**Chichester District Council**

**Residential Space Standards**

**Evidence Study**

[**www.chichester.gov.uk**](http://www.chichester.gov.uk/) **September 2023**

**1 Introduction**

1.1 The purpose of this paper is to provide and explain evidence that demonstrates and justifies the need within the Chichester District Local Plan Area to adopt the Nationally Described Space Standard (NDSS). The proposed adoption of the standard within Policy P6 of the Submission Local Plan would help to ensure that new dwellings meet minimum internal size requirements, providing a suitably high standard of amenity for future residents.

**2 National Context**

2.1 Paragraph 130 of the National Planning Policy Framework (NPPF) states that planning policies should create places that are safe, inclusive, and accessible, and which promote health and well-being, with a high standard of amenity for existing and future users. Footnote 49 of the paragraph further states that policies may make use of the NDSS where the need for an internal space standard can be justified.

2.2 The NDSS, published in March 2015, sets out optional requirements for the Gross Internal Area (GIA) of new dwellings at a defined level of occupancy, as well as floor area and dimensions for key parts of the home, notably bedrooms (Annex A with Table 1 provides the technical requirements of the standard). Accompanying sections of the Planning Practice Guidance (PPG) advise local planning authorities (LPAs) to gather evidence to determine whether there is a need for deployment of the standards in their area. Furthermore, LPAs are expected to provide justifications for internal space policies, taking account of the following considerations:

* “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 the 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.”[[1]](#footnote-1)

**3. Chichester Local Plan 2014-2029**

3.1 The Adopted Local Plan recognises the importance of designing and constructing new homes to a high quality with good standards of internal space. Policy 33 (New Residential Development) states that planning permissions will be granted for new residential development and replacement dwellings where it can be demonstrated that the proposals provide for a high-quality living environment in keeping with the character of the surrounding area and its setting. The policy cites key design criteria to be considered, including layout, density, size, and scale, but does not prescribe specific standards to be met. This is reflective of when the Plan was produced, as whilst it was adopted just after the publication of the NDSS, its production inevitably predates them. The current Local Plan was submitted for Examination on 28 May 2014, with the hearings held between September – December that year, meaning it would have been impractical to try and introduce the NDSS at such a late stage in the process.

**4. Chichester Proposed Submission Local Plan 2021-2039**

4.1 Policy P6 (Amenity) of the proposed submission Local Plan requires all development to ensure that it provides all potential users with an acceptable level of amenity. This includes a specific section on space standards in relation to housing. The policy applies to:

a) All dwellings in new build developments, regardless of tenure; and

b) Where practicable, having regard to the physical constraints of the existing building, changes of use and conversions.

The policy requires for the gross internal floor area of new dwellings (excluding purpose-built accommodation, hotels, residential institutions) to meet as a minimum the NDSS (or any subsequent standards). It further states that built-in internal storage areas are included within the overall minimum gross internal areas. Garage, balconies, detached ancillary buildings and communal areas shared with other dwellings will not be considered to contribute towards meeting the minimum space standards.

4.2 This wording is considered to be more complex than is strictly necessary and is not as succinct as wording used in most Local Plans which adopt the NDSS. Consequently, to help ensure clarity in interpretation and implementation, a modification to Policy P6 is proposed as follows:

*Housing Space Standards*

*All new dwellings (excluding purpose-built student accommodation, hotels, residential institutions) shall meet as a minimum the national described space standards (or any subsequent standards) including:*

1. *All dwellings in new build development, regardless of tenure;*
2. *Where practicable, having regard to the physical constraints of the existing building, changes of use and conversions.*

4.3 It is suggested that the proposed modification is broadly consistent with the proposed wording of Policy DM2 within the Preferred Approach, previously subject to Regulation 18 Consultation. The removal of surplus text relating to GIA definitions is also proposed to aid clarity, recognising the existence of national codes to this end[[2]](#footnote-2).

**5 Methodology**

5.1 To establish need within the Chichester District Local Plan area, sample plans from planning applications for new dwellings permitted[[3]](#footnote-3) within the past three years (from 1 March 2020) were analysed. The three-year period was considered appropriate as it provides data from dwellings developed most recently, and would reflect, if applicable, the voluntary adoption of NDSS by developers, following the 2015 introduction of the standard.

