

LCCAD1

A Local Plan for Lancaster District

2011-2031

Background Paper – Housing Standards

June 2018



LANCASTER
CITY COUNCIL

Promoting City, Coast & Countryside

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1.0 Introduction

1.0 This paper has been prepared to support emerging policy DM2 (Housing Standards) of the draft Development Management DPD. The policy sets out requirements for optional housing standards relating to floor space and accessible and adaptable homes, and considers the merit of introducing an optional water efficiency standard and a wheelchair housing standard.

2.0 Background

National Policy

- 2.1 On 25th March 2015 the Government published a [Written Ministerial Statement](#) on new “technical housing standards” in England. This meant that from October 2015 local planning authorities had the option of setting technical requirements, exceeding the minimum Building Regulations relevant to access, water efficiency, and a Nationally Described Space Standard. However, local planning authorities no longer had the opportunity to set locally defined standards concerning construction, internal layout and general energy performance.
- 2.2 The WMS followed on from the conclusions of the [Housing Standards Review](#) undertaken in order to rationalise the number of different standards that local authorities were able to apply to new homes through the planning system which had provided for a complex system for developers often varying between individual authorities.
- 2.3 All optional standards must be applied through policies in local plans and the use of conditions attached to planning approvals.
- 2.4 The housing standards relate to three key areas:
- Water efficiency
 - Internal space; and
 - Accessibility and Adaptability
- 2.5 To understand the need for optional standards local authorities must be able to satisfy the statutory requirements of the [National Planning Policy Framework](#) (2012), hereafter known as the Framework. The Framework requires local plans to be based on ‘adequate up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area,’ (para 158).
- 2.6 The Framework also sets out the requirements for local planning authorities to ‘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... evidence supporting the assessment should be proportionate, using only appropriate available evidence’ (para 174).
- 2.7 Planning Practice Guidance on Housing: optional technical standards was published in March 2015 this states ‘Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional Nationally Described Space Standard. Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans.’

3.2 In respect of viability the Planning Practice Guidance states ‘Local Planning Authorities should consider the impact of using these standards through their Local Plan Viability Assessment.’ Therefore it is important that alongside other policy requirements introducing the optional standards should not jeopardise the delivery of new residential development by making it unviable.

3.0 Local Policy

- 3.1 The existing adopted Development Management DPD which was adopted in December 2014. Policy DM41 (New Residential Development) states that ‘the council will generally support proposals for new homes in all locations that incorporate the Lifetime Homes Standard and other design standards such as Building for Life 12 (or successor versions).’
- 3.2 Policy DM36 (Sustainable Design) provides for encouragement of standards such as Code for Sustainable Homes (now abolished), [BREEAM](#) and [Passivhaus](#) but does not set specific requirements.
- 3.3 The council has undertaken significant work to prepare a new Local Plan for the District. The council has prepared the emerging policy through consideration of the outcomes of the final [Strategic Housing Market Assessment \(Part II\)](#) to assess need, and the outcomes of the [Whole Plan Viability Assessment](#) to assess viability. Policy DM2 (Housing Standards) of the submission version Development Management DPD sets proposed requirements.

4.0 Water Efficiency

4.1 Water efficiency is beneficial for a number of reasons:

- It saves money – cutting water use automatically reduces water charges where household meters are in place;
- It reduces waste through less water going down drains, reduces the risk of flooding, and reduces the cost of water treatment;
- It reduces a household’s carbon footprint and contributes to carbon reduction targets;
- It preserves natural resources and helps to tackle climate changes;
- Half of all water used is hot water and therefore greater efficiency reduces energy bills.

The optional standards for water efficiency

4.2 [Part G of the Building Regulations](#) provides requirements for water efficiency in residential properties. The baseline requirement is for 125 litres per person per day. The optional housing technical standard is for 110 litres per person per day, set out in the Building Regulations, which includes 5 litres per person per day for external use. The higher standards can be met either through a fittings-based approach, imposing maximum consumption rates for various fittings such as WCs, basin taps, and showers, or calculating the whole house water consumption using a ‘water efficiency calculator’ for new dwellings.

The current local position

- 4.3 Currently the council does not set any local requirements other than through mandatory Building Regulations. However, the emerging Development Management DPD sets out policies on water management to ensure water resource needs within the District are managed effectively, these are set out in policies DM30, DM35 and DM36.

What evidence should be considered when assessing whether to implement the technical standard on water efficiency?

- 4.4 The Planning Practice Guidance identifies that sources of evidence which might indicate a need for a water efficiency standard include:

The [Environment Agency Water Stressed Areas Classification](#) (2013) identifies areas of serious water stress where household demand for water is (or is likely to be) a high proportion of the current effective rainfall available to meet that demand;
Water resource management plans produced by water companies;
River Basin Management Plans – these describe the river basin district ([North West](#) as is the case for the Lancaster District) and the pressure that the water environment faces; these include information on where water resources contribute to a water body being classified ‘at risk’ or ‘probably at risk’ of failing to achieve good ecological status, due to low flows or reduced water availability.

