



Housing Quality Review Addendum 2014

Please note that this Addendum (March 2014) provides an update to certain aspects the Housing Quality Review (2011) and should be read in conjunction with it.

March 2014



Addendum to Southend Housing Quality Review (2014)

Purpose of this Report

This addendum provides an update to the Housing Quality Review (“the Review”) published in March 2011. The Review was prepared as part of the evidence base to inform the proposed housing policies in the Southend on Sea Development Management DPD.

The Review, which this addendum should be read alongside, investigated whether there was a need to introduce a policy which sets minimum space standards for residential development in Southend. It presented a literature review of the most relevant existing evidence base, and revealed the results of some primary research carried out by the local authority to assess the internal floor area of a sample of completed sites of various sizes in Southend. This allowed a comparison to be made between what dwelling sizes have been achieved and delivered in Southend to the minimums for different dwellings and bedroom sizes proposed in the literature.

This addendum highlights the key evidence from the Housing Quality Review (2011), discusses the most recent literature from Government on space standards, and assesses whether the Southend policy approach for minimum residential space standards remains valid and justified to deliver sustainable development in the long term.

Summary of Housing Quality Review (2011)

The Review notes that there has been a trend in the last decade, encouraged in national policy, for higher density developments in urban areas. An outcome of this policy approach has been a notable reduction in unit size (known as internal floorspace) within development, which may also be interlined and potentially exacerbated by an increase in the number of conversions of existing single family dwelling houses into two or more self-contained flats. These factors may have contributed to an increase in the ratio of smaller internal spaces within new dwellings; and this may impact detrimentally on the quality of life of existing and future residents of the Borough.

A review of relevant literature on space standards from the UK and abroad was undertaken. It sought to reveal whether there is a link between dwelling space standards and health, well-being and educational attainment as part of a cost benefit analysis. Key documents considered included *inter alia*:

- Greater London Authority London Housing Design Guide: Interim Edition London Development Agency (2010)
- HCA Proposed Core Housing Design and Sustainability Standards Consultation (2010)

- CABE Housing Standards: Evidence and Research - Mapping Existing Housing Standards (2010)

An appraisal of relevant policy and guidance was also presented which looked at housing standards and quality of life issues. Relevant documents included *inter alia*:

- Housing Corporation (April 2007) minimum and maximum space standards for publically funded housing ; this was linked to the 'Housing Quality Index' (HQI) which ensures that public money is used to deliver an optimum number of units for a site
- Southend on Sea Core Strategy (December 2007)

The CABE Housing Standard Evidence and Research 'Mapping Existing Housing Standards' (2010) also provided a very useful guide to key standards that are currently applied to housing. An informative table may be found on page 23 of the CABE document, which compares the standards adopted by a number of key groups and organisations, which all apply housing space standards by houses types and number of bed spaces. Included in the document were standards set out by:

- Homes and Communities Agency (2010): Space standards proposed by the Homes and Communities Agency, which were out for consultation in the summer 2010
- English Partnerships (2007): These standards were set for all housing delivered on English Partnerships land. They were intended to produce units that appealed to all segments of the population, from single individuals to large families.
- Housing Corporation (2007): Derived from the Scheme Development standards (SDS) and linked to the Housing Quality Index (HQI), these standards set out minimum and maximum space requirements for publicly funded housing.

An assessment was also carried out of minimum residential space standards in a representative sample of new residential development in Southend, which had been approved in a 5 year period (2006-2010). The sample was selected to broadly reflect the proportionate delivery of housing types over an eight year period. Even so, a larger proportion of 3-bedroom houses were assessed as it was considered that this type of accommodation is often seen to offer the type of space required by families and the literature review identified that this family group had significant pressures in terms of space requirements and space availability.

Table 2 on page 52 of the 2011 Housing Quality Review highlighted that internal space of new residential dwellings in Southend varies significantly, particularly for new houses, for example a 3 bedroom house ranges from 76m² to 276m², a two bedroom flat ranges between 56m² and 90m² and a one bedroom flat ranges from 48m² to 93m². Table 3 on page 52 analysed the average gross internal space. Of particular note was the very little

difference between the internal space allowed for a 1 bedroom and 2 bedroom flat. This raises concern as it suggests that internal conditions are being compromised to create an additional bedroom, in what is in essence the internal floorspace of a 1 bedroom flat.

The findings of the Southend sample survey identified a clear local issue in terms of lack of internal floor space for dwellings intended for 3 and 4 occupants i.e. 2 bedroom dwellings. It was identified that a high proportion of this dwelling type delivered by the private market would not meet the minimum internal floor space requirements of the Housing Corporation Standards (2007).

These dwellings, as stated, are mostly 2 bedroom dwellings. In Southend, it was the highest proportion of dwellings (56%) delivered over the survey period i.e. 2006 -2010. The survey shows that 10.7% of all 2 bedroom dwellings, which is 5% of all dwellings in the sample, did not meet the Housing Corporation Standards. As this type of dwelling was a considerable proportion of total dwellings completed in Southend, and a higher percentage of these 2 bedroom dwellings did not meet the Housing Corporation Standards (2007), it suggests that there is justified scope for policy intervention to ensure that dwellings in Southend provide a minimum level of floorspace and bedroom size to improve quality of life for initial and future occupiers. By contrast, all of the dwellings surveyed in the Borough intended for 1 or 2 occupiers i.e. studio or 1 bedroom dwellings or 5+ occupiers i.e. three bedroom dwellings and above would meet the minimum standard set by the Housing Corporation. As such, according to the survey sample, this policy would only really affect a particular dwelling type (i.e. 2 bedroom dwellings), encouragingly the minimum space standards for other dwelling types surveyed had been achieved on a voluntary basis, which clearly demonstrates that their viability had not been compromised in delivering. Even for 2 bedroom dwellings the majority of schemes completed in Southend delivered homes that met the minimum standards and therefore demonstrated that such sizes are deliverable in Southend.

