

# Breckland Local Plan Examination

## **Matter 7:**

## **Other Housing Types and Related Policies**

**(Policies HOU09, HOU10, HOU11, HOU12 and HOU13)**

## **Breckland District Council Hearing Statement**

March 2018



## Policy HOU09

### 7.1: What are the identified needs for housing for older people, particularly residential institutions (Use Class C2)?

1. The NPPF defines older people as:

*'People including the active, newly-retired through to the very frail elderly, whose housing needs can encompass accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs.'*

2. The Central Norfolk Strategic Housing Market Assessment (CNSHMA) (LP/H/1) has considered the housing needs of all people as part of the objectively assessed need (OAN), this incorporates the needs of older people. This approach is in accordance with the Planning Practice Guidance (Paragraph: 021 Reference ID: 2a-021-20160401 and Paragraph: 037 Reference ID: 3-037-20150320). The NPPF's definition of older people recognises a spectrum of people with different needs and recognises the range of housing requirements for older people, including the requirement for C3 dwelling houses.
3. Residential nursing care accommodation (including end of life/ hospice care and dementia care homes) are considered as falling within C2 Use Class providing non self-contained residential accommodation for people requiring additional personal or nursing care. The CNSHMA also specifically looks at those people within C2 communal establishments. The approach taken to assessing this need is in accordance with the CLG methodology<sup>1</sup>. This approach considers the number of people over the age of 75 likely to require an institutional care home. This is shown within Figure 45 on page 46 of the CNSHMA, and establishes a population growth of 3,909 additional bed spaces across the housing market area. An individual figure for Breckland is not provided.
4. The increase in demand for C2 spaces arises from the application of the CLG methodology which assumes a proportional increase in the number of people over 75 needing to reside within a communal establishment. Paragraph 4.32 of the CNSHMA on page 80 considers this rational in further detail, highlighting that it does not necessarily follow that an increase in institutional population necessarily needs to be provided as increased bed spaces.

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<sup>1</sup> Household Projections 2012-based: Methodological Report, Department for Communities and Local Government, February 2015

**7.2: Does the Plan do enough to ensure that the needs of older people are met?**

5. The Planning Practice Guidance (Paragraph: 037 Reference ID: 3-037-20150320) recognises that older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2).
  
6. Having regard to the requirements of the PPG, the Local Plan includes a range of approaches to meeting the need of older people through the plan period, considering that a 'one size fits all' approach is not appropriate. As noted within the PPG appropriately located market housing can form suitable accommodation for older people. Policy HOU02 allocates additional land for residential developments in the District's key settlements, market towns and local service centres, where there is access to services and facilities. In addition to this, the following approaches are included within the Local Plan:
  - Policy HOU 09 Specialist Housing: This policy aims to assist the delivery of specialist older persons housing (Use Class C3) that enables people to live independently in their own homes for as long as possible with appropriate levels of support provided. The policy supports the provision of specialist housing for older people subject to a range of criteria. The policy also seeks to resist the loss in the number of extra care or care premises unless it can be demonstrated that a replacement facility will be provided or that such a use was not viable.
  
  - Policy HOU 10 Technical Design Standards for New Homes: This policy includes requirements for a proportion of dwellings within major schemes to meet building regulation standards M4(2) 'accessible and adaptable dwellings' and M4(3) 'wheelchair user dwellings'. M4(2) standards are met where reasonable provision is made for most people to access the dwelling. This can include ensuring there is step free access to the dwelling, car park space, communal space and WC. In addition, ensuring that the dwelling is capable of being adapted in the future. M4(3) standards occur where a new dwelling makes reasonable provision for a wheelchair user to live in the dwelling and use associated private and outdoor space, parking and communal facilities that may be provided for the use of the

occupants. This policy seeks to provide a choice of suitable housing so as to enable people to live for longer within their own homes.

- Policy HOU 14 Affordable Housing Exceptions: This policy enables specialist housing to come forward outside the higher order settlements, if there is a demonstrated local need which justifies the provision in that area.
- Watton Housing Allocation 2 Land north of Norwich Road, Watton (LP[104]015) includes the requirement for a minimum 60 bed C2 care home within the scheme. Watton, as one of the market towns within the District, represents a sustainable location for a new care home. This policy specifically helps to meet the need for C2 bed spaces identified within the Central Norfolk Strategic Housing Market Assessment (LP/H/1)

7. It is the Council's opinion that taken together, the range of approaches for meeting the needs of older people set out within the Local Plan will meet the needs of older people over the lifetime of the plan.

**7.3: What is considered to be a higher order settlement within criterion b?**

8. Higher order settlements are defined within paragraph 3.70 of the Pre-Submission Publication document (LP/S/1), they include Key Settlements, Market Towns and Local Service Centres as defined within GEN03.
9. The Council would wish to propose a modification to paragraph 3.70. This, in error, refers to Policy GEN02 Promoting High Quality Design rather than Policy GEN03 Settlement Hierarchy.

**Policy HOU10**

**7.4: Are the Technical Design Standards for New Homes set out within Policy HOU10 justified and consistent with national policy?**

10. The Written Ministerial Statement of March 2015<sup>2</sup> set out information regarding a new national space standard. This set out that local authorities have the option to set additional requirements exceeding the mandatory minimum standards required by Building Regulations in regard to access and water efficiency and a Nationally Described Space Standard (NDSS)<sup>3</sup>.
  
11. National Planning Practice Guidance, with regard to Housing Optional Technical Standards states that: *“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 standard in their area and justify setting appropriate policies in their Local Plans”*.
  
12. Paragraph 158 of the National Planning Policy Framework (NPPF) requires local planning authorities to ensure that *“the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area”*. Paragraph 174 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 of the plan, when added to nationally required standards... evidence supporting the assessment should be proportionally, using only appropriate available evidence”*.
  
13. Policy HOU 10 has been formed within the parameters of national policy and based on evidence to support the policy. The Optional Technical Standards document forms Appendix 1 of this matter statement and provides further detail to the sections of Policy HOU 10, as set out below, to illustrate that the policy is justified and consistent with national policy.

## **Water Efficiency**

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<sup>2</sup> Planning Update: Written statement - HCWS488 (2015) [Online]  
<http://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2015-03-25/HCWS488/> [Accessed 28/02/2018]

<sup>3</sup>

14. The Preferred Directions consultation (LP/S/8) included the policy, COM 06 'Technical Design Standards for New Homes'. At this stage no provision was included in regards to water efficiency.
15. National Planning Practice Guidance sets out that the following can be considered primary sources of evidence: The Environment Agency Water Stressed Areas Classification (2013); Water resource management plans produced by water companies; River Basin Management Plans; and locally specific evidence, for example 'water cycle studies'<sup>4</sup>.
16. The evidence base for the section on water efficiency within the Optional Technical Standards topic paper looks at the Environment Agency Water Stressed Areas Classification (2013) and Anglian Water's Water Resources Management Plan (WRMP) and the Water Cycle Study (LP/E/5).
17. The Water Cycle Study Update 2017 (LP/E/5), which looks at the proposed growth outlined in the District through the emerging local plan, identifies the key constraints in regard to water availability and efficiency. In relation to water availability the study highlights the findings in the WRMP, confirmed with Anglian Water, that the level of growth assessed within the Water Cycle Study update is factored into the current WRMP which has been approved by the Environment Agency and DEFRA. The study concludes that there is sufficient water supply to meet planned demand without impacting adversely on the environment. With regards to water efficiency the study considers the feasibility of attaining a 'water neutral' position in the District. Whilst the study concludes that this aspiration is unlikely to be a feasible option for the District the study provides a 'pathway'. The study recommends that new development be built to the optional Building Regulations for water efficiency. The policy recommendation sets out that new housing development should be built at a standard of 110 l/h/d and that non-domestic buildings should, as a minimum, reach 'good' BREEAM status.
18. As a result of the findings of the Water Cycle Study the requirement was added to the policy to set out that all new housing must meet Building Regulation requirement of 110 litres per head per day, and that non-domestic buildings should as a minimum reach 'Good' BREEAM status. This was supported by Anglian Water through the pre-submission publication and can be found on page 1235 of the Breckland Local Plan Pre-

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<sup>4</sup> Paragraph: 016 Reference ID: 56-016-20150327 (2015) Planning Practice Guidance [Online] <https://www.gov.uk/guidance/housing-optional-technical-standards> [Accessed 26/02/2018]

Submission Publication Full Representation Schedule (LP/S/25). This approach is considered to be justified and consistent with national policy.