Locally specific evidence may also include water cycle studies carried out in areas of high growth.

- 4.5 The Environment Agency report Water stressed areas – final classification July 2013 provides formal advice to the Secretary of State on which areas in England are areas of serious water stress. The level of water stress is grouped into low, moderate and serious categories. Even in areas not identified as being under stress, the document states that some activity should be in place to ensure water is used more efficiently and effectively.
- 4.6 Lancaster is situated within the [United Utilities](#) water area. The document identifies that this water area is not under serious stress. The map on page 8 of the document shows that the district itself is under low stress.
- 4.7 Water companies have a statutory duty to produce a [Water Resources Management Plan](#) (WRMP). The latest Water Resources Management Plan for United Utilities was published in 2015 and identifies how water demand will be managed between 2015 and 2040. The document is updated every 5 years. DEFRA has set out the Government’s expectation that water companies will deliver overall demand reductions via demand management measures, including water efficiency. DEFRA have further stated that management companies must show in their WRMP how water per capita consumption will be reduced. Water companies must present their proposals for setting out how they will achieve demand reductions in their WRMP based on real, measurable and quantified water savings. Defra has confirmed that the 2015 revised draft plan could be published as the Final 2015 Water Resources Management Plan. The WRMP identifies a number of measures for managing the balance between demand and supply whilst achieving the Government’s targets.
- 4.8 Consultation has taken place with United Utilities which is the water authority for the district. In March 2017 United Utilities responded to the consultation on the draft Local Plan stating that they support the encouragement for water efficiency measures in draft policy DM26.
- 4.9 The River Basin Management Plan for the North West published by DEFRA and the Environment Agency in 2009 and then updated in 2015. The document focuses on the protection,

improvement and sustainable use of the water environment. There is no information here pointing towards an identified need for the optional water efficiency standard to be introduced.

Does the evidence identify a need for the optional water efficiency standard?

- 4.10 A review of evidence identifies that promoting water efficiency provides important benefits to society. Indeed water efficiency is an important priority for United Utilities which has set out initiatives to promote the efficiency of water use. Nevertheless, overall the evidence identifies that the Lancaster district is not an area of serious water stress and therefore on balance it is not recommended that the optional water efficiency standard is adopted as planning policy in Lancaster.

5.0 Accessible and adaptable homes and wheelchair accessible homes M4(2) and M4(3)

- 5.1 We live in a society where there is a significant level of people with an identified need for accessible housing. Nationwide research by the [London School of Economics](#) estimates that there are at least 1.8 million households in England where there is a need for accessible housing, of which 580,000 contain someone of working age¹. This is also not just restricted to those with an affordable need, for example 1 in 4 households needing accessible housing (480,000) have incomes above the median income of all owner occupier households, suggesting a significant capacity to become owners.
- 5.2 The benefits of accessible housing are numerous, research from interviews with people with an identified need, reported that accessible housing can provide a greater feeling of control, feeling safer, having a better social life². Some of these benefits are direct, for example being able to take a shower, or getting upstairs using a stairlift, whilst those listed above may be less direct they are equally as important given the close relationship between health and wellbeing. There are also significant disadvantages of not meeting identified accessibility needs, such as loneliness and exclusion from being unable to have a social life, a feeling of being trapped in your own home and relying more on carers, family or friends where adaptations may help people live more independently³.
- 5.3 Benefits can be wider than for just those people who have an accessibility need ensuring they are able to meet their own needs, for example research by [Habinteg](#) identifies that, accessible homes generally can mean that those with an accessibility need may be able to visit friends and family who live in an accessible home⁴. A change in lifetime circumstances can also mean that where someone who lives in accessible and adaptable home, in the future requires an adaptation to be made, these can be undertaken within their existing home and therefore avoiding the upheaval or cost of moving home. In a district like Lancaster where the population is projected to age significantly over the next twenty years such requirements are ever more pertinent.

¹ No Place Like an Accessible Home: Quality of life and opportunity for disabled people with accessible housing needs, London School of Economics, Centre for Analysis of Social Exclusion, Bert Provan, Tania Burchardt, Ellie Suh, Case report 109, July 2016

² ibid

³ ibid

⁴ Habinteg Accessible Homes LocAL Authority Toolkit

5.4 Accessible housing also provides significant cost benefit savings to the NHS and health and social care. For example accessible housing enables people to live in their homes for longer without transferring to residential care. It can reduce bed blocking as people are able to return to accessible home after a stay in hospital and therefore reduce NHS waiting times. A report by the [Building Research Establishment](#) in 2015⁵ identified that inadequate housing had an impact cost on the NHS of approximately £1.4 billion, of which around 30% of this cost is attributed to falls in the home.

