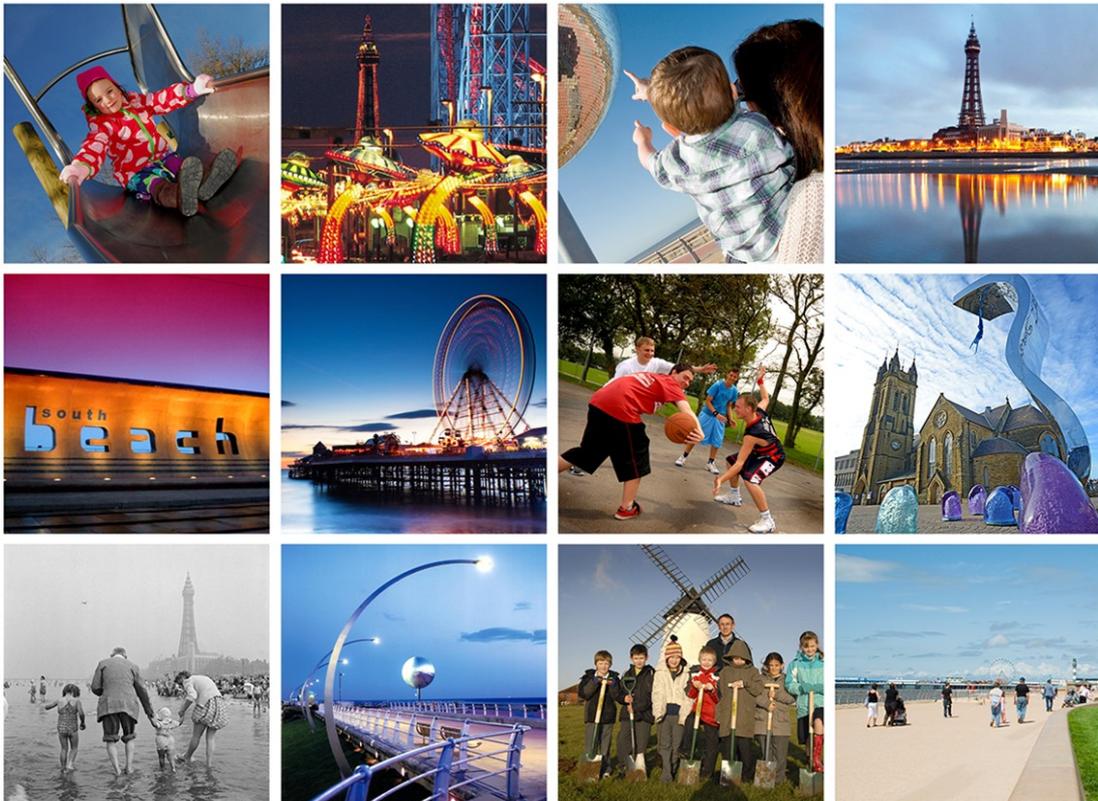


Blackpool Local Plan Part 2 Evidence Base

Topic Paper: Space Standards and Accessible or Adaptable Homes

December 2020

Blackpool Council



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1.0 Introduction

1.1 The purpose of this Topic Paper is to provide background information on the introduction of the government's Nationally Described Space Standards¹ and the enhanced optional standards for accessible and adaptable housing in the Part 2 of the Local Plan: Site Allocations and Development Management Policies. The proposed standards set out in Policy DM1 Housing Design Requirements for New Build Housing Developments complement the objective of the adopted Core Strategy to improve quality, choice and mix of housing in the town. The approach is therefore consistent with paragraph 61 of the National Planning Policy Framework (NPPF) (2019) which sets out that Local Planning Authorities (LPAs) should seek to ensure that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

1.2 In 2015 the Government introduced the Nationally Described Space Standard (NDSS), following on from the Housing Standards Review². Whilst the majority of the recommendations of the Review were incorporated into Building Regulations, the space and enhanced accessibility standards were treated as optional standards that Local Planning Authorities can adopt through their Local Plan where there is a demonstrated local need.

1.3 The National Planning Practice Guidance (NPPG) sets out that where a local planning authority seeks to introduce an internal space standard in accordance with the NPPF, they should only do so by reference to the Nationally Described Space Standards. LPAs will however 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.

1.4 This Topic Paper therefore provides evidence of need for the optional technical standards relating to space standards and accessible and adaptable homes in Blackpool and demonstrates that the introduction of these enhanced optional standards will not have a significant impact on the viability of development in the town.