The 2011 Review, therefore, strongly recommended that there may be merit in including a minimum space standard within the Development Management Development Plan Document (DM DPD), to ensure that appropriate internal space would meet the needs of intended occupiers, especially for 2 bedroom dwellings which, according to the survey, do not meet existing space standard good practice guidance. All other sizes of dwelling in the survey met this particular Standard and, therefore, they would be compliant and have minimum impact in terms of viability if this policy was adopted.

Housing Quality Review recommendations:

- Affordable Housing/Market Housing - minimum space standards requirements should be the same for all tenures, i.e. tenure blind, particularly as there is a history of movement of stock between the public and private sector and vice versa and would in essence future proof the supply

- Flexible Space – dwellings should be adaptable, built to accommodate the long term needs of future residents, with rooms that are large enough and flexible enough to be multi-functional
- Quality of Life – provision of social and private spaces and demarcation of space between adults and children, providing space for working from home, designing rooms that benefits from natural light and ventilation
- Functionality – planning application to set out floorspace and how it may be used to meet needs of occupiers, Lifetime Homes Standard, sufficient storage for household items
- Outdoor Provision – space should be useable and large enough for occupiers
- Climate Change – use of natural light to reduce internal energy consumption by providing naturally lit spaces, and to act as a thermal buffer and regulate temperate, as well as providing benefits of passive solar gain and heating. Dwellings should be planned for at least 100 year lifespan to reduce the effect on the climate from construction and building practices

Housing Standards Review (DCLG, August 2013)^{1*}

Summary of sections with relevance to Space Standards

Introduction

The Housing Standards Review carried out in 2013, published by the Department for Communities and Local Government, looked at a rationalisation of the framework of building regulations and local housing standards with a key aim to investigate the potential to reduce the level of administration required and associated costs to house builders.

The purpose of the Review, as stated, is not to stop the housing industry or other bodies bringing their own standards to the market, for developers to utilise on a voluntary basis. It acknowledges that such standards can play an important role in providing information about performance and technical specifications which can inform builders and home buyers alike. However, it considered that prescribed standards may cause a problem when they are not subject to any local cost benefit or viability assessment or local needs assessment.

** At the time of publication of the Addendum to the Housing Quality Review, Southend Borough Council notes the release on the 13th March 2014 the Governments response to the Housing Standards Review (2013) in which it states its intention to develop a ‘National Space Standard’ among other things. The Council will monitor development of this Standard and review its own policies accordingly where necessary.*

Government's intention is to produce 'nationally described standards' which may be adopted through local development plans and neighbourhood plans under current planning powers. With this approach local authorities would need to include a needs test, i.e. the evidence criteria that local planning authorities would have to demonstrate to Planning Inspectors if they wished to apply a particular standard to an area. The aim of these safeguards is to ensure that standards are adopted in plans only where there is a direct justified local need, and where standards would not hinder development.

Although Government currently considers that developing 'nationally described standards' is the best way forward in the short term, it wants to explore further in longer-term the option of fully integrating all the proposed standards into Building Regulations. The Government have invited views on this. It also states that local planning authorities will be encouraged to bring their local plans up to date to align with the new standards, if implemented. The inclusion of any such standard in a local plan would be tested through the examination process.

Affordable Housing

Government has acknowledged that the standards should be capable of application to both affordable and private housing on an equal basis; there is, therefore, no tenure differentiation between the standards. However it is recognised that the needs of affordable housing occupants (in terms of access, disability, space and security standards) tend to be higher than in the private housing market.

Space

The Review considers that a key driver for increased adoption of space standards is the National Planning Policy Framework (NPPF), which requires that local authorities have due regard to the nature of housing development in relation to current and future demand. The NPPF states in paragraph 50 that:

'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:

- *identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.'*

The focus of the Housing Standards Review was therefore to look at the issues in principle and to gather evidence to inform future considerations. The Government affirmed in this document that they did not have a preferred approach on space standards and considered that further work would be necessary to develop improved analysis if a space standard is to be taken forward. It made no commitment to the introduction or use of standards.

The Review also sets out the role that space labelling could play in improving consumer choice in the new housing market, or as an alternative to space standards, and the document sought views on the benefits of standardising application of space standards in order to reduce cost and complexity.

Reasoning for and against space standards

The Review highlights that there are a wide range of views about space standards. Proponents of space standards argue that they are needed to ensure that homes provide adequate space to undertake typical day to day activities, and to avoid health and social costs that arise where space is inadequate. In particular, space standards are seen as a way of ensuring that there is sufficient room to carry out normal daily activities, socialise with family and friends, work from home or study in private and provide storage for general household goods and personal belongings.

There is also evidence, it purports, to support the assertion that England has some of the smallest housing in Europe based on the number of bedrooms in any given property and compared to its floor area, but it has been suggested that because most privately owned homes in England are under occupied (have a spare room) the overall space per person is equal to or better than many other European nations.

It cites that a number of recent reports have highlighted dissatisfaction with internal storage space and access to daylight amongst new home owners and research undertaken by the housing charity Shelter suggests that adopting space standards through local or neighbourhood plans could reduce local resistance to new development as it is seen as a sign of good quality, making it more likely that new homes will meet local people's needs. Even so, the annual home buyer satisfaction survey by the National Home Building Council (NHBC) Foundation shows that overall satisfaction ratings amongst home buyers are at a nine year high which may suggest that new homes are suited to purchasers' needs.

Large parts of the home building industry, as would be expected, take the view that market forces function effectively in ensuring that essential consumer interests are well served and that there is little evidence of new private sector housing failing, or proving unsustainable, on grounds of insufficient internal space. The Review states that some home builders suggest that ambitious density targets set by the previous government forced developers to build smaller homes, a trend that has been reversed since the targets were dropped.