The optional standards for accessibility

5.5 The [Building Regulations Part M Access to and use of dwellings Volume 1: Dwellings](#) is split into three parts:

- M4(1) Category 1: Visitable dwellings
- M4(2) Category 2: Accessible and adaptable dwellings
- M4(3) Category 3: Wheelchair user dwellings.

5.6 Requirement M4(1) is mandatory for all new dwellings unless one of the optional requirements M4(2) or M4(3) applies. Therefore it is optional whether a Local Authority proposes to adopt the requirements of M4(2) and M4(3). The optional standard M4(2) is similar in ethos to the [Lifetime Homes](#) standard. It should be noted that M4(2) only applies to new build dwellings and cannot be applied to conversions.

- Allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs; or
- Meet the needs of occupants who use wheelchairs.

5.7 M4(3) concerns wheelchair user dwellings. A distinction is made between wheelchair accessible and adaptable homes. Provision must be made sufficient to:

5.8 Planning Practice Guidance states Local Plan policies should only be implemented for wheelchair accessible homes (i.e. those that are ready for use by people in a wheelchair) where the local authority is responsible for allocating or nominating a person to live in that dwelling namely social housing. Therefore whilst M4(2) and M4(3)(2)(a) may be a requirement of market housing M4(3)(2)(b) can only be a requirement of affordable/social housing.

5.9 The Building Regulations set out performance objectives to identify where a new dwelling has reasonable provision to meet the requirements of the optional accessibility standards.

For M4(2) these comprise:

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

⁵ Building Research Establishment, Homes and ageing in England Helen Garrett and Selina Burris, 2015

e) Wall-mounted switches, socket outlets and other controls are reasonably accessible to people who have reduced reach.

N.B Our emphasis

For M4(3) these comprise:

- a) Within the curtilage of the dwelling or the building containing the dwelling, a wheelchair user can approach and gain step-free access to every private entrance to the dwelling and to every associated private outdoor space, parking space and communal facility for occupants' use;
- b) Access to the WC and other accommodation within the entrance storey is step-free and the dwelling is designed to have and the potential to achieve step-free access to all other parts;
- c) There is sufficient internal space to make accommodation within the dwelling suitable for a wheelchair user;
- d) The dwelling is wheelchair adaptable such that key parts of the accommodation, including its sanitary facilities and kitchens, could be easily altered to meet the needs of a wheelchair user or, where required by a local planning authority, the dwelling is wheelchair accessible;
- e) Wall-mounted switches, controls and socket outlets are accessible to people who have reduced reach.

N.B Our emphasis

- 5.10 Local Plans should clearly state what proportion of new dwellings should comply with the requirements. Policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the optional requirements in Part M should be applied.
- 5.11 This means that if M4(2) and M4(3) are applied to a development all dwellings above the ground floor will require step-free access. Local planning authorities will need to assess whether this has an impact on non-lift serviced multi-storey development; where step-free access in this type of development is not viable, neither of the optional requirements in Part M should be applied.

The currently position locally on accessibility standards

- 5.12 The council under policy DM41 currently provides general support for new homes in all locations that incorporate Lifetime Homes Standard and other design standards such as [Building for Life 12](#) (or successor versions). Therefore whilst support has existed for adaptable dwellings within the authority, the 2014 Development Management DPD did not place a specific requirement for accessible and adaptable homes in mainstream housing.
- 5.13 Policy DM45 Accommodation for vulnerable communities states that proposals for accommodation for older people will be supported subject to the proposal being wheelchair accessible. It should be noted that this policy was formulated prior to the optional housing technical standards being published by Government but places a high requirement on specialist housing for older people.

What evidence should be considered when assessing whether to implement this technical standard?

- 5.14 The Planning Practice Guidance states that information from housing needs assessments (undertaken as part of Strategic Housing Market Assessments) and other available datasets should be taken into account, including:
- The likely future need for housing for older and disabled people (including wheelchair user dwellings);
 - Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes);
 - The accessibility and adaptability of existing housing stock;
 - How needs vary across different housing tenures.

What evidence has been used to assess whether to implement this optional standard in Lancaster?

Ageing population

- 5.15 The latest [household projections](#) published on 12th July 2016⁶ set out the picture for Lancaster in the table below.

