Ref

South Gloucestershire Policies Sites & Places DPD

Housing Standards

November 2015

South Gloucestershire Council

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1. Introduction

1.0 In March 2015 the Government introduced optional Nationally Described Space and accessibility standards through the Housing Standards Review (see references for link). The purpose of the paper is therefore to provide supporting information and evidence for the inclusion of the Nationally Described Space Standard and the optional requirements for Accessibility M4 (2) and Wheelchair user dwellings M4 (3) in the South Gloucestershire Local Plan (Policies, Sites & Places Document) – revised Policy PSP38, previously consulted on in the Proposed Submission PSP Plan (March 15). The HSR sets out the minimum gross internal floor areas for different dwelling types. These are repeated at tables 2 & 3 of this paper. Views are therefore invited on a proposed new Local Plan policy and supporting text (italics) below, and evidence set out in this paper. Please use the response form [LINK].

Proposed Policy

POLICY PSP38 – INTERNAL SPACE AND ACCESSIBILITY STANDARDS FOR ~~AFFORDABLE~~ NEW DWELLINGS
New market housing shall be consistent with the nationally described (minimum internal) space standards and accessibility standard – M4(2). **Affordable Housing provided in accordance with Policies CS18 & 19 of the Core Strategy (as adopted) shall be consistent with the nationally described (minimum internal) space standards, accessibility standard – M4(2) and a percentage shall also accord with wheelchair standard – M4(3).** **M4 (2) & M4 (3) accessibility standards will only be required where step free access can be achieved.**

In March 2015 the Government introduced optional Nationally Described Space and accessibility standards through the Housing Standards Review. The Council's Sustainable Community Strategy promotes suitable housing and healthy lifestyles. Core Strategy objectives also promote high quality design and health and well-being objectives. The quality of housing has significant implications for the health and wellbeing of people. Pressures to provide housing and to intensify uses in the urban areas could potentially lead to an erosion of space standards with long-term consequences for health & wellbeing. In order to underpin good practice in the sector, the policy therefore adopts the new optional Nationally Described Space and accessibility standards.

To allow the sector to adapt, the provisions of the policy will become applicable on all new planning permissions as of 6 months of adoption of the policy. NDS standards will also be required on affordable housing for where reserved matters are required from 6 months of adoption of the policy. NDS standards will be required for market and affordable housing as of 1 year of adoption of the policy on Reserved Matters applications pursuant to an extant Outline Planning Permission.

*Level access may not be possible in all circumstances, i.e. particularly where a site or plot may be on a slope, be subject to flooding or not require lift access. Approved Document M refers to a **steeply sloping plot** as one where the gradient exceeds 1:15. M4 (1) Visitable standard accepts that it may not be possible to achieve a step-free*

access in such an instance (and permits a stepped approach). Therefore where the finished site and or plot levels and approach from relevant parking exceed 1:15 gradient, the plot is subject to flooding or lift access is not required (in the case of flatted development up to 4 storey) M4(2) & M4(3) accessibility standards will not be required.

X% M4(3)a wheelchair adaptable and M4(3)b wheelchair accessible dwellings (as a % of the affordable housing) will also be required.

The Council also does not wish to prevent truly innovative housing. Where it can therefore be demonstrated that a dwelling will provide high levels of amenity through for example innovative methods of storage, high levels of daylight, immediate access to outdoor private space and high quality specification, the Council may make exception and permit dwellings below the prescribed space standards.

1.1 Adams Integra were instructed by the Council to assess the viability impact of adopting the space and accessibility standards for both affordable and market housing. This assessment follows the original CIL viability assessment report dated April 2014 which underwent public consultation in May-June 2014. A number of issues arose out of the consultation, including the fact that the housing mixes were weighted towards larger house types. Revised housing mixes were drawn up and these were published by the Council on 23rd October 2014, in advance of the CIL examination of 10th December 2014. The revised housing mixes were accepted as part of the examination outcome, leading to the adoption of the proposed CIL rates by the Council. Following adoption of CIL Adams Integra were then instructed to assess the viability impact of the Draft Policy Sites and Places DPD (April 2015), which underwent public consultation in June-July 2015. The basis of this exercise is similar to the April 2015 report, in that land values per hectare have been assessed, arising out of different development scenarios, these being the same as the earlier report. Appendix 1 shows assumed size of units for the CIL, PSP (April 15) and PSP (Nov 15) reports.