### **Internal Space in a Home**

19. The Preferred Directions consultation (LP/S/8) included the policy, COM 06 'Technical Design Standards for New Homes'. At this point it was set out that 'all new homes, both market and affordable, will meet the Government's Nationally Described Space Standards (NDSS)'. Consultation responses received during this consultation highlighted broad agreement for the policy direction.
20. Paragraph 17 of the NPPF sets out a list of core planning principles, one of these principles is that "*planning should always seek to secure high quality design and a good standard of amenity for all existing and guide occupants of land and buildings*". National Planning Practice Guidance<sup>5</sup> sets out that local planning authorities should provide justification for requiring internal space policies, taking account of 'need', 'viability' and 'timing'.
21. The Optional Technical Standards topic paper (LP/V/X) looked at 382 dwellings through 10 planning permissions between 2014-15 and 2016-17 to analyse the size of homes being completed in Breckland. This found that of the 382 homes surveyed 85.1% of dwellings are currently meeting or exceeding the Government's NDSS.
22. Questions around viability are addressed in the response to question 7.5. In regards to timing it is considered that as the policy has been through Preferred Directions consultation process (LP/S/8) and again through the Pre-Submission consultation (LP/S/1), alongside the fact that the majority of development is already being built to NDSS, the policy would not require a transitional period following the adoption of the Local Plan.
23. The proposed policy in relation to internal space is therefore justified and consistent with national policy.

### **Accessibility of Homes**

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<sup>5</sup> Planning Practice Guidance (2015) Paragraph: 020 Reference ID: 56-020-20150327 [Online] <https://www.gov.uk/guidance/housing-optional-technical-standards> [Accessed 27/02/2018]

24. The Preferred Directions consultation (LP/S/8) included the policy, COM 06 'Technical Design Standards for New Homes'. The policy set out that a minimum of 5% of market homes are to meet building regulation M4 (2) 'accessible and adaptable dwellings', unless viability considerations dictate otherwise. In regards to affordable homes 5% are to be M4 (2) and a minimum of 1% are to be M4 (3) 'wheelchair user dwellings'. Responses to the consultation were mostly supportive, with developers raising concerns regarding the percentage figures and, in their opinion, the restrictive nature of the policy.

25. National Planning Practice Guidance<sup>6</sup>, states that information should be taken into account regarding: The likely future need for housing for older and disable people; size, location, type and quality of dwellings needed to meet specifically evidence needs; the accessibility and adaptability of existing housing stock; and how needs vary across different housing tenures.

26. The Optional Technical Standards topic paper analyses a wide range of data and concludes that:

- The population of Breckland is ageing and over the next 20 years the percentage of the population within the age bracket '65+' is expected to increase by approximately 66%;
- 20% of people within Breckland are suffering from a disability that limits day-to-day activities and approximately 12% of the population 18-64 suffer from a moderate or serious physical disability;
- as of July 2017, Breckland has 8,366 households in affordable housing of which 26% have a long term illness or disability and of these 8.4% have a disability defined as 'at least moderate';
- as of July 2017, there were 3,398 total households on Breckland's waiting list. 1,870 of those were under the criteria 'people who need to move on medical or welfare grounds, including grounds relating to a disability'; and
- furthermore, there is evidence to show that there are currently very few dwellings in the country that are fully 'viable'.

27. As a result of this evidence the policy requirement was increased to include a minimum of 20% of all new major market housing developments to meet building regulations

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<sup>6</sup> National Planning Practice Guidance (2015) 007 Reference ID: 56-007-20150327 [Online] <https://www.gov.uk/guidance/housing-optional-technical-standards> [Accessed 27/02/2018]



M4(2), and a minimum of 20% of all new affordable housing should be M4(2) and a minimum of 5% of all new affordable housing should be M4(3).

28. It is considered that the evidence set out in the Optional Technical Standards topic paper illustrates that Policy HOU 10 is justified and consistent with national policy.

**7.5: Is Policy HOU 10 supported by a robust assessment of viability that includes all Plan policy costs?**

29. HDH Planning & Development Ltd, the consultants undertaking the Plan Wide Viability Assessment (LP/V/2), were provided with the Preferred Directions (LP/S/8) version of the policies. The study looks at the cumulative impact of all policies within the plan, including Policy HOU 10. Due to the stages of the Local Plan process changes have been made to the policy following this, these are detailed below and supported by the Optional Technical Standards topic paper.

**Internal Space in a Home**

30. In regards to internal space standards the quantum did not change from the Preferred Directions stage of the plan to the proposed Policy HOU 10. Paragraph 8.15 of the Plan Wide Viability Study (LP/V/2) states that the modelling is in line with the Nationally Described Space Standard Requirements.

31. The Optional Standards Topic Paper (Appendix 1) reviews the evidence for recently permitted development in Breckland District demonstrates that 85.1% of development is currently meeting or exceeding the Nationally Described Space Standards (NDSS). Therefore, overall it can be concluded that if most developers are already building to the NDSS standards without a set requirement to do so, the impact on viability is not significant.

32. The policy wording also states that the 'following standards will apply subject to viability'. This seeks to provide flexibility within the policy and further demonstrate the viability of the policy.

**Water Efficiency**

33. The Preferred Directions version of the policy (LP/S/8) did not include a requirement for this and therefore it has not been assessed through the Plan Wide Viability Assessment. However, the Department for Communities and Local Government Housing Standards Review, September 2014, setting a local water efficiency standard could add to the development cost by £0-£9 per dwelling<sup>7</sup>. The report highlights that these costs are expected to reduce over time as manufacturers replace ranges to include water efficiency measures as standard units, as opposed to separate water saving devices. This was supported by Anglian Water through the pre-submission publication and can be found on page 1235 of the Breckland Local Plan Pre-Submission Publication Full Representation Schedule (LP/S/25).
34. Given that the cost of water efficiency measures is low and expected to decline, it is not considered that this would be an onerous requirement for developers and therefore would not render any development unviable.
35. The policy wording also states that the 'following standards will apply subject to viability'. This seeks to provide flexibility within the policy and further demonstrate the viability of the policy.