Table 1 Projected population change 2017 to 2033				
Age group	2017	2033	Change 2017-2033	% Change 2017-2033
0-14	22,700	23,500	800	3.5%
15-29	34,200	35,300	1,100	3.2%
30-44	23,000	24,500	1,500	6.5%
45-64	35,500	32,300	-3,200	-9.0%
65-79	20,700	24,600	3,900	18.8%
80+	7,800	12,400	4,600	59.0%
Total	143,900	152,600	8,700	6.0%
Aged 65+	28,500	37,000	8,500	29.8%
Aged 80+	7,800	12,400	4,600	59%
Aged 65+ (% as a proportion of total population)	19.8%	24.2%		

Source: Office for National Statistics 2014 Sub-National Population Projections

- 5.16 The above table identifies a significant increase in older age groups within the district with a very pronounced increase in people aged 80 and over. As people age, needs for accessible and adaptable homes to accommodate equipment such as stairlifts increase.
- 5.17 Further information relevant to household components is taken from the 2014 Sub National Household Projections, which identify that in 2014 over 18,000 homes in the district contained someone aged over 65 and this is projected to grow to over 26,000 households in 2039, proportionately these figures represent 31% of households and 38% respectively.

⁶ 2014 Sub National Population Projections, Office for National Statistics, July 2016

5.18 In terms of tenure profile, the 2011 Census identified that a significant proportion of households where the household representative (generally the oldest person in the household) is 65 or over are owner occupied, the figure for Lancaster being 80%, which is higher than Lancashire overall. The different tenure proportions are set out in the table below.

Table 2: Older persons housing tenure						
All households 65 or over	Owned	Rented from the council	Other social rented	Private rented	Living rent free	Shared ownership
16,697	13,356	1,217	711	1,025	316	72
As % total of households	80	7	4	6	2	0
Lancashire	132,262	8,348	15,575	9,465	3,336	862
169,848	78	5	9	6	2	1

Source Office for National Statistics: Census 2011

5.19 In 2017 consultants arc4 undertook a household survey as part of the Strategic Housing Market Assessment (Part II) this identified the main intentions for older people's housing options over the next 5 years. The survey identified that the majority of people wished to remain in their own homes or alternatively buy a property on the open market.

Table 3: Older persons housing options	
Continue to live in current home with support when needed	67.4
Buying a property on the open market	20.8
Rent a property from a private landlord	7.1
Rent from HA	13.3
Sheltered accommodation to rent	17.3
Sheltered accommodation to buy	13.9
Sheltered accommodation to part buy/part rent	5.0
Extra care housing to rent	13.8
Extra care housing to buy	9.0
Extra care housing part buy/part rent	3.5
Co-housing	10.7
Go to live with children or other relatives/friends	4.0
Other	3.5
Base (total households responding)	24,668

N.B figures do not add up to 100% as respondents were able to pick up more than one choice
Source: arc4 Strategic Housing Market Assessment (Part II) 2018

5.20 The household survey also asked respondents all of ages whether adaptations were needed in the home and what sort of adaptations would be required. These are set out in the table below and identify that there is a significant increase in prevalence of need for adaptations aligned to an increase in age.

Table 4: Adaptations required either now or in the next 5 years by age group			
Adaptations required	Age group (% of households)		Total
	Under 65 years	65+ years	

Table 4: Adaptations required either now or in the next 5 years by age group			
Better heating	11.5	7.5	10.4
More insulation	11.3	4.7	9.4
Double glazing	10.9	5.5	9.4
Adaptations to kitchen	5.5	4.9	5.3
Adaptations to bathroom	7.9	14.4	9.8
Internal handrails	5.7	11.5	7.4
External handrails	4.3	8.9	5.6
Downstairs WC	4.1	5.3	4.4
Stair lift	3.6	7.8	4.8
To access	3.0	4.3	3.4
Wheelchair	2.8	3.9	3.1
Level door	1.8	2.0	1.9
Carer	2.5	2.1	2.4
Community alarm	2.8	7.9	4.3
Security alarm	6.1	5.5	5.9
Property size	6.4	1.6	5.1
Sound proofing	6.6	2.1	5.3
Ventilation	5.3	1.9	4.3
Base	43,302	17,433	60,735

Source: arc4 Strategic Housing Market Assessment (Part II) 2018

- 5.21 The 2011 census also identified prevalence of disability within the district, this shows that within the district there are a higher proportion of people who's day-to-day activities are limited in comparison to the national average.

Table 5: 2011 Census	
Illness/disability	% of households containing someone with an illness/disability by sub-area
Physical / mobility impairment	9.8
Learning disability / difficulty	1.7
Mental health problem	7.2
Visual impairment	3.5
Hearing impairment	6.9
Long standing illness or health condition	14.2
Older Age-related illness or disability	2.0
Other	7.8
% of all households containing someone with an illness/disability	43.9

- 5.22 Therefore in summary the above findings identify that Lancaster has a significantly ageing population, of which the majority live in owner occupied housing. There is also a clear desire for older people to continue living in their own home or to move within the open market. Findings also identify adaptations of up to 15% in those aged 65 and over. However, need for accessible homes is also found within people of working age who may be less mobile or disabled. As such a need exists for accessible and adaptable homes within the district.

