

Note on applying the Nationally Described Space Standard in Hertsmere

Introduction

From 1 October 2015, Local Planning Authorities which wish to require an internal space standard should only do so by reference to the Nationally Described Space Standard in their Local Plan. This should be applied where there is a local need for the standard. Paragraph 2.23 of the Council's emerging Site Allocations and Development Management (SADM) Policies Plan signals the Council's intention to adopt the national standards.

In respect of the consideration and assessment of housing standards as they apply to development proposals, the starting point for decision taking is the development plan.

Policy SP1: Creating sustainable development of the Hertsmere Core Strategy 2013 requires that all development should be 'of high quality design and appropriate in scale, appearance and function to the local context and settlement hierarchy'. Policy CS22 Securing a high quality and accessible environment requires all development to be 'of high quality design, which ensures the creation of attractive and usable places' and 'where practicably possible 100% of new residential units should be built to the Lifetime Homes Standards based on the Joseph Rowntree Foundation standards highlighted in the Council's Planning and Design Guide Supplementary Planning Document'.

Policy SADM3 Residential Developments requires that in developments including flats 'each flat should provide a good standard of accommodation and internal space'.

Policy SADM31 Design Principles in the emerging SADM Policies Plan (submitted for Examination in November 2015) requires that all development 'results in a high quality design' and that all major development should 'ensure an appropriate degree of functionality in terms of internal space, accessibility for users, facility provision and waste storage'. At the same time, the National Planning Policy Framework (NPPF) seeks for high quality design and a good standard of amenity for all existing and future occupants of land and buildings as one of its Core Principles.

The National Planning Policy Framework (NPPF) at Paragraph 7 is clear that the planning system should perform economic, social and environmental roles. At Paragraph 9 it talks about the need for planning to deliver sustainable development, which should include 'widening the choice of high quality homes'. NPPF Paragraph 50, again, states that planning authorities should 'deliver a wide choice of high quality homes'.

Hertsmere Borough Council is in the process of reviewing its Core Strategy which will form the basis for a new consolidated Local Plan. In the meantime the Council intends to apply the Nationally Described Space Standard by reference to this in its updated Design Guide SPD Part D.

The Design Guide SPD, adopted in 2013, contained residential internal space standards based on the space standards in the London Plan, which were calculated on a similar basis as the Nationally Described Space Standard. Both sets of standards relate to the minimum gross internal area (GIA) of the overall unit to the design level of occupancy based on bedroom size and the potential number of bed spaces that could be accommodated, so it is possible to draw a direct comparison between the two.



Justifying local need to apply the standard

The Planning Practice Guidance (PPG) requires local planning authorities to establish a local need for internal space standards and sets out how they can provide justification for this.

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, for example, to consider any potential impact on meeting demand for starter homes.
- **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.

These three areas are discussed individually in the remainder of this document.

Need

The Council monitors the size and type of dwellings being built in the Borough in terms of the number of bedrooms and the overall floorspace of each unit, going back to 2011.

The available data shows that the majority of new dwellings sold in Hertsmere between January 2011 and May 2015 met or exceeded the local space standard introduced in 2013, although at the time some of the associated planning applications were approved no standard was in place in Hertsmere. This demonstrates that in general, units of a reasonable size were being constructed and sold throughout the economic downturn from 2008. However, the data shows that a quarter of 2-bed units fell short of the space standard, as well as almost a fifth of 3-bed units. In order to prevent this trend from recurring it is considered reasonable to retain space standards in the Borough through the adoption of the Nationally Described Space Standards.

Table 1: proportion of new build residential units sold which meet the current local space standards (based on Land Registry price paid data for sales from 13/01/2011 – 22/05/2015)

| | Number of residential units |
|------------------------------------|------------------------------------|
| Exceed Hertsmere standard | 164 |
| Meet Hertsmere standard | 91 |
| Fall below Hertsmere standard | 51 |
| Insufficient information available | 38 |
| Total | 344 |



Table 2: proportion of new build residential units sold which meet the current local space standards by number of bedrooms (based on Land Registry price paid data for sales from 13/01/2011 – 22/05/2015)

| Size of unit | Number of units sold 13/01/2011 – 22/05/2015) | Units meeting or exceeding space standards (%) | Units not meeting space standards (%) |
|---|---|--|---|
| 1 bed | 31 | 100% | 0% |
| 2 bed | 159 | 75% | 25% |
| 3 bed | 29 | 76% | 24% |
| 4 bed | 59 | 97% | 3% |
| 5 bed + | 12 | 100% | 0% |
| Unknown no. of beds and exceeds all space standards | 54 | 30% (exceeding all local space standards) | 70% (below the largest space standard 113m ²) |
| Total | 344 | | |

A report looking at the internal size of new homes in London and south east England – including Hertfordshire – concluded that where dwellings provide inadequate space for people to be reasonably comfortable there is a risk that they would not function effectively as homes.¹ Another report highlights that factors such as the size of a dwelling's main living area, the availability of space for privacy away from other members of a household, the ability to store functional items and the amount of natural light are all considered important indicators of quality by occupiers.² These are all issues that are closely linked to the internal design and layout of a home, and in particular the amount of space provided.

It is considered that there are development pressures and inherent planning constraints within Hertsmere that could result in an impact on the level of space provided within dwellings, without the use of space standards. These include the following factors:

- The Elstree Way Corridor Area Action Plan sets out that the corridor has the potential to deliver 1000 to 1500 homes. These homes will need to be at a higher density than is characteristic across most of Hertsmere, so as part of ensuring that these are the 'high quality homes' sought by the Local Plan and the NPPF the space standards will help to ensure that quality is not compromised.