2.0 Policy Context

2.1 Adopted Core Strategy policies CS12 - Sustainable Neighbourhoods and CS13 - Housing Mix, Density and Standards require high quality housing which will meet the needs and aspirations of Blackpool residents and meets the relevant standards in place for conversions or new builds. Policy CS13 confirms that consideration will be given to applying the Nationally Described Space Standard through the preparation of Part 2 of the Local Plan, subject to the required consultation process and viability assessment. Policy CS7 (Quality of Design) requires development to be accessible to special groups in the community such as those with disabilities and the elderly.

¹ [Technical Housing Standards – Nationally Described Space Standard](#)

² [Housing Standards Review](#)

2.2 Policy DM1: Design Requirements for New Build Housing Developments in the Publication version of the Local Plan Part 2 introduces the following policy requirements relating to residential space and accessibility standards:

- As a minimum, 20% of all new build dwellings on a site must meet the Nationally Described Space Standard (or any future successor);
- On new build sites of 10 dwellings or more, at least 10% of dwellings should be designed to be accessible and adaptable in accordance with technical standard M4(2) or suitable for wheelchair users in accordance with M4(3) of the Building Regulations (or as updated).

[Appendix 1](#) contains the Nationally Described Space Standards.

3.0 Space Standards Evidence

3.1 The NPPG states that in order to require the use of the space standard, the LPA should take account of three broad criteria:

- Need – based on evidence of the size and type of dwellings currently being built in the area in order to ensure that the impacts of adopting the standard are properly assessed.
- Viability – looking at the potential impact of adoption on housing supply and affordability and;
- Timing – whether there should be a transition period following adoption of a policy to enable the impacts to be factored into future land acquisitions.

3.2 It should be noted that the Council has been applying the Nationally Described Space Standards to proposals for residential conversions since their introduction in 2015 with further requirements set out in the [New Homes from Old Places Supplementary Planning Document](#) [PDF 1,440KB]. In the vast majority of cases, the space standards have been accepted in conversions. There is no evidence that the application of Nationally Described Space Standard in residential conversions has been resisted, or that applying the space standards has reduced the number of residential conversion applications being submitted. In order to provide the high quality homes that Blackpool needs and to assist in re-balancing the housing market which is skewed towards small, poor quality and over-crowded housing, it is important that new build dwellings meet the same Nationally Described Space Standards that are required for conversions, wherever possible.

3.3 The section below considers the implications of applying the Nationally Described Space Standards against the three criteria set out in the National Planning Practice Guidance.

The need for new homes to meet the Nationally Described Space Standards

3.4 Blackpool has one of the country's greatest concentrations of socio-economic deprivation and a unique and extreme set of housing challenges as a consequence of decades of decline in traditional tourism sectors. This challenging housing market is evidenced in the [Fylde Coast Strategic Housing Market Assessment](#) [PDF 5,072KB], the [Blackpool Council Housing Strategy 2018-2023](#) [PDF 851KB] and is described in the Spatial Portrait of Blackpool in [the Core Strategy](#) [PDF 135.35MB] (Adopted 2016).

3.5 Blackpool is characterised by an oversupply of poor quality one-person accommodation, limited choice of family housing particularly in the Inner Area, and a shortage of good quality affordable housing across the town.

3.6 Housing which doesn't meet the needs of changing household circumstances either leads to overcrowding and associated problems or results in households moving on frequently. Transient and unsettled communities has been an identified problem in Blackpool for a long time. Population turnover statistics identify that inner Blackpool has extremely high numbers of people moving into and out of the town and also movement within the town. Transience can reduce community cohesion and increase social isolation, as well as contributing to poor social and economic outcomes for individuals and families. Frequent residential and school mobility has a negative effect on early educational attainment, with school moves having the biggest impact.

3.7 The challenges faced by Blackpool's economy are closely related to the health of its population and the association between low income, poverty, deprivation, living environment and poor mental and/or physical health is well established.

3.8 Establishing a better housing offer in Blackpool through the development of new homes which are suitable for the needs of their occupants is especially important to the economic prosperity in Blackpool given the lack of housing choice, especially for families.

3.9 In recent years there has been growing public concern nationally about the quality of new homes. As house prices have increased, alongside a relative lack of choice for homebuyers in light of intense competition for new homes, there has been concern that developers have been reducing dwellings sizes in order to maximise value. In response to these concerns, the Nationally Described Space Standards were introduced in 2015. Whilst the needs of families will vary significantly, the Nationally Described Space Standards represent a benchmark for all new dwellings across the country and across tenures, which balances being achievable and ensuring adequate space. The National Planning Practice Guidance makes clear it is the only standard that local planning authorities should use.