[Wheelchair housing](#)

- 5.23 The Habinteg toolkit published in 2015 provides a guide for identifying the level of unmet need for wheelchair accessible housing. This follows a two-step calculation as set out below.

1. The number of households in local authority area x % of all households that are wheelchair user households (regional average %) = μ (i.e. the number of wheelchair user households within a district)

Then a further calculation is undertaken to assess the level of unmet need for wheelchair accessible housing amongst wheelchair households:

2. $\mu \times \%$ of wheelchair user households with unmet housing need (regional average)
= Number of wheelchair user households with unmet housing need

Therefore the calculation in Lancaster is as follows:

1. 60,735 (total households) x 0.03 (3% of households who are wheelchair users in the north west region) = 1822 wheelchair user households in the district
2. 1822 x 0.23 (% of households with an unmet need in the north west region) = 419 households with an unmet need for a wheelchair accessible home

5.24 The figures identify that amongst current needs there may be a need for up to 419 households for wheelchair accessible homes, this does not take account of any future growth in households over the lifetime of the Local Plan. The figure of 3% of households across the region being wheelchair user households also aligns with data from the household survey which identified a need over the next 5 years for 3% of households to have a wheelchair adaptation need.

Get data from CORE lettings re wheelchair needs

The accessibility of current housing stock

5.25 Currently there is no data on the accessibility of housing stock within the district. However, the English Housing Survey helps provide a national picture. The [survey](#) for 2014-2015 identified that less than one in ten (7%) homes in England had all four accessibility features that provide visibility to most people including wheelchairs⁷. These are level access to the entrance, a flush threshold, sufficiently wide doorsets and circulation space, and a toilet at entrance level. Around two thirds of homes now have a toilet at entrance level (64%)⁸ but the presence of the other three features was less common. It is notable from the table below that whilst homes built after 1990 do score significantly better on the provision of all four visibility features the figure is still only 34.3% of modern homes. In 1999 Part M of the building regulations was introduced. This led to a significant increase in new homes with level access (68% of new homes⁹) built after 2001 to comply with regulations.

⁷ English housing survey 2014 to 2015: adaptations and accessibility of homes report, Department for Communities and Local Government, July 2016

⁸ *ibid*

⁹ *ibid*

Table 6: 'Visitability' features, by dwelling characteristics, 2014						
all dwellings						
	number of 'visitability' features present					
	none	one	two	three	all four	all dwellings
						percentages
tenure						
owner occupied	25.7	42	20.1	7.1	5.2	100
private rented	28.9	34.6	18.6	9.9	8	100
local authority	23.1	31.9	20.5	18.1	6.5	100
housing association	18.1	27.6	18.6	17.5	18.3	100
dwelling type						
terraced house	40.6	36.1	13.6	5.3	4.5	100
semi-detached house	33.7	42.3	16	5.5	2.5	100
detached house	8.8	49.5	27.7	8.7	5.3	100
flat	9.5	23.7	25.2	22.1	19.5	100
dwelling age						
pre 1919	34.1	42.6	17.4	5.1	0.7	100
1919-44	33.7	43.8	17.6	4.1	0.9	100
1945-64	30.3	41.9	19.2	7.3	1.2	100
1965-80	20.7	41.8	23.5	10.7	3.4	100
1981-90	21.1	38	23.2	11.1	6.5	100
post 1990	7.5	18.5	18.8	20.9	34.3	100
all dwellings	25.4	38.4	19.7	9.5	7.1	100

Note: terraced, semi-detached and detached dwelling types include bungalows, Source: English Housing Survey, dwelling sample

5.26 Disabled-friendly homes are, by design, cheaper and easier to adapt than any other homes. For example, installing a stair lift in a Lifetime Home can cost £2,400 but if the wall adjacent to the stairs is not strong enough to support a stair lift's weight, the cost of replacing or reinforcing it could be five or ten times the cost¹⁰. Similarly, if a bathroom is big enough for a wheelchair to fit into by design, as they are in M4 (2) and (3), the only cost to adapt the home may be around £300 to install grab bars. However, if a bathroom needs major adaptation work to enable it to be used by someone in a wheelchair (e.g. doors widened and fittings removed and replaced to enable walls to be strengthened) costs could be 30 times higher¹¹. So ensuring there are more accessible homes built in Lancaster will help reduce annual spend on adapting homes.

5.27 Council findings in relation to disabled facilities grants over the past three years have also identified a significant increase in grant awards as set out in the table below.

Table 7: Disabled Facilities Grants 2015-2018						
Year	Grants awarded	Completed	Referrals	Approvals	Average approved grant	Average completed grant

¹⁰ Leonard Cheshire Homes No Place Like Home – 5 Million Reasons to make housing disabled friendly

¹¹ ibid

Table 7: Disabled Facilities Grants 2015-2018						
2015/2016	£557,436.69	122	269	151	£4607.14	£ 5169.51
2016/2017	£997,377.73	190	362	243	£5165.78	£ 5171.41
2017/2018	£1,239,668.79	232	446	281	£5343.40	£5433.24

Source: Lancaster City Council, June 2018

Does the evidence support a need for the optional accessibility standard?