1.2 Stuart Larkin and Associates Ltd were instructed by Adams Integra and the Council to assess the need to adopt the space and accessibility standards.

2. Background

2.0 The Housing Standards Review commenced in 2013, as part of the cutting red tape agenda, to look at establishing a common set of housing standards that local authorities could adopt within their planning policy framework. This was undertaken to reduce the wide variety of different housing standards being sought by local authorities for both market and affordable housing, which itself increased development costs due to the different requirements. In March 2015 the Government announced new building regulations related to access, waste, security, water & energy, plus additional higher optional standards with regard space, access & water. Optional elements can only be adopted if the standards have been included in Local Plans via public inquiry.

2.1 The NPPF paragraph 174 states that Councils should assess the likely cumulative impact of their policies and standards upon development in the Council's area. These policies and standards should not put the implementation of the plan at risk. In this instance, Adams Integra has assessed the wider implications of the PSPDPD in its report dated April 2015 and has now considered the additional impact of the NDSS standards.

2.2 The NPPG requires that Local Planning Authorities wishing to adopt the optional technical standards need to consider the provisions are set out in para 020 for space standards, and para 007 for access and wheelchair Standards.

NPPG para 020

How should local planning authorities establish a need for internal space standards?

Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. 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.

2.3 With regard to access standards the NPPF requires local planning authorities to have a clear understanding of housing needs in their area, including those for people with specific housing needs. The NPPG para 007 states that:

What evidence should local planning authorities use to demonstrate a need to set higher accessibility, adaptability and wheelchair housing standards?

Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and / or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take 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.
- the overall impact on viability.

2.4 It has been put to the Council that the NDSS can only be applied in full across all tenures. The Council refutes this point of view. The HSR technical document simply states that the new space standards are suitable to be applied across tenures. There is no evidence to suggest that the NDSS cannot be applied as Councils see fit (supported by appropriate evidence).

3. Health, Wellbeing & Historic context

3.0 There are various ways in which the amount of space in a house may impact on health, however, the relationship is complex. There is not a simple cause-effect relationship between the space available and the degree of health of its occupants.

3.1 Space in a home can be characterised in terms of 'population density' and 'crowding'. Population density can be objectively defined as the number of persons per unit floor area or per room. Crowding is a subjective definition, encompassing social and psychological elements, which are dependent on cultural, social and demographic factors together with perceived feelings of control over the situation.

3.2 Many of the health effects related to space and crowding are difficult to disentangle from the effects of other housing-related and socio-economic factors. Sometimes the interpretation of evidence is open to debate, however several studies provide strong evidence of an association.

3.3 Overcrowding may have both direct and indirect effects on health. For example, a lack of space may directly lead to poor educational attainment because a child has no space for homework and also indirectly lead to the same conclusion because the child is regularly absent from school through illness exacerbated by overcrowded living conditions

3.4 It would be almost impossible to conduct an epidemiological study which sufficiently controlled for all other variables to provide evidence of a direct association between better health and an objective measure of space, in a home environment. The direct health effects which have been observed are often described in terms of population density, generally persons per room, rather than a space standard.

Health Effects - Mental Health

3.5 Overcrowding can relate to outcomes in health, education, child development and growth. Evidence from the Scottish Health, Housing and Regeneration (SHARP) project (University of Glasgow 2005) found an association between overcrowding and mental health. The study investigated residents views about houses provided under a regeneration programme. It concluded that having 'more space' was a distinct benefit for many residents who reported less stress and fewer family fights, particularly in families with children. It was particularly important that people had space where they could find privacy and spend time on their own or with their peers away from other family members. This was associated with less stress within the family.