It is also important to consider the impact of space standards on affordability. The Review highlights that new homes are typically set at a price in relation to similar existing homes in local housing markets – with larger homes of any given type attracting higher prices. In practice, this means that requiring all homes to meet a prescribed space standard could raise the entry level price of new housing. This is clearly a potential problem for

purchasers who could be priced out of the market if the higher entry price exceeds their ability to raise finance.

Overall, the Review considers that in many respects the market is performing well in the absence of national space standards and Government's preference remains for market led solutions. Therefore, given the views of the Review Working Group, the Government were to explore through the consultation process whether an industry-led voluntary space labelling scheme could sufficiently address stakeholder concerns or whether a baseline standard may be necessary and what that standard should be.

Possible Approaches

The Review highlights that Government is keen to ensure that home buyers and tenants are well served by the housing market, and that housing needs are suitably met. As such the consultation document sought views as to whether a national space labelling scheme, developed with industry, could assist consumers with comparing the size of new build properties for sale and drive quality in the private sector.

Government also recognises in the Review that there are circumstances where failures or particular conditions within a local housing market (which may not be addressed through market forces alone) could justify intervention through the use of space standards. Government believes that this should not be imposed centrally, but considers that it is right that local communities and neighbourhoods should be able to set out what housing they want, and in doing so, become more supportive of new development in their area. The Government were, therefore, also interested in gauging the extent of support for whether a national space standard (a single standardised approach to space standards) would be seen as beneficial, when linked to access standards, and to gather evidence of current home building practice and the future impacts that the introduction of such a standard might entail.

Space Labelling

The concept of space labelling has been raised by Government in the Review and has been seen as a possible alternative to space standards. The Review states that much if not all information needed to support space labelling is readily available within Energy Performance Certificates or sales particulars, and so would be at little extra cost to industry other than ensuring consistent presentation. It proposes that space labelling would be through a voluntary industry led approach.

The industry working group, associated with the Review, universally endorsed this approach for all new homes for private sale, and favoured a measurement of simple Gross Internal Area in square metres (m²) combined with room areas (m²) and dimensions in metres (M). It was suggested that this could be delivered by inclusion within the Home

Builder Consumer Code which would give homebuyers the right to recourse if information was not provided in the appropriate form or later proved to be inaccurate.

Space Standards

The Government's preferred approach, as stated within the Review, would be for market led, voluntary mechanisms such as space labelling, in order to meet consumer needs rather than mandatory application of space standards. However, they are also investigating space standards on the basis that any requirements in a local plan could, in future, demonstrate that they do not unduly affect viability, and would need to be justified by suitably robust evidence.

The Review highlights that current space standards adopted by local authorities vary from simple minimum internal floor areas for a small number of typical home types to highly detailed standards setting out requirements for individual room sizes, widths and specific furnishing requirements.

One way of addressing the problem of many different locally set standards would be to develop a single national minimum space standard for use by all local authorities. This would reduce learning and development costs across local authorities and industry and have the effect of providing a single national model for compliance. This would also enable designers and developers to gain 'type approval' of standard internal layouts so that the same certified compliance is accepted across all local authorities in England.

The requirements of any proposed space standard proposed by the working group relate only to the internal aspects of the home – this includes internal storage space, space for internal storage of recyclable waste and potentially the definition of minimum size for single and double bedrooms. Considerations of external private space, overlooking, 'daylighting', 'sunlighting', aspect and external waste storage, the Review states, would be outside the scope of this standard.

The Review claims that opinions are divided as to what tenure of housing space standards should be applied to. Many, but not all, affordable housing organisations, designers and housing professionals believe that a minimum space standard is vital and should be applied across all tenures, and at all levels. Similarly many home builders, but not all, strongly believe that the market should remain free to meet local demands and that space standards should not be applicable to private housing development at all. The Government is of the view that a distinction should not be made between housing tenures in terms of what standards should apply.

A model standard, developed with an Industry working group, is included in 'Section 2' of the 'Housing Standards Review: Illustrative Technical Standards developed by the Working Groups' (August 2013) summarised below. It includes an introduction which sets out how the standard could be structured.

Costs and Viability

Government considers within the Review that the evidence it has been able to gather to date is not sufficiently detailed at this stage to conclusively demonstrate impacts on private and affordable development. Government states that if it does take forward the development of a joint national space and access standard set, it will be vital that both developers and local authorities have confidence that viability has been properly assessed on the basis of established and accepted costs.

Next steps

Following the consultation, the Government will analyse responses and consider a way forward. Subject to the consultation, the current intention is to issue a National Described Standards document as soon as possible, alongside a final impact assessment, analysis of consultation responses, and the Planning Policy Statement setting out how housing standards should henceforth be treated in the planning system.

Housing Standards Review: Illustrative Technical Standards developed by the Working Groups (August 2013) Department for Communities and Local Government

Summary of sections with relevance to Space Standards

Introduction

The Housing Standards Review: Illustrative Technical Standards (referred to herein as the 'Technical Standards document') presents a new Accessibility Standard that has been proposed by the Housing Standards Review working group, seeks to coordinate, simplify and update current accessibility standards into a single three tier set of requirements applicable to new homes of any tenure.

The proposals in both the Housing Standards Review consultation document and the Technical Standards document were assembled by the working groups and were considered illustrative to inform debate during the consultation.

The requirements proposed are described at three distinct performance levels that provide increasing benefit in terms of accessibility.

- Level 1 - represents a potential future version of Part M of the Building Regulations and homes will provide adequate accessibility for most people,

including many older people, and basic visitor access for people who use wheelchairs.