### **Accessibility of Homes**

36. The Preferred Directions version of the policy (LP/S/8) set out that: at least 5% of market dwellings and affordable dwellings should be built to M4(2) Building Regulations standards and at least 1% of affordable dwellings should be built to regulation M4(3). This quantum was assessed through the Plan Wide Viability study (LP/V/2).
37. The Department for Communities and Local Government's paper on the cost impacts of the Housing Standards Review set out that implementing M4(2) dwellings would cost approximately £520 to £940 per dwelling. The cost of building to M4(3) standard would be £7,764 to £23,052.
38. The Optional Technical Standards topic paper states that, in the absence of a national standard, it is considered necessary in order to ensure the provision of a supply of accessible and adaptable homes in the District to meet the need requirements of current and future residents. The study recommended that the number of M4(2) dwellings is

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<sup>7</sup>Department for Communities & Local Government (2014) Housing Standards Review: Cost Impacts [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/353387/021c\\_Cost\\_Report\\_11th\\_Sept\\_2014\\_FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/353387/021c_Cost_Report_11th_Sept_2014_FINAL.pdf)

limited to reflect local market conditions and generally lower land values, (comparative to south east England), as highlighted in the Breckland Viability Study. Furthermore, any requirement for M4(3) standard dwellings should be modest, as these are expensive to build and have a more limited market appeal. The study concludes by states that *“to ensure that targets set for these types of dwellings do not render development unviable, it is recommended that any policy includes a clause to ensure that the standards apply, subject to viability”*.

39. The policy wording also states that the ‘following standards will apply subject to viability’. This seeks to provide flexibility within the policy and further demonstrate the viability of the policy.
40. Policy HOU 10 is supported by a robust assessment of viability, the Plan Wide Viability Study (LP/V/2), which includes plan policy costs at the Preferred Directions stages. The Optional Technical Standards topic paper sets out additional costs and limits

**7.6: What is the status of the ‘Optional Technical Standards Topic Paper’ that has been referred to by the Council? Does this or should it form part of the examination evidence?**

41. The evidence contained within the Optional Technical Standards topic paper was used to formulate Policy HOU 10. However, the topic paper itself was still being collated during the submission of the Local Plan. This document has now been completed and forms Appendix 1 of this statement.

**Policy HOU11**

**7.7 Is Policy HOU 11 consistent with national policy and justified, in terms of its approach to replacement dwellings?**

42. The Council considers Policy HOU11 in relation to replacement dwellings to be both consistent with national policy and justified in terms of the policy approach taken to replacement dwellings. The three dimensions to sustainable development (social, economic and environmental) and the presumption in favour of sustainable development site at the heart of the NPPF. The principle for new housing is considered under Policy HOU06, whilst the supporting text to Policy HOU11 at paragraph 3.98 sets out that Policy HOU11 applies to rural areas, where new dwellings would not necessarily be in accordance with Policy HOU06.

43. The NPPF does not set out specifications for replacement dwellings with the exception of within Green Belts. However, it is considered appropriate to address the requirements of replacement dwellings in rural areas for buildings where a legal C3 planning use exists. Policy HOU11 requires that replacement dwellings must be of a scale and design sensitive to the countryside setting and of a size similar to that of the original dwelling. The Central Norfolk Strategic Housing Market Assessment (CNSHMA) (LP/H/1) requires a range of housing sizes within Breckland. The policy aims to allow moderate change to properties in rural locations whilst also retaining an appropriate range and mix in terms of size so as to avoid an oversupply of large properties which would result in limited choice of house types in rural areas.
44. No soundness representations were received in relation to the policy wording at regulation 19 publication stage and representations received at the regulation 18 Preferred Directions (LP/S/8) were predominantly in agreement with the wording of the policy.

**7.8: Is the criterion in relation to not being abandoned justified? Under what circumstances would this be relevant?**

45. The Council consider the use of abandonment in relation to Policy HOU11 to be justified. Abandonment is a legal concept which sets out the circumstances in which rights to resume a use which has lawfully been carried out in the past may be lost because of the cessation of that use. Case law *Trustees of Castell-y-Mynach Estate v SoS 10/7/84* has established the criteria to be considered when determining whether the residential use of an existing building has been abandoned. As set out in the response to issue 7.7, Policy HOU11 seeks to apply to the replacement, extension and alteration of dwellings in the countryside, in order to ensure that proposals do not adversely impact the character of the countryside.
46. Where a use has been abandoned, it can be considered to have ceased, and therefore cannot be replaced. Therefore, any application would need to be assessed as a new C3 dwelling. In this regard paragraph 55 of the NPPF is of relevance, where it states that *'Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances.'*

**7.9: Is the last sentence of Policy HOU 11, which refers to the settings of listed buildings consistent with national policy?**

47. Having regard to Section 12 of the NPPF, and in particular paragraphs 133 and 134, the Council accepts that this sentence goes beyond the requirements of the NPPF. The Council consider that the sentence should be altered and proposes the following modification: *'Extensions or alteration that would cause substantial harm to a designate heritage asset or its setting should be refused.'*

**Policy HOU12**

**7.10: Is the approach of Policy HOU 12 justified and consistent with national policy?**

48. Policy HOU12 deals with the conversion of buildings in the countryside. It is the Council's opinion that the policy is justified and consistent with national policy in relation to the conversion of buildings as set out in the NPPF and The Town and Country Planning (General Permitted Development) (England) Order 2015.

49. The NPPF states (paragraph 55) that local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances, this can include the re-use of redundant or disused buildings. Policy HOU12 supports the conversion of existing buildings in the countryside subject to criteria. This is considered to be in accordance with the requirements of the NPPF.

50. It is acknowledged that Part Q of the GPDO allows the change of use of agricultural buildings. The requirements of Policy HOU12 would not apply to development which would be permitted under Part Q.

**Policy HOU13**

**7.11: Should the title of the policy refer to rural workers to be consistent with national policy?**

51. The first paragraph of Policy HOU13 refers to permanent dwellings for full-time workers in agriculture, horticulture, forestry and other rural activities. This is also set out in the

supporting text to the Policy. The policy and supporting text is considered to be clear in referring to rural workers and therefore consistent with the NPPF (paragraph 55). Whilst the title of the policy referring to agricultural workers exceptions is not considered to be inconsistent with the NPPF, the Council is not averse to changing the title of the policy to closer reflect NPPF paragraph 55.

**7.12: Is the last bullet point of Policy HOU 13 justified?**

52. The final bullet point of Policy HOU 13 relates to dwellings being made available to registered providers for a rural worker prior to the occupancy condition being removed. Dwellings permitted for rural workers in accordance with the policy and paragraph 55 of the NPPF are permitted in areas where new private market dwellings would not normally be permitted. There is a significant need for affordable housing within Breckland, as demonstrated in the Central Norfolk Strategic Housing Market Assessment (LP/H/1). The inclusion of the last bullet point is therefore considered relevant, appropriate and necessary in order to assist in addressing this need.
53. The approach does not exclude an open market re-sale of the property however seeks to ensure appropriate steps have been taken for its use to remain for rural workers. The approach is considered to be justified in accordance with paragraphs 55 and 182 of the NPPF.



# Breckland Local Plan: Optional Technical Standards

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July 2017

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## Introduction

- I. On 25 March 2015 the Government set out, in a [Written Ministerial Statement<sup>1</sup>](#), information regarding a new national space standard. Local authorities have the option to set additional technical requirements exceeding the mandatory minimum standards required by Building Regulations in regard to access and water efficiency and a Nationally Described Space Standard (NDSS).
- II. The Written Ministerial Statement sets out that the optional new national technical standards should only be required through new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance.
- III. Significant work has been undertaken to prepare and support the emerging Local Plan for the District, including extensive consultation with stakeholders. This Housing Topic Paper sets out the evidence that has been considered in deciding whether to implement the optional standards through the emerging Local Plan.