3.6 A further longitudinal study was also carried out to investigate the impacts of being rehoused on the health and well-being of tenants moving into new-build socially rented housing (Kearns et al 2008). Mental health was measured in terms of vitality, social functioning and emotional health. Gains in the suitability of dwelling space (number and size of rooms) were associated with better outcomes on all mental health measurements but especially vitality. The feeling of having energy to do things in life is supported by having the right amount of space at home for one's needs. Twice as many people who gained space saw an improvement in their vitality score than those whose space stayed the same or worsened. Gaining in space terms has consistently positive effects upon all mental health dimensions.

3.7 A clear correlation has also been found between housing conditions during childhood and performance at school (Goux and Maurin 2003). Children who grow

up in a home with at least two children per bedroom are both held back and drop out of school much more often than other children. Even after controlling for other factors such as income, children who grow up sharing a room fall behind at school much more often than other children. Analysis of this data also suggests a cause and effect link between housing conditions and academic failure. Altogether, these findings indicate that public policy favouring access to larger dwellings could have a substantial effect on educational inequalities.

3.8 Another study looked at the association between residential density and parent-child speech. It found that parents in crowded homes speak in less complex, sophisticated ways and are less verbally responsive to their children when compared with parents in uncrowded homes. This relationship holds true when statistically controlled for socioeconomic factors. These findings help to demonstrate a link between residential crowding and delayed cognitive development (Evans et al 1999).

3.9 Data from a longitudinal study suggests that in the short term overcrowding may not have a significant effect on mental health, however when this continues for 6 months or longer there is a significant increase in the levels of psychological stress (Evans 2003 and CLG 2008). This is important when considering that residents in affordable and social housing will be less able to choose under-occupancy as a means of alleviating overcrowding and are therefore likely to remain in 'at capacity' properties for the long term.

3.10 The South Gloucestershire Council Partnership Strategy for children and young people lists its priorities as; tackling child poverty through improving living standards, preventing poor children becoming poor adults through raising their educational attainment, and ensuring that children and young people have positive educational outcomes. The adoption of policies to provide additional space in houses could have long term impacts on development and hence educational attainment and impact upon this stated priority.

Health Effects – Physical Health

3.11 Overcrowding has been linked to an increase in infectious illnesses. Many such illnesses are spread through airborne droplet infection from person to person in close proximity. The relationship between tuberculosis and crowded housing conditions is well established. Studies have also demonstrated an association between high population density and the occurrence of chickenpox, the common cold and meningitis. Several independent studies link meningitis with overcrowding in terms of persons per room. (ODPM 2004)

3.12 Evidence has been produced of a strong association between living in a crowded house with the prevalence of *Helicobacter (H. pylori)* infection, which is a possible cause of gastritis, peptic ulcers and stomach cancer, even when controlling for socio-economic class. There is also a link with reduced rates of growth in children. (Patel et al 1994)

3.13 Other studies have provided evidence of a relationship between overcrowding and an increased mortality rate. In particular, Fox and Goldblatt (1982) found that overcrowding had a strong independent association with female mortality and the higher the level of overcrowding, the greater the risk of mortality.

3.14 Several studies have demonstrated an association between childhood overcrowding and meningitis. (ODPM 2004) Meningitis can be life threatening. Long-term effects of the disease include deafness, blindness and behavioural

problems. There is also a strong association between tuberculosis (TB) and overcrowding (Elender 1998). TB can lead to serious medical problems and is sometimes fatal.

Space Standards - Historic Context

3.15 Space standards have thus been part of post war affordable housing delivery since the introduction of Parker Morris in the 1960's – Homes for Today and Tomorrow. These standards were based on functionality. Prior to that, good sized housing was built to replace slum clearance and in so doing to accommodate internal facilities and bathrooms. Minimum standards were based on maximum densities and a minimum space standard for a 3 bed house was set out in 1919 by the Tudor Walters committee. Space standards have remained in different guises since, most recently with the HCA's Design and Quality Standards.