- Level 2 - represents an intermediate accessible and adaptable housing standard as an alternative to such standards as Habinteg housings Associations' Lifetime Homes Standard.
- Level 3 - represents a revised version of the Wheelchair Housing Design Guide, 2nd Edition 2006, written by Habinteg Housing Association with Stephen Thorpe. As the highest tier it will be appropriate for a small but important proportion of new homes. Level 3 homes will provide very good accessibility for most people, including the majority of wheelchair users.

Unless otherwise stated, the Level 3 requirements within this Technical Standards document apply to both wheelchair accessible and wheelchair adaptable housing.

Space Standards

This standard deals with internal space within new dwellings. The Technical Standards document sets out what the working group considered is reasonable minimum requirements for the gross internal (floor) area of new dwellings at a defined level of occupancy and provides minimum floor areas and dimensions for key parts of the home, including bedrooms and storage. It also highlights that the proposals are illustrative, to inform debate during the Housing Standards Review consultation, and that they are not Government policy.

As well as responding to a range of need, the approach outline in the Technical Standards document supports market diversity and consumer choice at local level by covering a comprehensive range of one, two and three storey dwelling types with one to six bedrooms.

Further variations, including the addition of extra bathrooms and en-suite showers, it states may be accommodated by applying the methodology used to generate the Gross Internal Floor Areas, which is described in the Appendix to the Technical Standards document.

The wide range of dwelling types covered by the space standard described could make it suitable for all tenures and allows for homes to be occupied under different forms of tenure over time, thereby increasing flexibility for the needs of various potential future occupiers.

Status of space standards

If this approach was implemented, whereby a local authority chooses to apply a space standard through local planning policy, it should be the standard set out in the Technical Standards document. It states that Level 3 Space Standards, which are described below,

should only be required for wheelchair accessible or wheelchair adaptable housing (Level 3 of the accessibility standard). This Space Standard cannot be applied independently of the Accessibility Standard.

With this model approach the required minimum Gross Internal Areas increase incrementally from Level 1 through to Level 3 to reflect the spatial implications of the larger bathrooms and WCs, and the increased circulation and activity zones that are required by the Accessibility Standard. This space is additional to that required to accommodate generic furniture.

The principles behind each Level of the Space Standard can be summarised as follows:

- **Level 1 Space Standard** provides enough space to accommodate the minimum amount of furniture, fittings, activity and circulation space considered necessary to carry out a typical range of daily activities and meet the basic requirements of Level 1 of the Accessibility Standard.
- **Level 2 Space Standard** provides enough space to accommodate the same furniture and fittings as Level 1 and increase activity and circulation space (both within and between rooms) to cover the additional spatial implications of Level 2 of the Accessibility Standard and a straight stair.
- **Level 3 Space Standard** provides enough space to accommodate the same furniture and fittings as Levels 1 and 2 and additional space to charge and store a wheelchair, install a home-lift, enlarge the kitchen and bathroom and provide the extra activity and circulation space (both within and between rooms) needed to meet Level 3 of the Accessibility Standard.

Applying and using space standards

The model space standard sets out a range of minimum Gross Internal Areas which are capable of accommodating a standard range of activities, using a standard set of internal furniture and assuming a given number of people are living in that home.

The type of home is expressed as a combination of bedrooms (1b = 1 bedroom) and the number of people that can be accommodated by the bed spaces in the dwelling (expressed as p=person bed spaces). A 2 bedroom home with a double and single bedroom would therefore be expressed as 2b3p (two bedrooms, 3 persons).

The Table A1-A3 (p.50 of the technical standards document), which may be found in the Appendix A to this Addendum, provides breakdown for all types of dwellings and size at the three different level summarised herein. Annex B2 (p.56) of the Technical Standards document shows 'furniture of use in demonstrating compliance with space standards'. It is split into three parts showing the most common type of layout for single storey dwellings (flats and bungalows), two storey dwellings (typically houses and maisonettes) and three storey homes (typically houses). This is necessary to reflect the additional spatial impact of

stairs and the need for entrance level WC's and other facilities required by the accessibility standards that do not affect one storey dwellings.

To accommodate the specific requirements of the three level accessibility standard, the space standard is also defined at three levels (Level 1, Level 2 and Level 3). This is necessary because whereas a space standard tends to define activity spaces, accessibility standards tend to define circulation, bathroom and additional spatial requirements in order to meet varying needs. For instance, Level 3 space standards are specifically designed as a guideline for wheelchair adaptable accommodation (Level 3 accessibility standards). The Review's industry working group unanimously supported co-ordinating accessibility standards and space standards in this way.

Methodology for generating the minimum gross internal floor areas

The minimum Gross Internal Areas in Table A1 (Appendix A to this Addendum) are determined by a combination of the space needed to accommodate the furniture, detailed in ANNEX A2 of the Technical Standards document (*which is derived from the Housing Quality Indicators and the London Housing Design Guide*), and the additional requirements of the proposed Accessibility Standard. They reflect the individual room areas and the amount of general circulation and storage space needed to accommodate these cumulative requirements in a range of dwelling types and sizes.

In simple terms, more people need more space. However, the relationship between increased occupancy and extra space, the Technical Standards document states, is not precisely linear because of other variables which affect the amount of space needed but are not directly linked to occupancy. It discusses in further detail the values of each variable and how they are applied in each case.

Compliance and assessment

If the requirements were applied in practice the Technical Standards states that planning applications should provide a complete breakdown of dwelling types, by tenure, and provide a floor plan of each dwelling type at scale at 1:100 or 1:50. Each plan should show the number of bedrooms and bed spaces provided (for example 3b4p), the gross internal floor area in m², the floor areas of all rooms and storage cupboards in m². Detailed bathroom and WC/cloakroom layouts would be required in sufficient detail to demonstrate how the spatial implications of the Accessibility Standards have been met. Fully furnished layouts of other rooms would also be required, where necessary, to demonstrate that the Accessibility Standard has been met.