5.2 A sample size of 1110 dwellings was evaluated and is considered to provide a reasonable representation of housing within the Plan area, being calculated to comprise approximately 66% of the new dwellings commenced or completed within the period[[4]](#footnote-4). This sample size also compares favourably with conventions established by other LPAs, exceeding minimum sample sizes analysed elsewhere (see Appendix C). For developments where more than one dwelling is permitted, each dwelling type was measured and analysed, and the results multiplied by the number of dwellings of that type within the scheme.

5.3 In accordance with PPG requirements, the sampled plans relate to a range of dwelling sizes and types being developed in the Plan area, and also an array of different site typologies, comprising: 1-5 bedroom dwellings; flats and houses of 1-3 storeys; small (≤10 dwellings), medium (>10<50) and large (≥50) scale developments; market and affordable housing; urban and rural locations; new build and conversions. A detailed breakdown is provided within Appendix B.

5.4 Developments permitted via prior approval were excluded from the sample on the grounds of being irrelevant to the study, following April 2021 amendments to the Town and Country Planning (General Permitted Development) England Order 2015 requiring their compliance with the NDSS.

5.5 The analysis involved the digital measuring of scaled plans. Where developer-submitted accommodation schedules provided figures for GIA or other dimensions, these were sampled and verified as accurate. Recognising the potential for inaccuracies in digital measuring techniques, calculations of GIA are rounded to the nearest square metre. NDSS technical requirements stipulate bedroom area sizes to within 0.5 square metres, and singular dimensions to within 0.05m. Measurements have therefore been rounded to nearest 0.1m to enable comparison with the requirements, whilst allowing reasonable margins of error due to measuring.

5.6 The provision of sectional drawings showing ceiling heights is not routine for planning applications. NDSS technical requirements relating to ceiling height have not, therefore, been evaluated on this basis. Where plans show headroom heights below 1500mm and 900mm, GIA and bedroom floor area calculations have been adjusted according to NDSS requirements f. and g respectively (see Appendix A for details).

5.7 The evaluation documented the GIA of each dwelling analysed, as well as its bedroom areas, widths, and areas of built-in storage (where illustrated). Appendix B provides this detailed evidence. Dwellings were determined to have failed to meet the overall NDSS standard if GIA, bedroom area or bedroom width requirements were not met. Built-in bedroom storage, whilst documented, was not considered to be a determining factor, recognising that submitted floor plans may not routinely illustrate this provision as this level of detail is not currently required.

**6 Analysis and Evaluation of Need**

6.1 Evidence collated illustrates that the majority of dwellings recently permitted in the Plan Area do not meet the NDSS as a minimum. Of the 1110 dwellings within the sample, plans for only 35% (383 dwellings) were determined to have met the assessed NDSS requirements of GIA, bedroom area and bedroom width, suggesting insufficient internal space was provided to ensure an appropriate standard of amenity for the intended number of occupants. While direct comparisons with the findings of studies conducted by other authorities is difficult due to the range of methodologies used, the analysis suggests Chichester’s proposed adoption of the NDSS to improve amenity standards is similarly justified (see Appendix C for further details).

6.2 While 65% (726 dwellings) of CDC sampled dwellings met the criteria for GIA, only 40% (448 dwellings) meet the bedroom size (area and width) criteria. With the majority of dwellings failing to meet bedroom space parameters, the evidence suggests dwelling are inappropriately configured to enable an appropriate standard of amenity for future occupants.

6.3 A higher proportion of dwellings sampled met the GIA requirements but not the bedroom size elements. This suggests that implementation of the NDSS within the Chichester Local Plan area is not likely to result in increases to residential plot sizes in the majority of instances. More likely, NDSS implementation would ensure that the internal layout of the dwellings was more carefully designed to ensure provision of bedrooms of appropriate sizes, providing suitably high standards of occupant amenity through sufficient space and flexibility for either one double bed, or one or two single beds (depending on dimensions), plus storage and associated circulation space.