### 1. Policy Context

- 1.1. The Government introduced amendments to the Building Act 1984 to enable the Building Regulations to set 'optional requirements' above the basic minimum set out in the Building Regulations 2010 in relation to access and water. The Government has also introduced an optional national standard for space, known as the Nationally Described Space Standard (NDSS); this is not part of the Building Regulations.
- 1.2. All optional requirements must be applied through planning policy by way of a condition attached to planning consents. However, the optional standards for water efficiency and access are enforceable through Building Regulations and the space standards enforced through the planning process.
- 1.3. In assessing the need for the optional housing technical standards, local authorities must be able to satisfy the statutory requirements of the NPPF (2012). This requires local planning authorities to ensure that *"the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area"* (para 158).
- 1.4. The NPPF 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).
- 1.5. The National Planning Practice Guidance with regard to Housing Optional Technical Standards states that: *"Local planning authorities have the option to set additional technical*

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<sup>1</sup> Planning Update: Written statement - HCWS488 <http://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2015-03-25/HCWS488/>

*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.” Also that “Local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment.”* The implication being that any additional costs of incurred operating these optional standards together with other Local Plan requirements must not be so great that it would make future development financially unviable.

## **2. Local Policy Context**

- 2.1. The Breckland Core Strategy adopted in December 2009, the statutory development plan for the District, does not have a specific policy regarding water efficiency or internal standards for dwellings.
- 2.2. The Preferred Directions Consultation, carried out in January-February 2016, consulted on the emerging policy ‘Preferred Policy Direction – COM 06 Technical Design Standards for New Homes’. This draft policy outlined that all new development would be in line with NDSS and that 5% of all new market homes and affordable homes should meet building regulations M4(2) and a further 1% of affordable homes should meet building regulations M4(3). The need to produce this supporting optional housing standards topic paper was also identified.
- 2.3. The consultation responses received were generally favourable with most agreeing to the approach and waiting for the optional technical standards topic paper in order to make an informed judgement on the level of accessible and adaptable housing required. There were also a few comments from developers highlighting that this policy would be too restrictive.
- 2.4. Following the Preferred Directions consultation further wording was added to the policy in relation to viability responding to concerns raised by the development industry. The draft plan was subject to a plan wide viability study.

## **3. Methodology**

- 3.1. The starting point for this evidence base document is the Government’s online Planning Practice Guidance. This requires that Local Planning Authorities gather evidence to determine whether there is a need for additional standards in their area, justify setting appropriate policies in this Local Plans and consider the impact of using these standards as part of their Local Plan viability assessment. Sections 4, 5 and 6 of this document consider each of the optional standards in turn and set out the evidence that has been used to inform the conclusions for each standard.

## 4. Water Efficiency

### Why is water efficiency important?

- 4.1. It's easy to take water for granted but being efficient in water use can bring benefits:
- It saves money – cutting water use automatically reduces water charges if you have a meter;
  - there will be less waste water going down the drains, reducing the risk of flooding and reducing the cost of treating the water;
  - it reduces a household's carbon footprint – contributing to carbon reduction targets;
  - it preserves natural resources helps tackle climate change; and
  - around half of all water used is hot water and therefore using less water will also deliver lower energy bills.

### What is the optional standard for water efficiency?

- 4.2. Part G of the Building Regulations includes requirements for water efficiency in residential properties. The baseline requirement is a maximum water consumption rate of 125 litres per person per day. The new optional housing technical standard for water efficiency is 110 litres per person per day, set out in the Building Regulations. This figure includes 5 litres per person per day allowance for external water use. The higher standard would be met through either a fittings-based approach, which imposes 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.
- 4.3. The Code for Sustainable Homes introduced a lower standard of 105 litres per person per day for Levels 3 and 4 of the Code. However, as part of the Housing Standards Review the Government withdrew the Code for Sustainable Homes, stating that necessary standards would, as far as possible, be consolidated into Building Regulations. In addition, in July 2015 the Government stated in its productivity plan: 'Fixing the foundations: Creating a more prosperous nation' that it did not intend to proceed with the zero carbon Allowable Solutions carbon offsetting scheme, or the proposed 2016 increase in on-site energy efficiency standards.

### What does Breckland Council currently have in place locally regarding water efficiency standards?

- 4.4. There is currently no local requirement for water efficiency standards in Breckland in addition to what is required through Building Regulations.

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

- 4.5. According to National Planning Practice Guidance, primary sources of evidence which might support a tighter water efficiency standard for new dwellings are:
- The Environment Agency Water Stressed Areas Classification (2013) which 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 – which describe the river basin district and the pressure that the water environment faces; these include information on where water resources are contributing to a water body being classified as ‘at risk’ or ‘probably at risk’ of failing to achieve good ecological status, due to low flows or reduced water availability;
  - In addition to these primary data sources, locally specific evidence may also be available, for example collaborative ‘water cycle studies’ may have been carried out in areas of high growth.

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

- 4.6. 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. There are 3 categories of water stress – serious, moderate and low.
- 4.7. Breckland sits within the area covered by the Anglian Water Company. Table 1 on page 7 of the report identifies that the area covered by Anglian Water has been classified as an area of serious water stress. Further information on page 8, Figure 2 shows that Breckland is situated within an area of low water stress with only pockets of moderate water stress.
- 4.8. Water companies have a statutory duty to prepare and maintain a Water Resources Management Plan (WRMP). Anglian Water’s WRMP 2015 sets out the intention to maintain the balance between supply and demand over the period 2015 to 2040. Breckland sits within the area known as Norfolk Rural and the WRMP sets out that there are no deficits forecast, no significant climate change or levels of services sensitivities have been identified and that the worst case sustainability reduction is approximately 3Ml/d. A twin track approach is proposed whereby existing demand is managed and new supply sources are provided. Demand would be managed through a reduction of leakage within the supply network and through reductions in consumption via water efficiency measures.
- 4.9. The Water Cycle Study Update 2017, which looks at the proposed growth outlined for the District through the emerging Local Plan, identifies the key constraints in regard to water availability and efficiency.
- 4.10. In relation to water availability the study highlights the findings in the WRMP, confirmed with Anglian Water, that the level of growth assessed within the WCS update is factored into the current Water Resources Management Plan which has been approved by

the Environment Agency and DEFRA. The study concludes that there is sufficient water supply to meet planned demand without impacting adversely on the environment.

- 4.11. With regards to water efficiency the study considers the feasibility of attaining a 'water neutral' position in the District. Whilst the study concludes that this aspiration is unlikely to be a feasible option for the District the study provides a 'pathway'. The study recommends that new development be built to the optional Building Regulations for water efficiency. The policy recommendation sets out that new housing development should be built at a standard of 110 l/h/d and that non-domestic buildings should, as a minimum, reach 'good' BREEAM status.

### **Does the evidence support a need for the optional water efficiency standard?**

- 4.12. A review of relevant evidence shows that promoting water efficiency provides significant benefits to individuals and society. It is a key priority for Anglian Water and initiatives that promote greater water efficiency should be encouraged. The Water Cycle Study recommends that the optional housing standard be adopted through policy in the emerging Local Plan.

### **If this standard is to be considered, what is the impact on viability?**

- 4.13. According to the Department for Communities and Local Government Housing Standards Review, September 2014, setting a local water efficiency standard could add to the development cost by £0-£9 per dwelling<sup>2</sup>. The report highlights that these costs are expected to reduce over time as manufacturers replace ranges to include water efficiency measures as standard units, as opposed to separate water saving devices. Given that the cost of water efficiency measures is low and expected to decline, it is not considered that this would be an onerous requirement for developers and therefore would not render any development unviable. The severity of the water stress in Breckland and the limited financial implications upon developers would justify the implementation of a policy imposing a local water efficiency standard within the Local Plan.