Status

Whilst the Technical Standards document sets out a 'model' space standard to inform debate within the scope of the Housing Standards Review, it should be noted that this

represents an initial model only. The accompanying 'Impact Assessment' suggests a range of uncertainty as to the potential overall impact of a space standard, including on private and affordable housing costs.

Government intends to undertake further analysis, development and costing following closure of the Housing Standards Review consultation, if it is decided to take forward further work on a national standard.

A Report from the Housing Standards Review Challenge Panel: Towards More Sustainable Homes (August 2013)

Summary of sections with relevance to Space Standards

This Report was commissioned by The Challenge Panel, which represents four independent advisers from across the construction sector who were commissioned by Government to review the current system of building regulations and standards for housing in England and to advise on how the regulatory system can be improved to work more efficiently.

They were tasked with critically examining the complex system of voluntary standards and other standards that Local Authorities are currently able to apply in local plan policies and through planning conditions, and to comment on and, if appropriate, challenge the outcomes of the Housing Standards Review Group during the review process.

The Report states that there is a proper and effective role for national and local Government in driving better performance in housing development and quality and in the use of standards and regulation in delivery of national policy. However, they consider that the case for rationalising and reducing the regulatory burden on new housing is overwhelming.

In summary, Challenge Panel's opinion is that a unified set of single minimum standards is needed for housing entitled 'Sustainable Housing Standards' under the headings of Place, Space, Access, Performance and Well-being. They consider that these should be embedded into Building Regulations where necessary and practicable, with labelling, product controls, warranties and insurance also used to drive improved performance.

In addition, consumer labelling should be introduced for Space, Environmental Performance and Accessibility which the Panel believes would provide a mechanism for driving improved performance and quality above baseline requirements.

Space Standards and Consumer Labelling

The Panel considered that the work of the Review had made good progress but should go further down the path of simplification and reform to ensure that barriers to growth and

innovation are lifted. In relation to space, their opinion was that there should be new minimum performance criteria such as minimum floor areas and bedroom sizes based on functionality to create a level playing field in housing which increasingly will be tenure neutral. In particular they cite the blurring of tenures between owner occupation and private rental sectors, and change in the way social housing is now funded as being a 'game changer'.

They also considered that consumer 'labelling' of homes at the point of sale should be introduced by industry with Government encouragement for Space, Environmental Performance and Accessibility. This could make a positive difference to space and other quality standards for private sale housing and drive improved performance through customer demand.

The Panel recognise the difficulties faced by the Housing Standards Review Working Group on the subject of Space Standards and acknowledged that it was a challenge to achieve a consensus between all parties. Nevertheless after considering the debates, the Panel believed there is a national policy imperative for baseline standards in regulation in order to create a level playing field across all tenures. They agree with the majority view that space standards in new homes should be improved and homes should be robust for changing tenure requirements over their lifetime, particularly in view of a low or no grant environment for social housing.

In essence, the Challenge Panel, commissioned by the Secretary of State on behalf of the Department for Communities and Local Government, believe minimum baseline performance criteria in the form of bedroom sizes or floor areas based on functionality should be set nationally in Building Regulations. They don't consider that an option should be put forward for Planning Authorities to choose to implement a local standard.

Revised Proposed Submission Development Management DPD

Status of DPD

The 'Development Management' DPD (DM DPD) sets out the Borough Council's policies for positively managing development in Southend and will be used to assess and determine planning applications. The DM DPD provides the framework in which to manage Southend's built environment and ensure successful place-making to ensure that the Borough is a place where people want to live work and enjoy.

To reach this stage of plan preparation, the Council has assembled a comprehensive evidence base. There has also been extensive discussion and consultation, over several years, on the issues and principles underlying the policies in the DM DPD. This is the second Proposed Submission DM DPD to be published for consultation purposes.

Following publication of the first Proposed Submission DM DPD in March 2011, the National Planning Policy Framework (NPPF) was published in 2012. As a result additional evidence base work has been undertaken and a number of amendments have been made and reflected in the latest revised version of the DM DPD to ensure it is in conformity with national policy and guidance.

Policy DM8 Residential Standards

The publication of the NPPF (March 2012), the Housing Standards Review Consultation (August 2013) and associated documents presented herein, as well as representation made on the previous version of the DM DPD, have resulted in amendments to Policy DM8 Residential Standards. In particular, the NPPF highlighted in paragraph 50 that *'to deliver of wider choice of quality home, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand'*.

The Southend Housing Quality Review (2011) includes a useful table in 'Appendix 2: Residential Standards', which summarised minimum space standards proposed by various bodies and groups identified in its associated literature review, referred to herein. 'Appendix 2' presented the minimum 'gross internal area' (GIA) in m² against various dwellings types and sizes. Appendix 2 has been updated in this Housing Quality Review Addendum to reflect the additional proposals in the Housing Standards Review: Technical Standards (2013) document and is presented in Table 1. In addition, the table shows the proposed minimum housing standards in Policy DM8 for the Revised Proposed Submission DM DPD (March 2014) and the Superseded Proposed Submission DM DPD (March 2011) for comparison, as well as the Housing Standards Review Technical Standards (March 2013) which accompanies the Government's main consultation document.

The Superseded Proposed Submission DM DPD expressed the residential space standards simply by the number of 'occupants' in a property and the number of storeys, but did not distinguish the number of bedrooms that that would accommodate the occupants. All other examples shown in the table and discussed in the literature review for the Housing Quality Review (2011), expressed space standards by dwelling type, number of bedrooms and bedspaces i.e. occupants and number of storeys. Therefore, to provide further clarity and to allow ease of use as well as comparison with other examples of standards, the 'occupancy' focused space standards, used in the Superseded Proposed Submission DM DPD 'Table 3' in Policy DM8, have been translated into the approach applied elsewhere. It is considered that this approach is good practice and will provide much greater clarity for local authorities and those submitting planning applications for development.