6.4 Considering the type of dwellings sampled in terms of number of bedrooms, 1-bedroom properties were least likely to meet NDSS, with only 30% meeting the criteria measured (in terms of GIA and/or bedroom sizes). The majority of 2-bedroom, 3 bedroom and 4-bedroom properties were, however, also unlikely to meet the criteria.

6.5 Dwellings within large developments were less likely to meet the criteria than those within smaller schemes, with only 32% meeting the NDSS, compared with 44% and 88% for medium and small schemes respectively. This suggests a policy requiring compliance with NDSS would proportionately impact the developers of larger schemes, who are assessed more likely to work nationally than developers of small and medium schemes. While this would require some adaption by the large developers/housebuilders, it would be consistent with evidence within the Government’s own Housing Standards Review[[5]](#footnote-5), which suggests ‘volume developers’ would benefit from ensuring designs meet NDSS as a minimum to avoid the need to re-design and re-check dwelling and bedroom dimensions in each individual local authority area.

6.6 48% of sampled dwellings categorised as affordable (155 of a total of 321) met the NDSS criteria, in comparison with only 29% of the market dwellings (228 of 789). This disparity may be due to permissions for affordable dwellings being considered in terms of their compliance with the CDC Planning Obligations and Affordable Housing Supplementary Planning Document (July 2016), which requires units to be designed to meet or exceed the Design and Quality Standards of the Homes and Communities Agency, including minimum GIAs in accordance with Housing Quality Indicators (HQI). Both the Design and Quality Standards and the HQI have since been withdrawn (in October 2019 and March 2023 respectively). Homes England (replacing the Home and Communities Agency) has not set replacement mandatory minimum size standards, referring to LPA use of NDSS as a planning consideration as an alternative[[6]](#footnote-6).

6.7 The proposed submission Local Plan policy to require compliance with NDSS, for both market as well as affordable housing, is therefore anticipated to ensure minimum space standards are met for all tenures, a betterment and broadening of the standards required within the existing SPD, demonstrated to be only partially effective.

6.8 Considering bedroom trends in more detail, for those dwellings failing the NDSS bedroom size criteria, the majority (64%) failed with regards to secondary bedrooms in comparison with primary or sole bedrooms. This result suggests developer prioritisation of main bedrooms with regards to space, but that new dwellings are consistently providing insufficient bedroom space for the total number of occupants stated within planning submissions i.e. a 2-bedroom, 4-person dwelling only providing sufficient space for 3 persons.

**7. Viability**

7.1 The impact of NDSS compliance on housing supply and affordability has been robustly considered. The Local Plan Viability Assessment Stages 1 and 2, assumed minimum dwelling sizes considered in terms of GIA, consistent with the NDSS requirements. The findings of the Stage 1 assessment were that appropriate dwelling sizes had been allowed and the approach to require NDSS compliance was considered viable, representing more of an early-stage planning and feasibility factor than a significant, clear negative viability impact.

7.2 The Viability Assessment is supported by the evidence within this analysis that demonstrates the majority (65%) of sampled dwellings comply with NDSS GIA criteria, suggesting the proposed adoption of NDSS will not prompt developers to increase GIAs and therefore the overall footprints of dwellings in the majority of cases. It follows that housing density within developments will be less likely affected as a consequence, minimising possible impacts on housing supply. In view of its strategic nature, the Viability Assessment did not consider the specifics of how overall GIA is apportioned within a dwelling. It is assumed that any internal design improvements necessary to ensure compliance with NDSS bedroom size criteria are unlikely to have a significant viability impact. While developers may incur costs associated with altering designs, it is suggested there is opportunity for the ‘volume developers’ most likely affected to apply improvements from re-design to schemes within other authorities which require NDSS, as previously referenced within para. 6.4.

**8. Timing**

8.1 The Chichester Local Plan 2021 – 2039: Proposed Submission states the Council’s intention for all new dwellings to meet NDSS with regards to GIA, and has recently been subject to Regulation 19 consultation, being acknowledged by developers within their related representations. The Council has produced and published this paper providing evidence to demonstrate the need for the NDSS to be adopted to inform the examination.