3.10 When buying a new home, space is one of the most important factors to consider. A study by [Shelter](#) [PDF 235KB] in 2013 identified that 44% of the public would be more likely to support the building of new housing if homes were larger. Research by YouGov in 2010

also identified that 42% of people put the size of rooms as the most important factor when buying a new home. There is a clear perception that new homes are being built with rooms that are too small and this was the main reason (60%) why people are unwilling to choose a new home built in the last 10 years³.

3.11 The Nationally Described Space Standards set out minimum gross internal floor areas and associated requirements, including for storage and takes into account commonly required furniture and the spaces needed for different activities and moving around.

3.12 A range of new build housing development has taken place in Blackpool in recent years and consideration has been given to the approved house types, the bedroom sizes and total floor areas in order to assess whether the houses provided sufficient floor space. Whilst this does not consider the full technical aspects of the Nationally Described Space Standards, it does enable comparison of the floor space of houses coming forward against the standards.

3.13 A total of 30 housing schemes have been assessed which have been granted planning permission since 2013, totalling 1702 houses and completed by a range of local and national house builders. The smaller the scheme, the more likely that the houses would meet Nationally Described Space Standards.

3.14 Out of the 30 schemes, only 10 were 100% NDSS compliant (53 houses in total or 3.1% of the houses assessed).

3.15 A pattern emerges, particularly in major schemes (10+ houses) that the smaller 1, 2 and 3 bedroom properties at the lower end of the housing market are frequently falling below the Nationally Described Space Standards in terms of gross internal floor space. The larger properties of 4 or more bedrooms do well in meeting the standards, although it would be expected that more of the 4b7p house types would meet the minimum floor space requirements, with just 64% meeting the standards in Blackpool.

Bedroom size trends

3.16 The main bedroom is normally the largest and NDSS requires them to measure 11.5m² and be at least 2.75m wide. 72.6% of the main bedrooms assessed, met the Nationally Described Space Standards.

3.17 Any further double or twin rooms that follow must also be 11.5m² in area but the minimum width required is lower at 2.55m. In order to provide one bedspace, a single bedroom has a floor area of at least 7.5m² and is at least 2.15m wide

3.18 Of the schemes assessed, 55.9% of second bedrooms, 55.6% of third bedrooms and 65% of fourth bedrooms didn't meet the Nationally Described Space Standards.

³ [The Case for Space RIBA](#)

3.19 Overall, this reveals that bedroom sizes and particularly secondary bedrooms are consistently under standards. In some of the housing developments in Blackpool, the bedroom sizes in some standard house types result in three bed homes without an adequately sized double bedroom and/or single bedrooms unsuitable for a full size single bed and other furniture or space to play or study.

3.20 Using the minimum bedroom sizes in the Nationally Described Space Standards, some standard house types in recent developments would provide a 3 bedroom dwelling only suitable for 2 people as only 2 of the bedrooms meets the minimum floorspace standards for single bedrooms. This is concerning given the ongoing trend of older children living at home well into their adulthood (71% of adults in their early 20's, 54% of adults in their late 20's and 33% in their early 30's are living in their parents' home⁴).

3.21 New homes should have adequately sized rooms and efficient room layouts which are functional and fit for purpose to meet the changing needs of occupiers. To ensure that new build housing development is of a good quality and suitable for all types of families at any stage in their lives, new build dwellings should meet the Nationally Described Space Standards or any future successor.

The need for accessible and adaptable homes

3.22 The National Planning Policy Framework is clear that local planning authorities should plan to create safe, accessible environments and promote inclusion and community cohesion. This includes buildings and their surrounding spaces. Local planning authorities should take account of evidence that demonstrates a clear need for housing for people with specific housing needs and plan to meet this need.

3.23 Based on the housing needs assessment and other available datasets, the National Planning Policy Framework states that it will be for local planning authorities to set out how they intend to approach demonstrating the need for M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations.

3.24 Older people have specific accommodation needs, for example, a home free from hazards to prevent falls, or that is wheelchair-accessible, or that is single storey to improve mobility. Older people tend to feel the cold and need housing that is easy to heat and is well-insulated. "Fuel poverty" is defined as where an unacceptably high proportion of income needs to be spent on heating. The 2019 annual fuel poverty statistics⁵ show that since 2013 the proportion of households aged 75 and over in fuel poverty has been increasing.