- 5.28 The evidence above clearly identifies a need for accessible homes within the District. The population of the district is ageing significantly with a clear increase in people over 65 and especially those aged 80 and over. These age groups are the most in need of accessible housing. The majority (67%) of older people also want to remain in their home as long as possible and if they are to move would prefer to move within the open market (21%).
- 5.29 However, the need for accessible housing is not solely restricted to older people, there are also people within the district of working age who need suitable accommodation. Estimates identify that around 4,000 to 5,000 (23%) people of working age in the district have a long term illness higher than the average for Great Britain.
- 5.30 When purchasing a home the main consideration at the point of purchase may not be whether it can be adapted in the future. However, circumstances change during life as ageing occurs and mobility decreases, or if people suddenly get ill and have changed needs. It is therefore considered important that the Council plans for housing which is best able to meet these needs. At the present time the best opportunity to do this is through introducing reasonable policy requirements for accessible and adaptable housing via the optional building regulation M4(2).
- 5.31 Whilst at the present time the household survey has identified that around 10% of households have a need for an adaptation within the home. It is important that Local Plan policies particularly those for housing (the average house designed to last a minimum of 60 years according to recent research) plans for future needs in the context of the district's ageing population. Therefore an uplift to 20% is considered reasonable in terms of need for M4(2).
- 5.32 The evidence also points towards a need for around 3% of new homes being wheelchair accessible, reflecting the averages in the region and outcomes of the 2017 household survey. The North West has a much higher proportion of wheelchair user households living in unsuitable accommodation for their needs (23%). However, given the very low level need, the Council considers that it would be best placed to work with Registered Providers to encourage wheelchair accessible and adaptable homes through the affordable housing sector.

What is the impact on viability?

- 5.33 The Planning Practice Guidance requires Local Planning Authorities to consider the impacts of implementing optional housing technical standards locally upon viability of residential development in their area. Therefore should a Local Authority wish to bring forward optional housing standards it is important that they do not compromise residential development being delivered in order that the wider need for housing is met.
- 5.34 To assess the impact on viability, the council in 2017 commissioned consultants Lambert Smith Hampton to undertake a Local Plan Viability Assessment. The first stage of this assessment has now been completed. The assessment considered a range of site typologies in

different market areas across the district and the impact on viability of the cumulative impact of proposed policy requirements.

- 5.35 The Local Plan Viability Assessment used a cost figure of £1,000 per unit to build dwellings to M4(2) standard. This is over and above that within the [EC Harris Cost Impact report](#) from 2014 which identified a cost impact of between £520 and £940 dependent on house type¹². The figure proposed by Lambert Smith Hampton takes account of recent increases in build costs since the report was published.
- 5.36 The Local Plan Viability Assessment (Stage One) identifies that generally across the district 20% of all new market and affordable dwellings being built to M4(2) would be viable. Consideration of strategic site viability is still underway, further consideration through this process will help understand whether M4(2) is viable on the allocations of East and North Lancaster, South Carnforth.
- 5.37 The council intends to provide a threshold of ten dwellings and above to ensure that small schemes are not prejudiced where it may be more difficult to achieve economies of scale and design standards that reflect the optional housing technical standards. Where a developer demonstrates through a transparent and appropriate viability appraisal at application stage that it is not viable to implement M4(2), the council will work with the developer to consider solutions of how a scheme can be made viable with due consideration to policy requirements, land values etc. Such an approach was supported by a number of housebuilders at Regulation 19 consultation.
- 5.38 The costs of implementing M4(3) are significant and the 2014 EC Harris study identified a cost of between £7,764 and £23,052 per dwelling. Without grant support it would be very difficult for any residential scheme within the district to assimilate these costs and still deliver a viable scheme, as such the council does not intend to take forward a requirement for M4(3) in either market or affordable schemes and will instead work closely with Registered Providers to seek to ensure that proposals that incorporate M4(3) are supported.

6.0 Nationally Described Space Standard

Why are space standards important?