8.2 The public, including developers and supporting agents most likely to be affected by the proposed policy requirement, were first made aware of the Council’s intention to propose NDSS compliance during the Regulation 18 Preferred Approach consultation in December 2018. Representations received from developers and the Home Builders Federation with regards to the emerging policy (DM2) demonstrate this awareness. No concerns regarding the viability of the proposed NDSS compliance were represented at this stage. On this basis, recognising the length of time since the Regulation 18 consultation, the Council does not consider it necessary to provide any transitional arrangements regarding the proposed space standards policy.

8.3 To support the adoption of the policy requirement, and to ensure timely and accurate assessments of NDSS compliance within the consideration of planning applications, it is recommended that the CDC Local List is updated to require developers to provide detailed accommodation schedules summarising proposed GIA, bedroom and storage dimensions, and bedspaces, in addition to scaled plans.

**9. Compatibility with Accessibility Standards**

9.1 In response to a consultation conducted in 2020, the Government is proposing to mandate the currently optional M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations as a minimum standard for all new homes. This is subject to a further consultation on the technical details[[7]](#footnote-7). Given that this is another standard which will be applied to dwellings and is designed to impose certain standards, and which could increase the size of dwellings, it is considered pertinent to consider how this standard relates to and has a bearing on the necessity of adopting the NDSS.

9.3 The current technical requirements for M4(2) relate to provision for people to gain access to and use dwellings. The specifications include internal circulation areas and doorway dimensions, as well as clear access routes and zones within living spaces, bedrooms, and bathrooms. Minimum GIA, bedroom or built-in storage dimensions are not specified and therefore M4(2) is not directly comparable with the NDSS.

9.2 One developer respondent to the Regulation 19 consultation raises the potential cumulative impact of mandated NDSS and M4(2) compliance on housing density. However, whilst the combined impacts cannot be fully assessed until the technical requirements of M4(2) are determined, it is anticipated that the standards will be complementary, NDSS having been recognised as a potential common minimum baseline within the Government’s consultation. It is, therefore, considered reasonable to presume there will be no conflict between the two Standards. Furthermore, there is provision for flexibility, with the Government proposing for exceptional circumstances to be considered if the application of M4(2) is justified as being impractical and unachievable on specific sites.

**10. Summary**

10.1 The results of the sample analysis demonstrate the need for adoption of the NDSS within the proposed Submission Local Plan based on the failure of the majority of permitted developments to meet these minimum standards. Compliance with the NDSS will ensure developments provide sufficient bedroom sizes, in addition to gross internal areas, resulting in higher quality new dwellings offering a good standard of amenity to future occupants. Furthermore, it is considered that justification of NDSS need, viability and timing as advised by the PPG has been appropriately addressed. NDSS adoption is separate to, but likely complementary with, the proposed future mandating of M4(2) Building Regulation to ensure dwelling accessibility and adaptability.

**Appendix A Nationally Described Space Standard – Technical Requirements**

The standard requires that:

1. The dwelling provides at least the gross internal floor area and built-in storage area set out in Table 1;
2. A dwelling with two or more bedspaces has at least one double (or twin bedroom);
3. In order to provide one bedspace, a single bedroom has a floor area of at least 7.5 square meters and is at least 2.15m wide;
4. In order to provide two bedspaces, a double (or twin bedroom as a floor are of at least 11.5 square metres;
5. One double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide;
6. Any area within 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 1 square metre within the gross internal area;
7. 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;
8. 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 0.72square metres in a double bedroom and 0.36 square metres in a single bedroom counts towards the built-in storage requirement;
9. The minimum floor to ceiling height is 2.3m from at least 75% of the gross internal area.