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<sup>2</sup>Department for Communities & Local Government (2014) Housing Standards Review: Cost Impacts  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/353387/021c\\_Cost\\_Report\\_11th\\_Sept\\_2014\\_FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/353387/021c_Cost_Report_11th_Sept_2014_FINAL.pdf)

## 5. Accessibility

### Why is accessibility important?

- 5.1. More than one in ten British adults have mobility problems, such as being unable to move, walk or stand independently<sup>3</sup> yet only around 5% of homes in the UK are designed to be accessible<sup>4</sup>. Most people with mobility problems need some adaptations to their home to allow them to live independently, safely and with dignity. These could range from minor adaptations such as fitting a grab rail on the staircase to major adaptations such as providing a downstairs shower and toilet or a stair lift.
- 5.2. Not only is accessible housing beneficial from a health and wellbeing perspective but it saves on public spending. The Lifetime Homes Standard (which has been replaced by the new M4 (2) access standard) sets out sixteen design criteria intended to make homes more easily adaptable for lifetime use at minimal cost. On average, it costs between £1,082 and £1,100 to build to the Lifetime Homes standard<sup>5</sup>. However, one trip to hospital for someone who slips on the stairs as a consequence of not having a stair-lift installed, costs an average of almost £1,800<sup>6</sup> - 60% more than installing Lifetime Homes features in a new home and treating a hip fracture costs over £28,000<sup>7</sup>.

### What are the optional standards for accessibility?

- 5.3. Part M Volume 1 of the Building Regulations deals with access to and use of dwellings. It has three parts:
  - M4(1) Visitable dwellings (mandatory);
  - M4(2) Accessible and adaptable dwellings (optional);
  - M4(3) Wheelchair user dwellings (optional), which includes:
    - Wheelchair adaptable
    - Wheelchair accessible.
- 5.4. Given that M4(1) is mandatory, it is dealt with via Building Regulations. Only M4(2) and M4(3) are relevant for consideration within this Report.
- 5.5. In relation to M4(3) wheelchair user dwellings the Building Regulations set a distinction between wheelchair adaptable - M4(3)(2)(a) and wheelchair accessible dwellings – M4(3)(2)(b). M4(3)(2) states that the provision made must be sufficient to:
  - (a) allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs; or
  - (b) meet the needs of occupants who use wheelchairs.

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<sup>3</sup> Leonard Cheshire Disability (2014) The Hidden Housing Crisis

<https://www.leonardcheshire.org/sites/default/files/Hidden%20Housing%20Crisis%20July%202014.pdf>

<sup>4</sup> Department for Communities & Local Government (DCLG) (2014) English Housing Survey Households 2012 to 2013

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/335751/EHS\\_Households\\_Report\\_2012-13.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/335751/EHS_Households_Report_2012-13.pdf)

<sup>5</sup> Department for Communities & Local Government (2014) Housing Standards Review: Cost Impacts

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/353387/021c\\_Cost\\_Report\\_11th\\_Sept\\_2014\\_FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/353387/021c_Cost_Report_11th_Sept_2014_FINAL.pdf)

<sup>6</sup> Leonard Cheshire Disability (2014) The Hidden Housing Crisis

<https://www.leonardcheshire.org/sites/default/files/Hidden%20Housing%20Crisis%20July%202014.pdf>

<sup>7</sup> Office for Disability Issues (2007) Better outcomes, lower costs: Implications for health and social care budgets of investment in housing adaptations, improvements and equipment: a review of the evidence <http://socialwelfare.bl.uk/subject-areas/services-client-groups/adults-disabilities/officefordisabilityissues/better107.aspx>

- 5.6. These two different housing standards provide for distinct household types; homes that are built to M4(3)(2)(b) enable a greater degree of independence for people with more complex or distinct needs, e.g. people who use wheelchairs.
- 5.7. National Planning Practice Guidance states that Local Plan policies for wheelchair accessible homes (i.e. those that are ready for use by people in a wheelchair) should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling, namely social housing.
- 5.8. 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;
  - e) Wall-mounted switches, socket outlets and other controls are reasonably accessible to people who have reduced reach.
- 5.9. 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.
- 5.10. Local Plan policies 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.
- 5.12. Finally, where there is a very specific and clearly evidenced accessibility need, which is outside of what is provided for by the wheelchair accessible standard, a local planning authority can have different requirements in order to meet that need. This should only be required to meet the needs of a specific individual and therefore should only be required of a home where a local authority allocation policy applies, i.e. social housing. Such a requirement would also be subject to viability considerations.

### **What does Breckland Council currently have in place locally regarding accessibility standards?**

- 5.13. The Council currently has no standards regarding accessibility of dwellings.

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

- 5.14. The National 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 Breckland?**

#### **The ageing population**

- 5.15. Norfolk's ageing population is well documented. The 2012 based population projections by ONS suggest that the population of Norfolk is expected to increase by 7% over the next decade. Whilst this is below the national projected increase at 7.2% the proportion of the increase expected to come from 65 plus age groups is significant. Norfolk's oldest age groups are projected to grow the quickest in the next decade – with the 75-84 year olds projected to increase by 32.9% and the 85 and overs projected to increase by 39.7%.

- 5.16. Government policy in relation to older people is focused on ensuring that older people can live independently at home. New strategies within the social care setting underpinned by the Care Act 2014, looks to move further towards independent living with an emphasis on people remaining in their own homes for as long as possible. Housing is fundamental in ensuring that this is achieved. Homes that are accessible, adaptable and flexible to accommodate changing needs across the life course are critical to ensuring that the health and wellbeing of older people and those living with disabilities is improved and needs prevented. Improving the space and accessibility of new homes delivered across a mix of tenures will provide greater flexibility and longevity to assist in ensuring a range of needs are met.
- 5.17. As part of the Central Norfolk Strategic Housing Market Assessment 2017, Opinion Research Services (ORS) prepared population forecasts for Breckland based on the 2014 Sub National Population Projections (SNPP). These show that, based on the District's proposed growth scenario, the population is projected to increase from 130,500 in 2011 to 153,678 in 2036 an increase in population of 15% over the plan period.
- 5.18. Of particular interest is the projected increase in the older age groups. In 2012, there were 29,722 residents ages 65 or older. By 2036 this is expected to be 49,012, an increase of 19,563 (65%) as highlighted in Table 1.

**Table 1: population change among residents over the age of 65 (CNSHMA, 2017)**

Age Group	2012	2036	% change
65-69	9,145	11,091	+21%
70-74	6,764	11,087	+64%
75-79	5,629	9,033	+60%
80-84	4,159	7,150	+72%
85+	4,025	10,651	+165%
<b>Total 65+</b>	<b>29,722</b>	<b>49,012</b>	<b>+65%</b>

- 5.19. Table 1 above indicates that the percentage change in all age categories over 65 is expected to increase over the plan period. The population within the age bracket 80-84 is expected to rise by 72% while the population of those residents over 85 is expected to rise by 165%. This clearly shows that the number of elderly people within Breckland is increasing significantly. This will bring challenges in meeting the future housing needs of this group of people in ensuring they can live independently in their homes for as long as possible.
- 5.20. Whilst the emerging Breckland Local Plan proposes a more dispersed approach to development over the plan period it is expected that the number of people in older age groups will continue to increase over the plan period. The number of households with a member aged over 65 is also therefore likely to increase.
- 5.21. The 2011 census provided further information regarding tenure for the over 65 population within the District, as illustrated in Figure 1. This shows that the majority of households where the reference person is over the age of 65 are owned (78.1%) outright. Whilst most owners without a mortgage are often retired and their annual gross household income is often less than those of a typically younger age, their overall financial capacity ie amount available to move home is much greater than any other group. It is noteworthy that many older people will look to have their needs met by the market.