Table 1: Residential Space Standards

Categories		HCA Proposed Core Housing Design and Sustainability Standards Consultation	GLA (Housing Design Guide) : 2010	English Partnerships (Places Homes People)	Housing Quality Indicator: Housing Corporation		Irish Standards	Sunderland Housing Group: Swing a Cat		Parker Morris	1949 Standard	Housing Standards Review Consultation – Level 1 approach	Revised Proposed Development Management DPD	Superseded Proposed Development Management DPD
Date		March 2010	2010	November 2007	Min	Max	2007	Min	Max	1961	1949	2013	March 2014	March 2011
Flats and or one storey dwellings	1b1p				30	35					27.9	38	30	30
	1b2p	48	50	51	45	50	45	40	57	43		47	45	45
	2b1p										32.5			
	2b2p										46.5			
	2b3p	61	61	66	57	67	63	57	80	58		60	57	57
	2b4p	70	70	77	67	75	63	57	80	58		69	67	67
	3b4p		74		67	75	76	65	90	71		73		
	3b5p	86	86	93	75	85	86	65	90	80		84	75	75
	3b6p		95		85	95	94	65	90			93	85	85
	4b5p		90		75	85		72	102		79	88		
	4b6p	99	99	106	85	95		72	102	87	83.6	97		
	4b7p											106		
	4b8p											115		
	5b6p											101		
	5b7p											110		
5b8p											119			
2 storey dwelling	2b3p	71		66			70	57	80			68	66	
	2b4p	80	83	77			80	57	80	77	72	77	77	
	3b4p		87				83	65	90			81		
	3b5p	96	96	93	82	85	92	65	90		85.6	90	82	82
	3b6p				95	100						99	95	95
	4b5p		100		82	85		72	102			94		
	4b6p	109	107	106	95	100		72	102	95	97.1	103		
	4b7p				108	115						112	108	108
	4b8p											121		
	5b6p				95	100						107		
	5b7p				108	115						121		
5b8p											125			
3 storey dwelling	3b4p											86		
	3b5p	101	102	93	85	95	102	65	90	96	95.3	95	85	85
	3b6p				100	105						104	100	100

	4b5p		106		85	95		72	102			99		
	4b6p	114	113	106	100	105		72	102	100	106.4	108		
	4b7p											117		
	4b8p											126		
	5b6p											112		
	5b7p											121		
	5b8p											130		
	6b7p											125		
	6b8p											134		

Source: Housing Quality Review (March 2011) and Housing Standards Review Technical Standards (August 2013)

Comparison of Residential Space Standards (Table 1)

To put the minimum space standards detailed in the Revised Proposed DM DPD (March 2014) into context is useful to show how they compared to other space standards that have been, and are currently, applied—and those that are being used for illustrative purposes in the Housing Standards Review (August 2013) to inform the debate about the application of a national standard. Table 1 above provides a colour coding system to compare the Revised Proposed Submission DM DPD (March 2014) with those discussed in the literature review in the Housing Quality Review (March 2011), the previous version of the DM DPD i.e. the Superseded Proposed DM DPD (March 2011) and the Housing Standards Review (August 2013). A 'green cell' indicates that the other standards for a particular category of dwelling i.e. the type, size and number of stories have a higher minimum requirement than that proposed in the Revised Proposed DM DPD, a 'yellow cell' indicates that the other standards have an identical minimum requirements and a 'red cell' indicates that they have a lower requirement. A 'blue cell' indicates that a standard has not been applied to this dwellings category by a particular body or group and a 'white cell' indicates that a dwellings category has not been included in the Revised Proposed DM DPD (March 2014) Policy DM8.

The most notable observation from Table 1 is that in the majority of cases the minimum internal floorspace standards proposed in the Revised Proposed DM DPD Policy DM8 is lower than those proposed by other bodies and organisation, including the Level 1 approach in the Housing Standards Review Technical Standards document indicated by the number of 'green cells' highlighted. There are only a number of examples of 'red cells' indicating that another standard has a lower requirement than proposed in Policy DM8. However these only relate to some individual standards of Sunderland Housing Group, as well as elements of early examples of space standards including the Parker Morris Standard from 1961. Another notable aspect of Table 1 is are the three columns of 'orange cells', which illustrate the continuity of minimum floor space figures used in the Superseded Proposed and the Revised Proposed DM DPD, but also the good practice standard, 'Housing Quality Indicator': Housing Corporation (April 2008), which has been used an appropriate benchmark from which to apply a standard to development in Southend. Also noteworthy is the inclusion of two dwellings category standards from 'English Partnerships: Places, Homes, People' (November 2007) which capture two categories which were not included within the Superseded Proposed Submission DPD and the Housing Quality Indicator, which was considered as being a category of development which may be marketed in Southend.

Viability and Policy DM8: Residential Standards

The NPPF, paragraph 174, states that the cumulative impact of local planning authority standards and policies "should not put implementation of the plan at serious risk, and

should facilitate development throughout the economic cycle". A Combined Policy and Viability Study (the 'Viability Study') (September 2013) was commissioned by the Council to contribute towards its evidence base to inform the emerging Development Management DPD and Southend Central Area Action Plan. The study assesses the viability of the Council's draft planning policies and standards, alongside the adopted Core Strategy and other relevant national policies, in line with the requirements of the NPPF and the Local Housing Delivery Group guidance 'Viability Testing Local Plans: Advice for planning practitioners' (June 2012).