¹ HATC Ltd, *Room to Swing a Cat?: The Amount and Use of Space in New Dwellings in London & the South East* (March 2010)

² Ipsos MORI and RIBA, *The way we live now: what people need and expect from their homes* (2012)

- The population in Hertsmere is projected to increase from 101,300 people in 2013 (estimated) to 125,417 in 2036³ and the number of households in the Borough is expected to increase by 32.7% by 2036 compared with 2013⁴. This will cause continued pressure for housing development beyond the current 15-year plan period and, if the Council wishes to continue building within existing urban areas, may result in further building at relatively high densities.
- Approximately 80% of the Borough is designated as Green Belt, thereby limiting the availability of developable land and so increasing the pressure to maximise the quantum of new homes on available sites within built up areas.

In order to meet the aim of the NPPF to provide 'high quality homes', the Nationally Described Space Standards should be adopted in Hertsmere to ensure that quality is not compromised through the need to provide a higher density of development looking ahead to the next 20 years.

Viability

The Council's local internal space standards were adopted in 2013, based on the standards in the Draft London Plan 2011. They are very similar to the Nationally Described Space Standards, so the evidence shows that there is unlikely to be a negative impact on the viability of development in the Borough if the new national standards are applied.

The Council monitors the floorspace of new build dwellings sold in the Borough and the sales values of these dwellings including the price per square metre.

The available data shows that the vast majority of new schemes, whether approved before or after the Council introduced its standards in 2013, met or exceeded the local standards, demonstrating that developers were already have been building and selling residential units of a suitable size for some time before the standards were brought in. This includes planning applications determined in 2008 and 2009 during the economic downturn. Therefore it is expected that, if the standards could be met and exceeded in a difficult market, they can be met now that the market has largely recovered locally.

The Council will continue to monitor new dwelling sales in order to capture any notable effects on viability of applying the 2013 local space standards and the Nationally Described Space Standards, which will take several years to become evident.

Comparison of Hertsmere standards with Nationally Described Space Standards

The floorspace requirements in the new national space standards differ from the Hertsmere standards only in the following components:

- The national standards require 1 bedroom, 1 person (1b1p) units to be a minimum of 39m² or 37 m² where a shower is installed instead of a bath. The Hertsmere standards require a minimum of 37 m² in all cases.
- The national standards include an amount of space for built-in storage which Hertsmere's standards do not require;

³ South West Hertfordshire Strategic Housing Market Assessment (SHMA), published 2016, p.40

⁴ Ibid, p.45



- The national standards include additional space standards for the following dwelling types which are not covered by the Hertsmere standards:
 - 1b2p 2-storey units;
 - Standards for 7 and 8 person units; and
 - Standards for 5 and 6 bed units.

In Hertsmere there has been little need for a standard for larger homes (above 4 beds / 6 person), as this type of home in the Borough has tended to be very large and spacious and far exceed any minimum standard, and flats which have more than 3 bedrooms have been very rare. It may be the case that, as development pressures increase, higher-occupancy units are proposed on tighter sites, including larger flats, so it will be useful to have these standards available should this situation arise to protect the living standards of the occupiers of any larger units.

The Design Guide SPD includes guidance on how the space standards might be applied flexibly in certain circumstances, and it is intended that the Nationally Described Standards would be applied with the same degree of flexibility.

These circumstances are where;

- the internal guidelines are exceeded for the most part;
- a building is being subdivided or converted;
- there is a heritage designation constraining the development;
- the site is an irregular shape; and
- other situations where the overall approach accords with the objectives of the SPD and/or accords with the prevailing character of the area, but the standards cannot reasonably be met.

Minimum bedroom sizes

The Council applies minimum bedroom dimensions through its Design Guide SPD Part D. These are slightly more onerous than the Nationally Described Space Standards (see Table 3), although they do not include a minimum width.

Space standards have been applied in Hertsmere since 2013 without a noticeable impact on the viability of development, so it is considered that to continue to use similar standards should not negatively impact on development viability.

Table 3: comparison of bedroom size standards in the Hertsmere Planning and Design Guide Part D and the Nationally Described Space Standards

| Bedroom size | Minimum floor area of bedroom (square metres) | |
|---------------|---|--------------------------------------|
| | <i>Hertsmere Standard</i> | <i>Nationally Described Standard</i> |
| Single | 8 | 7.5 (and at least 2.15m wide) |
| Double / twin | 12 | 11.5 |

Timing

It is not considered that there is a need in Hertsmere for a “transition period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions”. This is because the principles behind the national standard are largely the same as the existing Hertsmere standards adopted in 2013, and the majority of the detail is also very similar as discussed in earlier sections. Developers are therefore accustomed to factoring these standards into land acquisitions in the Borough.

Conclusion

In conclusion it is reasonable for Hertsmere to adopt the Nationally Described Space Standards. Local Plan policies SP1, CS22, SADM3 and SADM31 (together with paragraph 2.23 of the SADM Policies Plan) which require high quality design in line with the NPPF requirement to provide high quality homes are considered to be a suitable basis for the adoption of the national standards. A review of the Core Strategy is currently underway, as part of which the addition of a policy reference to the Standards can be considered.

Evidence shows that there is a need for a space standard in the Borough given the development pressures facing the area within and beyond the current plan period, and the fact that around a quarter of 2-bedroom and a fifth of 3-bedroom units were sub-standard, in terms of their size, prior to the introduction of the local design standard in 2013. The viability would not be unduly affected due to the fact that local space standards have existed in Hertsmere since 2013, and similarly, there is no need for a transitional period before the national standards are fully adopted.

Therefore the Nationally Described Space Standards will be incorporated into the current review of the Planning and Design Guide SPD and will replace the local space standards within the 2013 version of the SPD.