

**LOCAL PLAN REVIEW DEVELOPMENT STRATEGY OPTIONS AND POLICY OPTIONS -
JANUARY TO MARCH 2022**

SUMMARY OF RESPONSES TO Q7

Q7 - DO YOU AGREE WITH THE PROPOSED POLICY ON SPACE STANDARDS? IF NOT, WHY NOT?

A summary of the issues raised in the comments received are set out below:

Summary of Comments	NWL Officer Response
The proposed approach allows flexibility should space standards change over plan period	Comments noted
The policy should incorporate 'change of use' as well as conversions.	Comments noted
Space standards are important as lack of internal space and overcrowding is associated with negative implications on mental wellbeing, psychological safety (due to a lack privacy/personal space) and health outcomes, lower educational attainment and family tensions. Working from home is now more common following Covid-19.	Comments noted
It is important to note that there are likely to be other factors also that could impact on land supply, including the impacts of the Government's most recent cycle infrastructure design guide, Local Transport Note 1/20 and its general encouragement for segregated cycle routes. A reference to this would be good.	These comments relate to urban design rather than internal space standards and are therefore more relevant to design policies and the Council's authority-wide Design Code which is in the process of being prepared.
<p>Viability</p> <ul style="list-style-type: none"> • The impact of introducing NDSS needs to be factored into a whole Plan viability assessment. • The proposed policy needs to be balanced alongside changes to the Building Regulations, response to climate change and biodiversity net-gain which will also add to the cost of developing sites. • The Council will need to be satisfied that the selection of sites that underpin its delivery strategy remain viable following the application of the NDSS. 	The policy will be tested as part of a whole plan viability assessment at Regulation 19 stage. This will be in accordance with guidance and will be prepared to ensure that "policies are realistic and the total cost of all relevant policies is not of a scale that will make the plan undeliverable" (PPG, Reference ID: 61-039-20190315).

Impact on affordability and customer choice

The following response is typical of many of the concerns raised by developers/agents/landowners on this issue:

“There is a direct relationship between unit size, cost per square metre (sqm), selling price per sqm and affordability. The Council’s policy approach should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provided a good, functional home. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing. An inflexible policy approach imposing NDSS on all housing removes the most affordable homes and denies lower income households from being able to afford homeownership. The introduction of the NDSS for all dwellings may mean customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs with the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. The Council should focus on good design and usable space to ensure that dwellings are fit for purpose rather than focusing on NDSS.”

One developer suggested:

“...any evidence based policy [should] seek a proportion of homes to be NDSS compliant rather than every home so that consumers can continue to prioritise what is important to them when making house purchasing decisions.”

“[The NDSS] allows for different combinations of single and double/twin bedrooms to be reflected in the minimum Gross Internal Area. The breakdown of the minimum Gross Internal Area therefore allows not only for the different combinations of bedroom size, but also for varying amounts of additional living, dining, kitchen and storage space; all of which are related to the potential occupancy” (NDSS, paragraph 5).

There are different space/size options for houses with the same number of bedrooms, for example:

- a two bed home can be designed as a one storey or two storey dwelling and with either three or four bedspaces. The difference in space standard between a one storey, three bedspace property (61 sqm) and a one storey, four bedspace property (70 sqm) is nine square metres. The difference between a two storey, three bedspace property (70 sqm) and a two storey, four bedspace property (79 sqm) is also nine square metres.
- a three bed house can be designed to provide four, five or six bedspaces. The difference in space standard between a two storey, four bedspace property (84sqm) and a two storey, six bedspace property (102 sqm) is 18 square metres.
- A four bed home can be designed to provide five, six, seven or eight bedspaces. The difference between a two storey, five bedspace property (97sqm) and a two storey, eight bedspace property (124sqm) is 27 square metres.

Ultimately, it is for the homeowner to decide how they use their space, but it is expected that the differences in floor space would be reflected in the sales price.

Developers would need to clearly identify bedrooms as double/twin or single. The NDSS for a double bedroom is at least 11.5 sqm; officers have found examples of where a