⁴ [Home Truths – Young adults living with their parents in low to middle income families](#) [PDF706KB] – Loughborough University September 2020

⁵ [Annual Fuel Poverty Statistics](#) [PDF 2,096KB] 2019

3.25 The proportion of those aged 65 and over in the UK was 18% in 2016, and is expected to rise steadily to around 24.2% by 2038 (local projections indicate 26% of the population will be over 65 in Blackpool by 2038)⁶- yet only 7% of existing homes in the UK currently meet basic accessibility requirements for the elderly. The number of people aged 85 and over will more than double in the UK in the next 25 years, with forecasts suggesting that nearly 90% of local authorities are each likely to require at least 1,000 additional specialist dwellings by 2035⁷.

3.26 [Blackpool Councils Housing Plan for the Ageing Population](#) [PDF 1,403KB] confirms that older people play an important role in Blackpool's future and the Council are committed to making sure that Blackpool is a great place to live where healthy later life is enjoyed by everyone. The Council respects people's wishes to remain independent for as long as possible and are keen to develop support models to help people as they move from one life stage to another. Blackpool's Housing Plan for the Ageing Population confirms that the Council will work with developers to increase the range of housing provision for older people to ensure new homes within the borough positively reflect the hopes and desires we all have for later life. The Council's Housing Plan for the Ageing Population confirms that Blackpool has a higher proportion of people over the age of 65 living in Blackpool than the national average for England and Wales and that women are living longer than men with a noticeable difference from the age of 75 onwards. The over 65 population is projected to rise by 28% from 28,500 in 2014 to 36,500 in 2038 and will then make up over a quarter (26%) of Blackpool's total population.

3.27 Given Blackpool Council's longstanding policy of 'shifting the balance of care' it is essential to plan now so that the housing stock in Blackpool can meet future demand. Blackpool Council's [Joint Strategic Needs Assessment](#) (JSNA) (opens a new window) identifies housing as a wider determinant of better health. Poor housing has an adverse effect on an individual's physical and mental wellbeing. Older people are more likely to live with chronic health conditions which can be exacerbated by poor quality housing.

3.28 The Council's Care and Repair Service is under immense pressure and has a historical backlog of requests to provide adaptations to existing homes to enable older people and people with disabilities, to stay in their own home. In 2015 residents were waiting approximately 2 ½ years to have their adaptation application approved. Just under ¾ of requests for adaptations received for the same period by the Care & Repair Team are by owner occupiers

3.29 Demand from older people for health, social care, and housing-related services is rising significantly and services will struggle to cope unless this demand is addressed by enabling more people to help themselves through housing that promotes independence.

⁶ [Office for National Statistics Population Estimates 2019](#) (opens a new window)

⁷ [Centre for Ageing Better 2019](#) (opens a new window)

3.30 Whilst most older people in Blackpool are home owners and want to stay within their own home, many look to move into accommodation with support in the social rented sector, often because their existing homes are unsuitable as their health needs change.

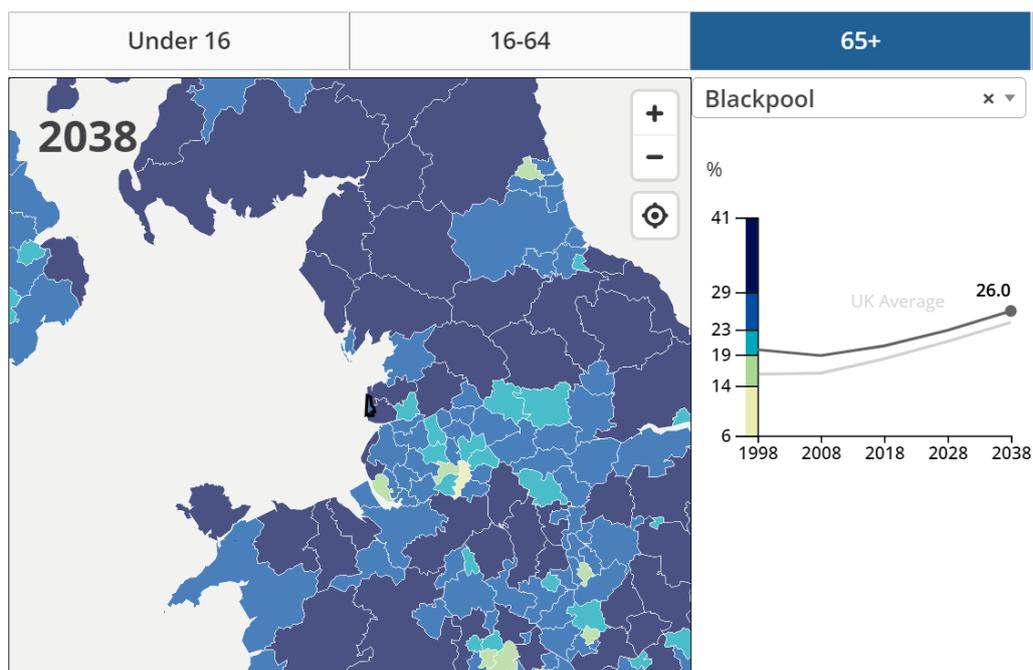
3.31 An ageing population in Blackpool will increase the number of people whose mobility is impaired by physical disability. When people live in poor quality housing or housing that is not appropriate for their needs, poor mobility and risk of falls increases, and demand increases for adaptations.