- 6.1 Analysis by [LABC Warranty](#) in 2018 found that living rooms now average 17.09sq.m, this represents a drop of 1.64sq.m in the past decade and a decrease from its peak of 24.89sq.m in 1970¹³. Overall house sizes are also being built smaller than since before the 1930's, with household size averaging 67.82 square metres, compared to a high of 83.33 square metres in 1970¹⁴.
- 6.2 Space can be important for all sorts of reasons, it affects how and where people prepare and eat food, how people manage household waste and recycling, what furniture can be stored and its use, people's ability to socialise with guests or other household members, the level of privacy and the ability for homes to be adapted to changing household circumstances¹⁵.
- 6.3 There have been various standards for homes since the 1960's, these include the Parker Morris standard of 1961-1980, English Partnerships Standard 2005-2007, the Housing Quality Indicators of 2007, National Housing Federation Indicative Minimum Dwelling Areas, and then the introduction of the current Nationally Described Space Standards in 2015. The space

¹² Department for Communities and Local Government Housing Standards Review Cost Impacts, EC Harris, September 2014

¹³ Are Britain's Houses Getting Smaller? (New Data), LABC, 10.04.2018

¹⁴ *ibid*

¹⁵ Housing standards: evidence and research Space standards: the benefits, University College London for CABE, April 2010. Prof Matthew Carmona, Prof Nick Gallent, Reetuparna Sarkar

required for a two and three bedroom two-storey property for these different standards is set out in the table below. The Nationally Described Space Standard published in 2015 represents the most comprehensive set of standards of those published providing differentiation based on storeys, bed spaces from 1 bedroom to 6 bedroom properties.

Table 8: Comparison between housing standards		
	2 bedroom 4 person home	3 bedroom 6 person home
Parker Morris (1961-1980)	72 sq.m	92 sq.m
English Partnerships (2005-2007)	77 sq.m	-
HCA: HQI (2007-2014)	67 sq.m	95 sq.m
NHF (2008-2015)	82 sq.m	-
NDSS (2015 -)	79 sq.m	105 sq.m

Source: [One Hundred Years of Space Standards, Julia Park, January 2017](#)

- 6.4 When buying a new home, space is one of the most important factors. A study by [Shelter](#) in 2013¹⁶ identified that 44% of the public would be more likely to support the building of new housing if homes were larger. Research by YouGov in 2010 also identified that 42% of people put the size of rooms as the most important factor when buying a new home. There is a clear perception that new homes are being built with rooms that are too small, this was the main reason (60%) why people are unwilling to choose a new home built in the last ten years¹⁷.
- 6.5 Research has also identified that the UK has the smallest housing in terms of floor space in Europe. There are complex reasons for this which include the removal of space standards in 1980's, the high value of land, and the low number of homes built by public authorities and housing associations¹⁸.
- 6.6 It is also common place in the UK to purchase and consider the purchase of a property based on the number of bedrooms it has rather than floor space. This often results in a lack of understanding over a household's need for space. Whilst the majority of homes in the UK are not fully occupied, between one-quarter and one-third of people are dissatisfied with the amount of space in their homes¹⁹. Lack of storage space, insufficient space for furniture and lack of space in which to socialise are often cited as particular problems²⁰. The Housing Standards Review found that 88% of respondents were in favour of space labelling and 80% were in favour of space standards.

What is the optional standard for internal space?

- 6.7 The [Nationally Described Space Standards](#) were published by Government as an optional housing standard in March 2015 and are meant for use across all tenure types. The standards set out the minimum Gross Internal Area including an allowance for storage space. The standards also seek to ensure that sufficient floor to ceiling height is provided.

The technical requirements are set out below:

- a) The dwelling provides at least the gross internal floor area and built-in storage area (set out in Table);
- b) A dwelling with two or more bedspaces has at least one double (or twin) bedroom;

¹⁶ Policy Briefing April 2013 Little boxes, fewer homes Setting housing space standards will get more homes built, Shelter, April 2013

¹⁷ The Case for Space, The Size of England's New Homes, HOMEWISE, RIBA, September 2011

¹⁸ Quantifying the extent of space shortages: English dwellings, Building Research & Information, Malcolm Morgan & Heather Cruickshank, (2014) , 42:6, 710-724

¹⁹ Resident Satisfaction With Space In The Home A Report for: CABE by HATC Limited & IPSOS Mori, 2009

²⁰ ibid

- c) In order to provide one bedspace, a single bedroom has a floor area of at least 7.5m 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 11.5m;
- 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 1m 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 0.72m in a double bedroom and 0.36m 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.

Minimum gross internal areas and (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	

Table 9: Department for Communities and Local Government: Technical Housing Standards – Nationally Described Space Standard 2015

What do we currently have in place locally regarding internal space standards?

- 6.8 The council does not currently implement standards for new build housing developments within the district through a planning policy. Nevertheless affordable housing within the district has generally been built to standards known as [Housing Quality Indicator](#) standards, slightly below the NDSS in order to secure grant funding from Homes England previously known as the Homes and Communities Agency. Homes England assess schemes on a number of consideration one of which includes internal space and will seek justification where homes proposed for grant are much smaller or larger than the indicators.
- 6.9 The council does apply standards on conversions and studio developments, these do not form part of the policy requirement for Nationally Described Space Standards which relates to new build properties only.

