal face of a perimeter wall is the finished surface of the wall. For a detached house, the perimeter walls are the external walls that enclose the dwelling, and for other houses or apartments they are the external walls and party walls

Table 1 - Minimum gross internal floor areas and storage (m²)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

Further detail on how to apply this standard can be found by referring to the technical housing standards – nationally described space standard (2015). The Gross Internal Areas in the above table will not be adequate for wheelchair housing (see COM03 Accessibility Standards) where additional internal area is required to accommodate increased circulation and functionality to meet the needs of wheelchair households.

Appendix C: The English Partnerships (Internal) Space Standards

Size of property	Internal floor space (sqm)
1 bedroom/2 person homes	51
2 bedroom/3 person homes	66
2 bedroom/4 person homes	77
3 bedroom/5 person homes	93
4 bedroom/6 person homes	106

English Partnerships minimum space standards for new development (2008)

www.eastleigh.gov.uk/localplan2016-2036