5.22. Whilst the majority own their own properties, 13.7% of the population are within social rented accommodation, and, therefore, policies for accessible housing should reflect both tenures.

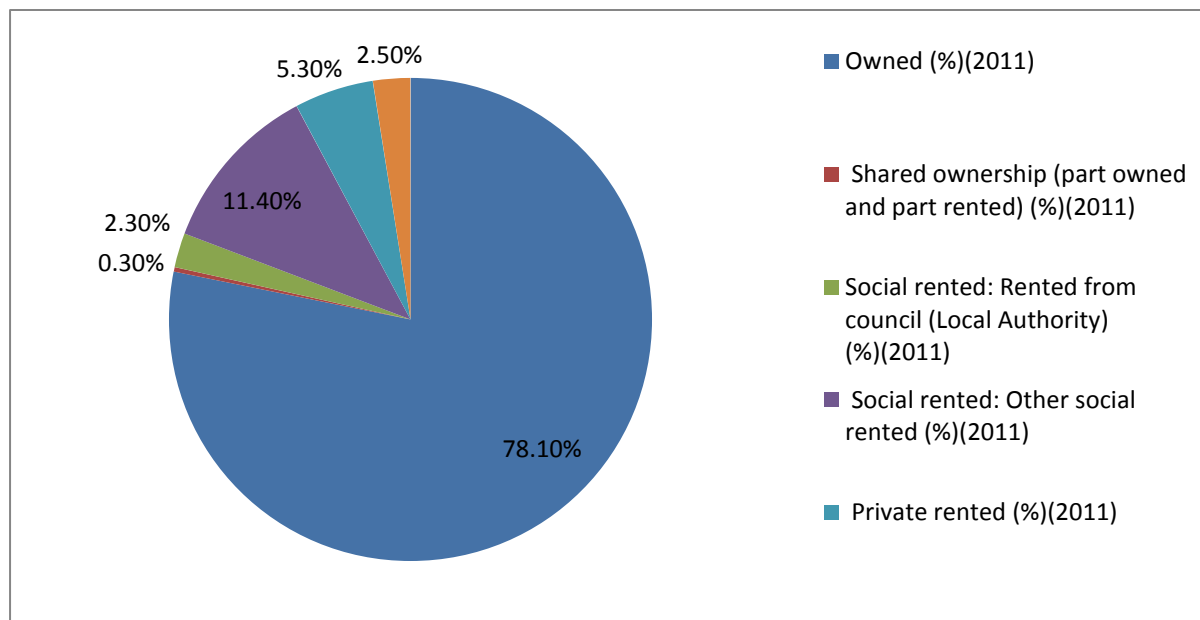


Figure 1: Tenure (Household Reference Person aged 65 and over) (2011 Census)

5.23. The Norfolk Older People’s Strategy<sup>8</sup> sets out objectives specifically on ‘Being well-houses and feeling safe’. Citing that in 2001 nearly one third of all households (29%) in Norfolk were pensioner-only households, the objectives seek to provide for this demographic. One of the key objectives, objective 1.3.4, is to development Home Improvement Agency (HIA) services across the county to assist with repairs and adaptations in the home.

## Falls

5.24. Falls are one of the most common reasons disabled and older people are admitted to hospital, but they could be dramatically reduced by ensuring homes are suitable for features such as stair lifts, grab rails and level access to buildings<sup>9</sup>. In Norfolk in 2011/12 there were 3,644 people aged over 65 admitted to hospital with injuries due to falls and 200 of these suffered a broken hip. Hip fractures can have long-term consequences for a person’s independence, and 1 in 3 ends up leaving their own home and moving into a long-term care setting. In addition to the personal cost to an individual who suffers a fall, falls have a significant cost to health and social care services. This includes ambulance call-outs to pick up people who have fallen, A&E attendances, in-patient treatments for fractures and other trauma, rehabilitation and long term follow-up care and support.

<sup>8</sup> Living Longer, Living Well: The Norfolk Older People’s Strategy (2009) <https://www.ageuk.org.uk/brandpartnerglobal/norfolkvpp/documents/livinglongerlivingwellnextsteps2009-2011june2009.pdf>

<sup>9</sup> Leonard Cheshire Disability (2014) No Place Like Home <https://www.leonardcheshire.org/sites/default/files/no-place-like-home-leonard-cheshire-disability.pdf>

## People living with illness and disability

- 5.25. According to the 2011 census, approximately 20% of Breckland's residents consider themselves to have a long term health problem or disability, higher than the England average of 17%.

**Table 2: Extent to which day to day activities are limited (Census, 2011)**

	<b>Breckland</b>	<b>%</b>	<b>England</b>	<b>%</b>
All Usual Residents	130,491		53,012,456	
Day-to-Day Activities Limited a Lot	11,537	9	4,405,394	8
Day-to-Day Activities Limited a Little	14,108	11	4,947,192	9
Day-to-Day Activities Not Limited	104,846	80	43,659,870	82

- 5.26. Research undertaken by the English Housing Survey<sup>10</sup> found that, nationally almost 30% of households have a reference person with a long term illness or disability. Almost half of these (49%) live in social rented housing, around 27% are owner occupiers and around 22% live in private rented housing. Households that have one or more wheelchair users account for 3.3% of all households, although the tenure of these households is not recorded.
- 5.27. In 2012 within Breckland there were 8,137<sup>11</sup> people aged 18-64 who suffer from a moderate or serious physical disability, approximately 12% of the population in this age category. Table 3 indicates that this was expected to rise to 8,556 by 2020.

**Table 3: People aged 18-64 in Breckland with a physical or mental disability<sup>12</sup>**

	<b>2012</b>	<b>2014</b>	<b>2016</b>	<b>2018</b>	<b>2020</b>
<b>Total population aged 18-64 projected to have a learning disability</b>	1,842	1,854	1,863	1,880	1,892
<b>Total population aged 18-64 projected to have a moderate or serious physical disability</b>	8,137	8,124	8,238	8,402	8,556
<b>People aged 18-64 projected to have a common mental disorder</b>	12,274	12,286	12,363	12,472	12,561
<b>People aged 18-64 projected to have a borderline personality disorder</b>	343	343	345	348	351
<b>People aged 18-64 projected to have an antisocial personality disorder</b>	268	268	270	273	276
<b>People aged 18-64 projected to have a psychotic disorder</b>	305	305	307	310	312

<sup>10</sup> Department for Communities & Local Government (2014) English Housing Survey 2011 to 2012 <https://www.gov.uk/government/statistics/english-housing-survey-2012-to-2013-headline-report>

<sup>11</sup> PANSI, 2012

<sup>12</sup> PANSI, 2012

<b>People aged 18-64 predicted to have two or more psychiatric disorders</b>	5,493	5,500	5,535	5,585	5,628
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## Wheelchair user housing

- 5.28. As stated earlier, policies for homes that can be used by people in a wheelchair at the point of completion should only be applied to social housing
- 5.29. As of July 2017, Breckland has 8,366 households in affordable housing; 26 % have a long term illness or disability and of these, 8.4 % have at least moderate disability.

## The accessibility of the current housing stock (M4(2))

- 5.30. There is no available local data on the accessibility of the current housing stock in Breckland. However, there is national research that can be drawn upon. The English Housing Survey<sup>13</sup> analysed England's housing stock according to the number of 'visitability' features, which include some, but not all of the requirements of M4 (2) and (3). Visitability features are defined as a dwelling having the following:
- Level access: there are no steps between the gate/pavement and the front door into the dwelling to negotiate;
  - Flush threshold: a wheelchair can be wheeled directly into the dwelling, with no obstruction higher than 15mm;
  - Sufficiently wide doors and circulation space;
  - WC at entrance level.
- 5.31. The research found that 95% of the total housing stock (21.5 million homes) is not fully visitable by disabled people including wheelchair users. The research went further to look at the number of houses that had some, all or none of the visitability features, as shown in Table 4. This highlights that whilst completely visitable dwellings are low across all tenures, housing association homes have the highest percentage of homes with all 4 visitability features.