- 6.10 For affordable homes delivered through planning obligations, the council has routinely provided a requirement within S106 agreements that affordable units have to comply with the HCA (now Homes England) Standards relevant at the commencement of the development. However, it has been unclear to what extent Registered Providers are expected to apply these standards on units other than where grant funding has been applied for and any properties securing grant are subject to scrutiny and due diligence checks by Homes England before grant funding is awarded.

What evidence should be considered when assessing whether to implement this technical standard?

- 6.11 According to Planning Practice Guidance, 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;
 - 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.

What evidence has been used to assess whether to implement this optional standard in Lancaster district?

- 6.12 A range of developments were considered that have been completed within the district in recent years. Consideration was then given to the individual house types, their bed spaces and floor areas. This enabled consideration on the basic principle of whether house types were providing sufficient floorspace to meet the NDSS. Whilst this does not consider the full technical aspects of the NDSS it does enable quick consideration of the floorspace of real house types against the NDSS for comparison.
- 6.13 In total ten residential schemes were assessed by a range of local, regional and national housebuilders who had brought forward schemes across the district in recent years. The assessment of schemes identified 90 different house types. In general housebuilders will have a number of standard housing types within their range which they will replicate across different schemes.
- 6.14 In total of the 90 house types, the following composition between number of bedrooms was identified:
- 1 bedroom - 5 house types (1 achieving the Nationally Described Space Standard overall floor area)
 - 2 bedroom - 16 house types (1 achieving the Nationally Described Space Standard overall floor area)
 - 3 bedroom - 31 house types (6 achieving the Nationally Described Space Standard overall floor area)
 - 4 bedroom 38 house types (19 achieving the Nationally Described Space Standard overall floor area)

- 6.15 The above evidence identifies clearly that house types are not currently meeting the Nationally Described Space Standards at present. There were also a significant proportion of homes that were in excess of 10% below the NDSS floorspace, with some in excess of 20% less than the NDSS. Conversely a number of house types were more than 10% greater than the NDSS.
- 6.16 In general, those schemes that may be seen to attract higher sales values were often likely to be larger as would be expected. It is not the purpose of this paper however, to identify those schemes or housebuilders who are building homes more in accordance with NDSS. However, a general trend can be seen that smaller house types such as two and three bedroom market homes and affordable homes were less likely to meet the space standards.

Does the evidence support a need for the optional space standard?

- 6.17 As evidenced above research has identified that space is a key determinant on wellbeing and the way we live. In general local evidence identifies that the majority of properties are not being built to NDSS, this is particularly the case for one, two and three bedroom homes within the District.
- 6.18 Whilst it is understood that properties which meet the NDSS are likely to attract higher sales values, additional space can reduce the need for moving in the future as households are better able to meet their needs within an existing home and social care costs can be reduced as adaptations are able to be undertaken in situ. Older people often would like to downsize in property but may be unwilling to compromise on space. Therefore the evidence identifies a need within the district to adopt a housing standards policy which seeks to ensure all new homes are built to the Nationally Described Space Standard.

What is the impact on viability?

- 6.19 The Local Plan Viability Assessment (Stage One) considered the impact of introducing the Nationally Described Space Standard. The study identified that the impact would generally be positive. As increased sales revenues could be achieved from the increase in floorspace. Consideration of strategic site viability is still underway, further consideration through this process will help understand whether Nationally Described Space Standards is viable on the allocations of East and North Lancaster, South Carnforth.
- 6.21 Where any potential viability appraisal does identify that the impact of introducing space standards would be detrimental to overall scheme viability, this will be considered in the round when determining the whether it is appropriate to require the space standards to be applied to new development. This approach has been supported by a number of housebuilders through consultation during the Regulation 19 consultation.

Conclusion

- 6.22 On balance the need for a policy which requires the Nationally Described Space Standard to be applied within the district is considered to exist, given the limited number of new homes which are built to the standard without a policy in place. Whilst it is accepted that the price of new properties may increase for home purchases through the increased floorspace provided, this is outweighed by the potential benefits to health and wellbeing that arise from increased space as well as the increased ability for homes to be adapted to changing life circumstances. It is also possible that implementing the NDSS will improve marketability and support for new build housing.
- 6.23 Viability evidence at district level also identifies that it is possible to implement the standard

without unduly impacting on scheme viability. Where this is compromised the council will work with developers to achieve solutions that seek to overcome any issues arising.

7.0 Overall Conclusions

- 7.1 Based on the findings of need and viability the Council has prepared policy DM2 (Housing Standards) of the emerging Development Management DPD, setting requirements for:
- All schemes of 10 or more dwellings to be built to M4(2) accessible and adaptable dwellings;
 - All new properties to be built to Nationally Described Space Standards
- 7.2 The Council has not proposed to introduce policy requirements for M4(3) wheelchair accessible or adaptable dwellings, nor has a water efficiency standard over and above mandatory building regulations been proposed.