The appointed consultant and the Council undertook a sifting exercise of the aforementioned documents, as part of the Study, to identify which policies might have cost implications for development. The Policy Sifting exercise is detailed in Appendix 2 of the Viability Study. It revealed for Policy DM8: Residential Standards that there were no additional cost implications related to good design of schemes and, therefore, these should be incorporated within base build costs. The costs of making units wheelchair accessible was considered to be broadly neutral and was more of a design and unit size issue. The Viability Study states that the 10% wheelchair requirement should be accommodated within schemes by varying unit sizes to accommodate the additional floorspace required for turning circles. It also states that the appraisals have taken into account the indicative residential space standards to inform the size of units for the different typologies that have been tested to assess the effect of the 'added costs' such as affordable housing and lifetime homes. The study, therefore, tested the viability of the cumulative impact of the existing and emerging policies and focused on added costs where the emerging policies set requirements exceed Building Regulations or what might otherwise be considered to be acceptable in planning terms.

The Study revealed that many developments could viably provide all or a large majority of the Council's planning policy requirements. Nevertheless, it also revealed that some (hypothetical) development typologies tested were unviable in certain circumstances owing to market factors, rather than the impact of the Council's proposed policy requirements and standards. The Viability Study suggests that such development schemes are not likely to come forward until market conditions change, and their current 'unviable' status should not be taken as an indication that the Council's policy requirements cannot be accommodated. Indeed, the Council has seen development, similar to typologies identified within the Study as being 'unviable', come forward in the Borough over the last five years. In this regard, it is important to highlight that on a site specific level there will be a range of factors determining whether a developer brings a site forward or not.

In some cases, and with respect to the cost implications of Policy DM8 (Residential Standards) i.e. the requirement for homes to be built to Lifetime Homes Standard, the Viability Study identified that these do have cumulative impact on the viability of development, particularly in the lower value areas of the borough. On this basis it was

recommend that the Council applied the Lifetimes Homes requirement in Policy DM8 flexibly, i.e. subject to viability, to allow for the deliverability of developments. This would allow the Council to strike a balance between achieving its sustainability objectives, including meeting needs for affordable housing, whilst also demonstrating that these policy standards do not put implementation of the plan, including its growth targets, at serious risk.

Summary and Conclusions

This addendum has reiterated key evidence from the Housing Quality Review (2011), considered the most recent literature from Government on space standards within the Housing Standards Review (2013) and associated documentation summarised herein, and assessed whether the Southend policy approach for minimum residential space standards remains valid and justified to deliver sustainable development in the long term.

The Housing Quality Review (2011) investigated whether there was a need to introduce a policy which sets minimum space standards for residential development in Southend. It presented a literature review of the most relevant existing evidence base. It noted reduction in unit size (known as internal floorspace) within developments in the last 10 year period, which may have been interlined and potentially exacerbated by an increase in the number of conversions of existing single family dwelling houses into two or more self-contained flats. It also sought to reveal whether there is a link between dwelling space standards and health, well-being and educational attainment as part of a cost benefit analysis

In addition the Council carried out some primary research to assess the internal floor area of a representative sample of new residential development in Southend, which had been approved in a 5 year period (2006-2010). It was noteworthy that there was very little difference in size of internal floorspace created for 1 bedroom and 2 bedroom flats. This raises particular concern as it suggests that internal conditions are being unduly compromised to create an additional bedroom, in what is in essence the internal floorspace of a 1 bedroom flat, and identified a clear local issue in terms of lack of internal floor space for dwellings intended for 3 and 4 occupants that didn't meet Housing Corporation Standards. The dwellings that didn't qualify for this Standard represented 10.7% of all 2 bedroom dwellings and 5% of all dwellings in the sample.

It is considered that this evidence adds considerable weight to the justification and need for policy intervention to ensure that these below Standard dwellings provide an appropriate minimum level of internal floorspace and bedroom size, which may improve quality of life for immediate as well as future occupiers. It is noteworthy that all dwellings surveyed intended for 1 or 2 occupiers or 5 and above would meet the minimum standard set by the Housing Corporation and set out in Policy DM8 Residential Standards in the

Revised Proposed DM DPD (March 2014). Therefore, it would indicate that the issues clearly relates to a particular type and size of dwelling.

The Government has raised this issue in the Housing Standards Review (August 2013) and associated documentation. The Housing Standards Review consultation was published by Government to examine this issue in principle, amongst others, to gather evidence to inform future considerations. The Government stated in this Review that did not have a preferred approach to space standards and considered that further work would be necessary to develop improved analysis if a national space standard was to be taken forward. Therefore, it has made no firm commitment to the introduction or use of standards. The associated Technical Standards document set out what the Housing Standards Working Group considered was reasonable minimum requirements for the gross internal (floor) area for various dwelling types. It declared that the proposals, although technically robust, were purely illustrative to inform debate during consultation.

In respect of local standards the Review considered that standards may cause issue where they are not subject to any local cost benefit, viability assessment or local needs assessment. Local planning authorities, however, would have to demonstrate to Planning Inspectors, as they do now, if they wished to apply a particular standard to an area. These safeguards ensure that standards are adopted in plans only where there is a direct justified local need, and where standards would not hinder development.

Interestingly, the Viability Study for the Revised Proposed Submission DM DPD indicated that internal space standards were not considered to be 'added costs' unlike Lifetime Homes Standards or affordable housing requirements and therefore were not tested primarily as part of the appraisal process for the proposed typologies in the Viability Study. The Viability Study stated that there were no additional cost implications related to good design of schemes and, therefore, these should be incorporated within base build costs. Moreover it stated that the costs of making units wheelchair accessible was considered to be broadly neutral and was more of a design and unit size issue. On this basis it was recommended that the Council applied the requirements sought by the Lifetimes Homes requirement in Policy DM8 flexibly, i.e. subject to viability, to allow for the deliverability of developments.