**Table 4: Visitable dwellings by tenure<sup>14</sup>**

Number of visibility features	Owner occupied	Private rented	Local authority	Housing association
None	26.2%	27%	22.7%	18.3%
1 to 3	70.2%	66.3%	71.7%	66.7%
All 4	3.6%	6.7%	5.6%	15%

- 5.32. Further National Research<sup>15</sup> found that the existing housing stock presents significant obstacles for those with mobility problems in terms of physically getting into the dwelling. Only 16% of homes have level access and 20 per cent have a flush threshold. It is interesting that bungalows, many of which were designed specifically with older people in mind, do not score significantly better on these aspects than other types of dwellings. Only

<sup>13</sup> Department for Communities & Local Government (DCLG) (2014) English Housing Survey: Profile of English Housing 2012 [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/335753/EHS\\_Profile\\_of\\_English\\_housing\\_2012.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/335753/EHS_Profile_of_English_housing_2012.pdf)

<sup>14</sup> Department for Communities & Local Government (DCLG) (2014) English Housing Survey: Profile of English Housing 2012 [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/335753/EHS\\_Profile\\_of\\_English\\_housing\\_2012.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/335753/EHS_Profile_of_English_housing_2012.pdf)

<sup>15</sup> Department for Communities & Local Government (DCLG) (2012) Modelling the current and potential accessibility of the housing stock [https://www.housinglin.org.uk/assets/Resources/Housing/OtherOrganisation/Modelling\\_the\\_current\\_and\\_potential\\_accessibility\\_of\\_the\\_housing\\_stock.pdf](https://www.housinglin.org.uk/assets/Resources/Housing/OtherOrganisation/Modelling_the_current_and_potential_accessibility_of_the_housing_stock.pdf)

3.4% of homes were found to possess the four key visitability features of level access, flush threshold, WC at entry level and circulation that meets Part M. Around half of these are newer homes built after 1990 and about a third are owned by registered providers. The same research found that one in six dwellings in England (17%) is a flat and many of these present significant barriers to those with mobility problems. Although tending to score quite well in terms of having level access up to the main entrance of the building and flush thresholds into the building and the individual flat, where they fall down is in the provision of lifts. Of the 2.2 million flats above ground floor level, only 21% of these have a lift of any description and just 1.5% of all upper floor flats have a wheelchair accessible lift.

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

- 5.33. The population of Breckland is ageing and over the next 20 years the percentage of the population within the age brackets 65+ is expected to increase by approximately 66%. As a result the number of dwellings owned by people over the age of 65 is also expected to increase. This has an increased burden on the NHS in various ways, one of which is the increased incidents of falls among people aged over 65. As the population continues to age this issue will become more acute.
- 5.34. Furthermore, the District has approximately 20% suffering from a disability that limits day-to-day activities and approximately 12% of the population aged 18-64 suffer from a moderate or serious physical disability.
- 5.35. As of July 2017, The District has 8,366 households in affordable housing of which 26% have a long term illness or disability and of these 8.4% have at least moderate disability. Furthermore, there are 3,398 total households on the council's waiting list, of which 1,870 are under the criteria 'People who need to move on medical or welfare grounds, including grounds relating to a disability'.
- 5.36. There are currently very few dwellings in the country that are fully visitable, and, together with the information gathered by the Council, this proves that a policy requirement is appropriate and justified. This is in line with the objectives of the

### **If this standard is to be considered, what is the impact on viability?**

- 5.37. As stated earlier, National Planning Practice Guidance states that: "*Local planning authorities should consider the impact of using these [optional] standards as part of their Local Plan viability assessment.*" In other words, any additional costs of implementing these optional standards along with other Local Plan requirements must not be so great that it would make future development financially unviable.
- 5.38. The Department for Communities and Local Government's paper on the cost impacts of the Housing Standards Review set out that implementing M4(2) dwellings would cost approximately £520 to £940 per dwelling. The cost of building to M4(3) standard would be £7,764 to £23,052. Setting a policy which requires developers to build dwellings to these standards would impact on the viability of a development. However, in the absence of a national standard, is considered necessary in order to ensure the provision of a supply of accessible and adaptable homes in the District to meet the need requirements of current and future residents. It is recommended that the number of M4(2) dwellings is limited to reflect local market conditions and generally lower land values, (comparative to south east

England), as highlighted in the Breckland Viability Study. Any requirement for M4(3) standard dwellings should be modest, as these are expensive to build and have a more limited market appeal. Viability should be taken into consideration in setting the targets for code M4(2) dwellings and M4(3) dwellings in new developments. To ensure that targets set for these types of dwellings do not render development unviable, it is recommended that any policy includes a clause to ensure that the standards apply, subject to viability.

## 6. Internal Space Standards

### Why is internal space in a home important?

- 6.1. The amount of space in a home influences how residents live<sup>16</sup>. At its most basic level, the space in a home impacts on:
- How and where people prepare and eat food;
  - How people deal with household waste and recycling;
  - How possessions are stored and how the living space looks and feels to inhabit;
  - What furniture can be used and the activities it enables;
  - Whether people can socialise with guests or other members of the household;
  - How much privacy people have for studying, working from home, relaxing or leisure; and
  - Whether there is room for additional changes to the environment, for example to make life easier if the circumstances or health of members of the household change.
- 6.2. Space standards are intended to ensure that new dwellings provide a reasonable level of internal space to undertake day to day activities, at a given level of occupancy. Lack of adequate space and overcrowding has been shown to have significant impacts on health, educational attainment and family relationships.<sup>17</sup>
- 6.3. Government Guidance<sup>18</sup> identifies that lack of space and over crowding has been linked to psychological distress and various mental disorders. It is also linked to increased heart rate, increased perspiration, intolerance, inability to concentrate, hygiene risks, accidents and spread of contagious disease.
- 6.4. The Government's Nationally Described Space Standard deals with internal space within new dwellings and is suitable for application across all tenures. It sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height. The technical requirements are:
- a) The dwelling provides at least the gross internal floor area and built-in storage area (set out in Table 5 below);
  - b) A dwelling with two or more bedspaces has at least one double (or twin) bedroom; In order to provide one bedspace, a single bedroom has a floor area of at least 7.5m<sup>2</sup> and is at least 2.15m wide;
  - c) In order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m<sup>2</sup>;
  - d) One double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide;
  - e) 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

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<sup>16</sup> The Case for Space, RIBA ( 2011) <https://www.architecture.com/-/media/gathercontent/space-standards-for-homes/additional-documents/ribacaseforspace2011.pdf.pdf>

<sup>17</sup> Chances of a lifetime: the impact of bad housing on children's lives, Shelter (2006) [https://england.shelter.org.uk/\\_data/assets/pdf\\_file/0016/39202/Chance\\_of\\_a\\_Lifetime.pdf](https://england.shelter.org.uk/_data/assets/pdf_file/0016/39202/Chance_of_a_Lifetime.pdf)

<sup>18</sup> Department for Communities and Local Government (2006) Housing Health and Safety Rating System - Guidance for Landlords and Property Related Professionals [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/9425/150940.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/9425/150940.pdf)



- used for storage, assume a general floor area of 1m<sup>2</sup> within the Gross Internal Area);
- f) Any other area that is used solely for storage and has a headroom of 0.9m – 1.5m (such as under eaves) is counted at 50% of its floor area, and any area lower than 0.9m is not counted at all;
- g) 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<sup>2</sup> in a double bedroom and 0.36m<sup>2</sup> in a single bedroom counts towards the built-in storage requirement;
- h) The minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area.