	<p>bedspace was being marketed as a double bedroom but did not meet this standard.</p> <p>Officers have looked at examples of recently adopted Local Plans. Policies generally require all homes to comply with the minimum NDSS standards; some required deviation from the standards to be robustly justified.</p> <p>It is recommended that NWLDC proceeds with seeking to obtain the minimum NDSS standards in all new homes (subject to viability testing).</p>
<p>Sufficiency of evidence base</p> <ul style="list-style-type: none"> • The Council's evidence suggests that the majority of developments exceed the Nationally Described Space Standards. This suggests this policy is not necessary or justified / there is no systemic problem to resolve. • It is clear current evidence does not provide justification for the imposition of the optional NDSS within North West Leicestershire. The Local Housing Needs Assessment and the Leicester and Leicestershire HEDNA prepared in 2017 provide no commentary or evidence in respect of NDSS. • More work is required by the Council to justify its approach on NDSS. 	<p>One agent provided the example of the Harborough Local Plan, where a proposed policy requirement for development to comply with the NDSS was deleted due to the inadequacy of the evidence (Inspector's Report, 8 April 2019, paragraph 49). Officers did some more investigation on what Local Plan Inspectors deem sufficient evidence by looking at Local Plans that have recently gone through the examination process. Officers have decided that our evidence would be strengthened if we expanded upon the snapshot of developments previously relied upon, and have undertaken a more comprehensive survey of approved house types. Whilst this work has not yet been completed, to date it has found that one, two and three bed homes are more likely to be below the minimum NDSS than four or five bed homes, suggesting there <i>is</i> a systemic issue to resolve.</p> <p>The previous snapshot also applied a 10% discount to the gross external area in order to get a figure for the gross internal floor area. Officers decided that the evidence would be strengthened if the internal floorspace was measured off plans.</p>
<p>Transition Period</p> <p>If the Council can justify a NDSS policy:</p> <ul style="list-style-type: none"> • A transition period between adoption and implementation is required to enable 	<p>Aside from the comments that the NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date, there were no</p>

<p>developers to adapt their housing specifications</p> <ul style="list-style-type: none"> • A transition period is needed to account for the fact that the land deals underpinning strategic and non-strategic sites may have been secured prior to any proposed introduction of the NDSS • Sites should be allowed to move through the planning system before any proposed policy requirements are enforced. Prior to a specified date, the NDSS should not be applied to any reserved matters applications or any outline or detailed approval. 	<p>suggestions on what an appropriate transition period might be.</p> <p>The PPG says that 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.”</p> <p>The Doncaster Local Plan was adopted on 23 September 2021. In the Inspector’s report, dated 30 June 2021, the Inspector concluded that (our emphasis):</p> <p><i>“The Council’s intention to introduce the standards was made clear in the consultation on the draft plan in 2018. I am, therefore, satisfied that the requirement in policy 46 part A for all new housing to meet the Nationally Described Space Standard as a minimum is justified by adequate, proportionate and up to date evidence about need, viability and timing.”</i></p> <p>This means that the Inspector concluded that the time period of roughly three years between consultation and the publication of their report was a sufficient transition period.</p> <p>NWLDC first presented a Local Plan Committee report on space standards on 8 September 2021 with the Regulation 18 consultation following in January 2022. A similar timeframe to adoption as Doncaster is likely to apply in North West Leicestershire and as a result, a further transition period in the Local Plan is not recommended.</p>
<p>Density of developments</p> <ul style="list-style-type: none"> • Higher density housing preferred as it means less environmental damage. • Existing developments in the district are overcrowded. • Plot and garden sizes are more important than internal space. • Car parking is just as important. Not enough car parking spaces are being provided and the Council should not allow garage conversions as this results in more on-street parking. 	<p>Whilst related, the density of development is outside of the remit of a minimum space standards policy. Density is a current design consideration of NWLDC and will be addressed in an authority-wide Design Code which is currently being prepared.</p>

<p>Yes, perhaps the standards do Not go far enough in terms of future proofing our houses for technology and electrical requirements.</p>	<p>This comment doesn't appear to relate to space standards.</p>
<p>The NDSS need to be monitored/enforced to ensure they are being applied correctly.</p>	<p>Comments noted. Developers will only have planning permission to build in accordance with the approved plans. The PPG makes clear that:</p> <p><i>"...the space standard has not been incorporated into the Building Regulations. Establishing compliance and any enforcement action therefore rests with the local planning authority."</i> (Paragraph: 021 Reference ID: 56-021-20150327)</p>
<p>The proposed policy should be amended to include a requirement that all applications for new residential developments must be accompanied by information that demonstrates that the proposal complies with the Nationally Described Space Standards, as a minimum. Without the submission of such information, there will be a significant increase in the work that needs to be undertaken by the Council's Development Management team when assessing such proposals to see if they meet the space standards requirement, which in turn will increase the time it takes for the Council to deal with such applications and result in delays in issuing decisions.</p>	<p>The process by officers of checking floorspaces across a wide range of developers/applicants has revealed the inconsistency of information provided on plans. Some provide a total internal floorspace measurements in square metres, whereas some provide it in square feet, some provide the external floor area and provide no information at all (requiring officers to measure off plans). Very few plans provide information on sqm of storage in a particular dwelling.</p> <p>It is agreed that if a policy on NDSS was to be pursued, that the information provided needs to be consistent.</p> <p>The supporting text of the Doncaster Local Plan (adopted September 2021) sets out the following requirements and a similar approach is recommended for NWLDC:</p> <p><i>"To allow the Planning Authority body to check compliance of a development against the Nationally Described Space Standard it would be helpful if planning applications clearly state on all appropriate plans:</i></p> <ul style="list-style-type: none"> • <i>The internal area (m2) and width (m) of every bedroom and the number of intended occupants for each bedroom in each different type of dwelling on the site;</i> • <i>All specific storage spaces and its internal area (m2) in each different type of dwelling on the site; and</i> • <i>The overall gross internal area (m2) of each different type of dwelling on the site."</i>