**Appendix C: Other Local Authority Space Standards Evidence Findings for Purposes of Comparison**

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| LPA | Date of Study | Method | Findings | Link |
| Blackpool Council | Dec 2020 | Undefined – presumably all criteria. | 3% met all criteria (53 of 1702 dwellings); smaller schemes and larger properties more likely to meet criteria | [Space Standards and Accessible Homes Topic Paper Final Dec 2020 (blackpool.gov.uk)](https://www.blackpool.gov.uk/Residents/Planning-environment-and-community/Documents/Local-plan-2021/Space-Standards-and-Accessible-Homes-Topic-Paper-Final-Dec-2020.pdf#:~:text=3.0%20Space%20Standards%20Evidence%203.1%20The%20NPPG%20states,impacts%20of%20adopting%20the%20standard%20are%20properly%20assessed.) |
| Colchester Borough Council | Unknown | GIA, bedroom and storage | 12% met all criteria; 67% met GIA | [CBC-Local-Plan-CBC-Space-Study---evidence-base-EBC 2.18 CBC Space Study.pdf (windows.net)](https://cbccrmdata.blob.core.windows.net/noteattachment/CBC-Local-Plan-CBC-Space-Study---evidence-base-EBC%202.18%20CBC%20Space%20Study.pdf) |
| Doncaster Council | Nov 2019 | GIA, bedroom and storage | 9% met all criteria (23 of 246 dwellings); 58% met bedroom criteria; 82% met GIA criteria | [SDEB25 - Housing Design Standards Policy Evidence Paper.pdf (windows.net)](https://dmbcwebstolive01.blob.core.windows.net/media/Default/Planning/Documents/Local%20Plan/Submission/Other%20Docs/SDEB25%20-%20Housing%20Design%20Standards%20Policy%20Evidence%20Paper.pdf) |
| Portsmouth Council | July 2021 | GIA and bedroom | 78% (269 of 345 units) met GIA and bedroom criteria; larger properties more likely to meet criteria | [Space\_Standards\_Background\_Paper\_July\_2021\_compressed.pdf (portsmouth.gov.uk)](https://portsmouth.gov.uk/wp-content/uploads/2021/09/Space_Standards_Background_Paper_July_2021_compressed.pdf) |
| Gateshead Council | Feb 2019 | GIA | 50% (208 of 416 units) | [newcastle\_upon\_tyne\_gateshead\_supplementary\_-\_space\_standards.pdf](https://www.gateshead.gov.uk/media/12075/Gateshead-and-Newcastle-upon-Tyne-Compliance-with-NDSS-targets-and-implementation-of-the-standard/pdf/newcastle_upon_tyne_gateshead_supplementary_-_space_standards.pdf?m=636872982614730000) |
| Milton Keynes Council | Aug 2017 | GIA and bedroom | 49% (125 of 256 units) met GIA; 54% met bedroom floorspace; 84% met bedroom width | [Microsoft Word - NDSS Assessment - Report on Findings v0.3 (milton-keynes.gov.uk)](https://www.milton-keynes.gov.uk/sites/default/files/2022-01/Nationally%20Described%20Space%20Standards%20Study%20%28August%202017%29%20MKHOU002.pdf) |

1. <https://www.gov.uk/guidance/housing-optional-technical-standards> [↑](#footnote-ref-1)
2. [Code of measuring practice: definitions for rating purposes - GOV.UK (www.gov.uk)](https://www.gov.uk/government/publications/measuring-practice-for-voa-property-valuations/code-of-measuring-practice-definitions-for-rating-purposes) [↑](#footnote-ref-2)
3. The exception being the inclusion of dwellings proposed within 21/00571/FUL (pending decision), included to ensure sampling inclusive of a very large development (300 dwellings). [↑](#footnote-ref-3)
4. Assuming average of 559 dwellings per annum based on net dwellings completed in 2019/20, 2020/21 and 2021/22 – CDC Authority’s Monitoring Report 1st April 2021 – 31st March 2022 refers. [↑](#footnote-ref-4)
5. Housing Standards Review: Final Implementation Impact Assessment, Department for Communities and Local Government, March 2015 [↑](#footnote-ref-5)
6. [Standards\_by\_Programme\_chart\_2018-19.pdf (publishing.service.gov.uk)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718827/Standards_by_Programme_chart_2018-19.pdf) [↑](#footnote-ref-6)
7. [Raising accessibility standards for new homes: summary of consultation responses and government response - GOV.UK (www.gov.uk)](https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response) [↑](#footnote-ref-7)