3.32 A substantial proportion of older person households currently under-occupy their homes and there is a lack of provision of homes designed for older people's needs. It is therefore important to provide more appropriate and accessible new homes in the general market. The [Fylde Coast Strategic Housing Market Assessment](#) [PDF 5,072KB] states there exists the potential to 'free up' existing family housing through the provision of appropriate accessible dwellings which match the aspirations of a growing older person cohort.

3.33 Given the current lack of accessible and adaptable homes and the projected future demands, Policy DM1 requires that on new build sites of 10 dwellings or more, at least 10% of dwellings should be designed to be accessible and adaptable in accordance with technical standard M4(2) or suitable for wheelchair users in accordance with M4(3) of the Building Regulations (or as updated).

3.34 The Equality Impact Assessment January 2021 acknowledges that Policy DM1 would ensure that there is a variety of good quality housing in sustainable locations which will particularly benefit those with age and disability characteristics.

Figure 1 Office for National Statistics projected populations growth in the over 65's in Blackpool



4.0 Viability

4.1 Introducing the Nationally Described Space Standards and a requirement for accessible and adaptable homes was broadly supported at the informal consultation in 2019, as long as the Council could demonstrate it was necessary and that viability was considered.

4.2 The viability implications of applying the Nationally Described Space Standards and requiring accessible and adaptable homes have been examined through work commissioned by the Council to ensure that all of the policies in the Local Plan are deliverable and are fully informed by careful viability analysis. Lambert Smith Hampton was appointed in June 2019 to prepare an Economic Viability Assessment which forms part of the evidence base informing and supporting the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies. The Local Plan Viability Assessment was finalised in July 2020 and the advice therein resulted in changes to Policy DM1 from requiring 100% of all new housing development to meet the Nationally Described Space Standards, to just 20%, and changed the accessible and adaptable homes requirement from 20%, to 10%.

4.3 The Local Plan Viability Assessment confirms that a requirements for 20% of new build homes to meet the Nationally Described Space Standards and 10% to be accessible and adaptable are viable. However, it is understood that some sites may have particular challenges with viability and issues around viability will be assessed on a case by case basis.

5.0 Timing

5.1 With reference to the timing of introduction of the Nationally Described Space Standards, the Planning Practice Guidance suggests that a transitional period may be required following adoption of such a standard to enable any additional costs to be considered within land acquisitions.

5.2 The development industry (developers, landowners and planning agents/consultants) who are active within Blackpool have been aware of the Council's intention to introduce minimum internal space standards and accessible and adaptable homes since January 2019 when the Council undertook an informal consultation on a draft version of the Local Plan, Part 2: Site Allocations and Development Management Policies document and a number of agents and developers responded to consultations. Furthermore, the Council's intention to investigate introducing such standards is set out in the supporting text of adopted Core Strategy Policy CS13: Housing Mix Density and Standards, and the Core Strategy includes Policy CS7: Quality of Design which requires new development to be accessible to special groups in the community such as those with disabilities and the elderly.

5.3 Whilst the Nationally Described Space Standards are not used at this stage by the Council to refuse planning applications for new build dwellings which do not meet the

standards, it is proving to be a helpful indicator for both planning officers and developers in terms of assessing the quality of the design and layout of schemes. Furthermore, applications for changes of use to new dwellings have had to comply with Nationally Described Space Standards since they were introduced in 2015. As such the Council does not consider it necessary to provide any transitional arrangements regarding the proposed space standards policy.

Appendix 1 – Nationally Described Space Standards

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwelling	2 storey dwelling	3 storey dwelling	Built-in storage
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

Technical requirements

The standard requires that:

- a. the dwelling provides at least the gross internal floor area and built-in storage area set out in Table 1 below
- b. a dwelling with two or more bedspaces has at least one double (or twin) bedroom
- c. in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m² and is at least 2.15m wide
- d. in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m²
- e. one double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide
- f. any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1m² within the Gross Internal Area)
- g. any other area that is used solely for storage and has a headroom of 900- 1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all

- h. a built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72m² in a double bedroom and 0.36m² in a single bedroom counts towards the built-in storage requirement
- i. the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area