3.16 With regard market housing, during the last 100 years, this has been largely been left to meet demand despite calls through the years for sets of minimum standards. Depending on demand and supply and of course cost versus ability to pay has led to various periods of smaller house types proposed during housing market cycles. For instance Small Micro flats emerge during high value inflation periods and drives a trend toward high density housing (e.g. PPG3), while in leaner periods of the cycle family housing virtually built to order becomes the norm as was saw in the most recent recession (2008-12/13). Internal house sizes in the private sector have been reducing since the 1960s and the RIBA and others have long lobbied for better design, day light standards and sized housing, and it is well recorded that England has some of the smallest housing in Europe based on bedrooms and floors areas. There are no nationally required space standards for market housing although many local authorities and the Greater London Authority (GLA) have introduced space standards to address some of the long term issues through planning SPG's, SPD's and technical advice notes etc.

3.17 Specifically, there has been a number of research papers outlining the issues around space and the need for an emerging set of standards within England. Notably the RIBA issued a paper in September 2011, "The Case for Space" outlined a range of issues.

3.18 One of the key observations is that the RIBA found that new homes are the smallest in Western Europe, in the UK the average new home is 76m2 while in Ireland it is 87.7m (15% bigger), in the Netherlands with similar land pressures it is 115m2 (53% bigger) while in Denmark is was 137m2 (80% bigger).

3.19 In addition, the average home in the UK is 85m2 (16.3m2 per room) while the average new build home is 76m2 (15.8m2 per room) suggesting that the size of new homes is shrinking.

3.20 The RIBA also compared space standards between a range of leading market house builders in England and concluded the following:

- That the average new home in England was only 92% of the recommended minimum size (GLA space standards not NDSS).
- The average 1 bed home was 46m2 which is 4m2 below the recommended standard for single storey, GLA and NDSS (apartments). The most common 1 bed was 45m2.
- The average 3 bed was 88m2, 8m2 short of the GLA space standards

recommended for a 5 person 2 storey home (and 5m2 short of the equivalent NDSS). This covered a range of smaller and larger three bed homes and the most common three bedrooms home was 74m2.

3.21 UCL, commissioned by CABE, produced a housing standards research paper "Space Standards: the Benefits", (April 2010) including a summary of the development of space standards and housing standards generally since the 19th Century - cumulating with the Parker Morris standards to suit post War lifestyles. This included assumptions of how a family used the house, developed within a house and the need for suitable storage (applicable with the 1950-1960's lifestyles as they were developing then).

3.22 Looking at the current day need for space standards the UCL CABE report covered the benefits of adopting space standards today. Focussed around general health and wellbeing, it considered family life and the needs of children with particular consideration of the capabilities of homes to accommodate furniture needs, (computers, TV, appliances in the kitchen, home working) and impacts on productivity and scope for adaptability over the life of the occupiers. It also considered market benefits relating to shaping the expectation and knowledge of buyers and reducing the risk of market failure by reducing market demand at certain times in the market cycle.

3.23 In 2009 the CABE, English Partnerships report, "Space in new Homes: what do residents think", found that, "the absence of any national minimum space standards, or specification for minimum floor space for privately developed homes in England has resulted in what CABE would consider to be a growth in properties with inadequate space" (RIBA comment 2009).

3.24 More recently a MORI survey of April 2013 commissioned by the RIBA found that, high energy bills (49%), lack of space (32%) and lack of natural light are the most cited causes of dissatisfaction within the home. Lack of space is reported as the main reason for making changes or considering moving home for people in homes built less than 10 years ago. The idea of a minimum standards being introduced for space, energy and security is viewed favourably by respondents and the majority suggest it would positively affect their choice when choosing a home.

4. Timing

4.0 NPPG (para 020) requires that Local Authorities consider timing of the implementation of new space and accessibility standards stating that, '*there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.'*

4.1 The NPPG appears clear that new space standards should not be applied to sites already acquired by developers ahead of adoption of the policy. However, the LPA is not party to land deals. The existence of planning permission (outline or full) is also not always evidence of land having been acquired by a developer, i.e. where a grant of planning permission is made to a landowner prior to putting the site to the market.