**Table 5: Nationally Described Space Standards: Minimum gross internal floor areas and storage (m<sup>2</sup>) (DCLG, 2015)**

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	124	132	138	

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

- 6.5. Breckland Council does not currently impose internal space standards through a policy in the Core Strategy.
- 6.6. According to National 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 Breckland?

6.7. Breckland Council collects and records data on the number of bedrooms new homes provide but does not collect and record data on the internal floor space. To establish the internal space of new homes a survey was undertaken by the Planning Policy team.

### Survey Methodology

6.8. Gross completions over the 3 years 2014-15 to 2016-17 were used as a starting point for the survey. There were 1904 new homes completed during this period and of these:

- 7% were 1 bedroom dwellings
- 28% were 2 bedroom dwellings;
- 36% were 3 bedroom dwellings;
- 29% were 4+ bedroom dwellings

6.9. A sample of 10 planning permissions were analysed in order to provide a varied sample size of homes built over a 3 year period. This approach allowed for a cross section of development that included affordable housing. Sites were also chosen to demonstrate a sample that covers a wide geographical area across the District. The following table provides a summary of the sites chosen:

**Table 6: Planning permissions analysed and number of dwellings.**

<b>Planning reference</b>	<b>Number of dwellings</b>
3PL/2016/0084	106
3PL/2015/0623/F	33
3PL/2015/0926/D	55
3PL/2014/1361/F	64
3PL/2015/1501/F	38
3PL/2016/0379/F	29
3PL/2015/0562/F	26
3PL/2015/0441/F	12
3PL/2014/0495/F	11
3PL/2017/0257/F	8
<b>Total number of dwellings</b>	<b>382</b>

6.10. Data from each site was taken from planning application documents. From this, each individual house type could be identified and the number of bedrooms and an assessment then made of the intended number of occupants based on the relevant plans and the number of storeys recorded.

6.11. This data was then input into a spreadsheets set up to compare the actual internal floor area of the home with the Nationally Described Space Standard (NDSS) size for the type of home, number of bedrooms and number of intended occupants. The data was analysed to establish a range of information, including the percentage that each home was either above or below the NDSS.

### Key Findings:

6.12. Of the 382 homes surveyed:

- 296 of the homes (77.5 %) met the NDSS (+/-5%)
- 29 of the homes (7.6 %) were more than 10% above the NDSS
- 57 of the homes (14.9 %) were more than 10% below the NDSS
- The average internal space of all homes surveyed was 109m<sup>2</sup>
- The average internal space of all flats surveyed was 61m<sup>2</sup>
- It was generally found that 2 bedroom houses were 4% below NDSS
- It was generally found that 3 bedroom houses were 14.5% above NDSS
- It was generally found that 4 bedroom houses were 13% above NDSS

6.13. Further information on the survey results is available at Appendix 1.

6.14. In December 2010 RIBA commissioned a YouGov poll to test perceptions and preferences about newly built homes. This found that:

- The top three things people look for when moving home are outside space (49%); the size of the rooms (42%); and proximity to local services (42%);
- 31% of people would not consider buying a home built in the last ten years, or would only consider it as a last resort. Of these, 60% said it was because the rooms are too small, 46% said they lack style, and 45% were concerned about the lack of outside space;
- 60% of people who would not buy a new home said that the small size of the rooms was the most important reason for them.

6.15. Further research<sup>19</sup> found that the UK has the smallest homes by floor area in Europe. The reasons for this are complex, but are related to the removal of space standards in the 1980s, the high value of land, and the low number of homes built by public authorities and housing associations.

6.16. In the UK domestic property market it is common to price and compare houses on the basis of the number of bedrooms rather than the floor space, which results in a lack of understanding of space requirements. Whilst the majority of

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<sup>19</sup> Malcolm Morgan & Heather Cruickshank (2014) Quantifying the extent of space shortages: English dwellings, Building Research & Information, 42:6, 710-724

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 homes. Lack of storage space, insufficient space for furniture and lack of space in which to socialise are often cited as particular problems. The Housing Standards Review<sup>20</sup> found that 88% of respondents were in favour of space labelling and 80% were in favour of space standards.

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

- 6.17. Research has shown that the amount of internal space in a home influences how people live and can impact on their health and wellbeing. The local survey undertaken on internal space shows that whilst flats and larger 3, 4 bedroom dwellings are generally being built above the NDSS, smaller 1 and 2 bed properties tend to be built below NDSS. The majority of dwellings surveyed during this period were 2 and 3 bed. Considered overall, the evidence presented supports the case to implement a policy requiring homes to be built to the NDSS.
- 6.18. Ensuring that smaller 1 and 2 bed properties is achieved the NDSS is particularly important when considered in the context of downsizing. The advantages of downsizing to an appropriate home are that people should be able to live more independent lives, in warm, safe surroundings, designed to make life easier for them. This could also reduce the amount of care in the home that they might otherwise need.
- 6.19. In accordance with Paragraph 50 of the NPPF the Council, have sought to assess the accommodation needs for older persons and those living with a disability in the District. Ensuring that an appropriate supply of new build accommodation is both accessible and adaptable will assist in ensuring that the Plan delivers a wide choice of high quality homes that are responsive to a diverse range of needs

### **If this standard is to be considered, what is the impact on viability?**

- 6.20. Setting space standards has a potential impact on viability. In theory, adhering to minimum space standards is likely to enlarge the footprint of an individual dwelling therefore requiring a larger plot size and more land for each dwelling on a development. Reviewing the evidence for recently permitted development in Breckland District demonstrates that 85.1% of development is currently meeting or exceeding the NDSS. Therefore, overall it can be concluded that if most developers are already building to the NDSS standards without a set requirement to do so, the impact on viability is not significant. This is likely to be a result of market demand for larger properties in the District and lower land values

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<sup>20</sup> Department for Communities and Local Government (DCLG) (2014) Housing Standards Review: Summary of Responses  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/289144/140225\\_final\\_hsr\\_summary\\_of\\_responses.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289144/140225_final_hsr_summary_of_responses.pdf)

(comparative to the South East England). The evidence does however highlight that smaller 1 and 2 bedroom homes are not consistently being delivered to NDSS and therefore there is justification for a requirement for these type of new developments to meet NDSS to ensure that all types of properties are reasonably spacious. It is not considered that setting space standards would have a significant impact on viability, as demonstrated by the local evidence; however, any policy should include a clause to state the requirement is subject to viability.

6.21. Paragraph 8.15 of the Local Plan and CIL Viability Assessment states that the modelling is in line with the Nationally Described Space Standard Requirements.

## Appendix 1 : Results of Breckland Council's survey on the internal space of new homes

Number of bedrooms/ people	Flats			Houses								
	1b 2p	2b3p	2b 4p	1b2p	2b3p	2b4p	3b5p	3b6p	4b6p	4b7p	4b8p	5b8p
Number surveyed	30	30	9	37	34	113	72	6	20	12	3	14
Average internal floor space (m2)	50.4 2	62.6	70.1	54	70	75	91	125	107	135	150	182
Average % above/below the NDSS	1%	2.50 %	0%	-7.00%	0%	-5%	-2%	31%	1%	17%	21%	42%