The Housing Standards Review (2013) also highlights that minimum space standards requirements should be the same for all tenures, i.e. tenure blind, particularly as there is a history of movement of stock between the public and private sector and vice versa and would in essence future proof the supply

Furthermore the Challenge Panel, commissioned by the Secretary of State to look into the work carried out under the Housing Standards Review, was of the opinion that a unified set of single minimum standards is needed for housing entitled 'Sustainable Housing Standards' under the headings of Place, Space, Access, Performance and Well-being.

They also considered that consumer 'labelling' of homes at the point of sale should be introduced by industry with Government encouragement for Space, Environmental Performance and Accessibility.

In conclusion, the evidence suggests that there is clear scope and justification for inclusion of a policy on residential standards in the Revised Proposed Submission DM DPD (March 2014). The examples of best practice from the literature review in the Housing Quality Review (2011) have described the clear benefits of having a minimum internal floorspace standard for different dwellings types and sizes, and the benefits of ensuring that appropriate spaces are provided within them. The Housing Standards Review consultation, although intentionally inconclusive and only intended to add to the debate, has carried out a considerable amount of detailed technical work to understand requirements for accessibility and space standards within all types of dwellings, including those that need to be flexible and adaptable to cater for wheelchair users and less abled bodied occupants. The Housing Standards review has also stated that if a national space standard were introduced in the future they would be tenure blind.

In addition, the primary research in Southend has shown that most dwellings types in new developments are meeting the space standards proposed by lead bodies involved in setting these standards for affordable housing. Clearly, if most dwellings in Southend are already meeting the residential standard proposed in Policy DM8 then there would not appear to be an issue of viability, and the recommendations presented in the Southend Viability Study (2013) add further weight to this argument.

It has been established by the NPPF that local authorities are charged with delivering high quality homes and should identify the size, type, tenure and range of housing to create sustainable and inclusive communities. In setting a policy for local residential standards Southend Borough Council is, therefore, fulfilling its obligation to ensure that there are decent homes for the local community in the absence of a national space standard. In essence, this policy will ensure that the minority of properties in Southend that are current being built below a well-established and accepted industry benchmark, as well as an exploratory minimum national space standard, will in future be delivered to level where they will provide a quality living space for their size and type, and which will not affect the overall viability of a development.

Appendix A: Housing Standards Review: Illustrative Technical Standards developed by the Working Groups (August 2013) Department for Communities and Local Government.

Table A1 – A3

Table A1: Overall Internal Areas

Minimum Gross Internal Floor Areas in Square Metres

Flats or Other Dwelling on One Floor								
LEVEL	1	2	3	LEVEL		1	2	3
Studio	38	39	48	1b1p	1 bed space	38	39	48
1 bedroom	47	48	58	1b2p	2 bed spaces	47	48	58
2 bedrooms	60	61	73	2b3p	3 bed spaces	60	61	73
				2b4p	4 bed spaces	69	70	87
3 bedrooms	73	74	92	3b4p	4 bed spaces	73	74	92
				3b5p	5 bed spaces	84	86	103
				3b6p	6 bed spaces	93	95	113
4 bedrooms	88	90	108	4b5p	5 bed spaces	88	90	108
				4b6p	6 bed spaces	97	99	118
				4b7p	7 bed spaces	106	108	128
				4b8p	8 bed spaces	115	117	138
5 bedrooms	101	103	123	5b6p	6 bed spaces	101	103	123
				5b7p	7 bed spaces	110	112	133
				5b8p	8 bed spaces	119	121	143

Table A2: Overall Internal Floor Areas

2 Storey Houses or Other Dwellings on Two Floors								
LEVEL	1	2	3	LEVEL		1	2	3
2 bedrooms	68	74	94	2b3p	3 bed spaces	68	74	94
				2b4p	4 bed spaces	77	83	104
3 bedrooms	81	87	109	3b4p	4 bed spaces	81	87	109
				3b5p	5 bed spaces	90	96	120
				3b6p	6 bed spaces	99	105	130
4 bedrooms	94	100	125	4b5p	5 bed spaces	94	100	125
				4b6p	6 bed spaces	103	109	135
				4b7p	7 bed spaces	112	118	145
				4b8p	8 bed spaces	121	127	155
5 bedrooms	107	113	140	5b6p	6 bed spaces	107	113	140
				5b7p	7 bed spaces	121	122	150
				5b8p	8 bed spaces	125	131	160
6 bedrooms	120	126	155	6b7p	7 bed spaces	120	126	155

				6b8p	8 bed spaces	129	135	165
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Table A3: Overall Internal Floor Areas

3 Storey Houses Or Other Dwellings On Three Floors								
LEVEL	1	2	3	LEVEL		1	2	3
3 bedrooms	86	93	119	3b4p	4 bed spaces	86	93	119
				3b5p	5 bed spaces	95	102	130
				3b6p	6 bed spaces	104	111	140
4 bedrooms	99	106	135	4b5p	5 bed spaces	99	106	135
				4b6p	6 bed spaces	108	115	145
				4b7p	7 bed spaces	117	124	155
				4b8p	8 bed spaces	126	133	165
5 bedrooms	112	119	150	5b6p	6 bed spaces	112	119	150
				5b7p	7 bed spaces	121	128	160
				5b8p	8 bed spaces	130	137	170
6 bedrooms	125	132	165	6b7p	7 bed spaces	125	132	165
				6b8p	8 bed spaces	134	141	175

Notes:

1. Space for one WC/cloakroom (in addition to the bathroom) included for:
 - Level 1 and Level 2 homes on one floor designed for five people and above
 - Level 3 homes on one floor designed for four people and above
 - all homes on two or more floors
2. Areas with headroom below 1500mm should not be included in the Gross Internal Areas.