4.2 South Gloucestershire also has a number of large strategic development sites that will be developed out over many years. Land parcels are often sold by the master developer to other developers during the build out. Such long construction periods are subject to variables in the market and build costs. Application of NDSS to these sites (subject to an appropriate notification period) may therefore be wholly

viable.

4.3 In the case of Affordable Housing, similar space standards have been applied for many years as a requirement of grant funding by the HCA and previously the Housing Corporation. SGC required similar standards delivered through planning obligations without public subsidy. The implications of applying the new NDSS is therefore not considered overly problematic in viability terms (see text and conclusions below).

4.4 In the case of market housing larger house types are regularly provided in excess of the NDSS (see text and conclusions below). Again therefore the implications for the land acquisition process and general viability is not considered overly problematic.

4.5 The Council therefore proposes to provide a three stage approach to implementation as follows:

The provisions of the policy will become applicable on all new planning permissions as of 6 months of adoption of the policy. NDS standards will also be required on affordable housing within reserved matters applications from 6 months of adoption of the policy. NDS standards will be required on all housing as of 1 year of adoption of the policy on Reserved Matters applications pursuant to an extant Outline Planning Permission.

5. Accessibility Standards

5.0 The new Approved [Building Regulation] Document Part M has now been split into two separate volumes. Volume one (see HSR link in references) relates to new dwellings only. Within this new document three categories of access and use now exist. The categories are as follows;

M4(1) (Category 1) – Visitable Dwellings

M4(2) (Category 2) – Accessible and adaptable dwellings

M4(3) (Category 3) – Wheelchair user dwellings

Categories M4(2) and M4(3) are known as optional requirements and are the additional standards which can be imposed by planning though the local plan.

5.1 M4(2) (Category 2) – Accessible and adaptable dwellings is the second tier after the basic requirements highlighted in M4(1) which is a similar standard set out in the old Part M. This category thus states that;

M4(1), '*Reasonable provision must be made for people to:*
(a) Gain access to and
(b) Use the dwelling and its facilities'

M4(2), '*The provision made must be sufficient to:*
a) Meet the needs of occupants with differing needs including some older or disabled people and
b) To allow adaptation of the dwelling to meet the changing needs of occupants over time.

The addition of provisions under M4(2) to those under M4(1) is what elevates compliance to M4(2).

5.2 The main external changes to a dwelling from M4(1) to M4(2) are;

- All external doors must have a level threshold
- Approach routes must have a minimum clear width of 900mm or 750mm at localised obstructions and have a gradient between 1:20 and 1.12
- Every gate way must have a 850mm clear opening, with a 300mm nib on the leading edge to allowing manoeuvring to reach the handle.
- Parking spaces within the private curtilage of the dwelling (but not a car port or garage) must include at least one standard parking bay that can be widened at a later date to 3.3m.
- Every principal entrance must have canopy/ porch area covering a minimum width of 900mm and depth of 1200mm.
- External doors must have a openable width of 850mm and have a 300mm nib on the leading edge (see diagram 2.2 ADM)

5.3 The main internal features include;

- Stairs must be a minimum width of 850mm to allow the future installation of a stair lift
- At least one bedroom must have a 750mm clear access zone from the foot of the bed and on both sides. Every other double bedroom will need a clear access zone on one side and the foot of the bed. Plans of furniture layouts in this instance will need to be provided to show compliance (See diagram 2.4 ADM).
- Walls, ducts and boxings on all WC, bathroom and we- rooms must be strong enough to support grab rails, shower seats and other adaptations which can take a load of 1.5kn/m3.
- A bathroom must be located on every floor which has a bedroom
- Ground floor WC must have a hidden drainage connection and be large enough to accommodate a shower (see diagram 2.6)
- Consumer units must be mounted at a height between 1350mm and 1450mm above floor level.
- Handles for windows unless on remote opening system must be located between 450mm and 1400mm above floor level.

5.4 Requirements in respect of M4(3) – Wheelchair user dwellings are set out in Section 3 of approved Document M. Where M4(3) dwellings are required these provisions replace M4(1) & (2). The Council has regularly sought a % of wheelchair accessible dwellings as part of the affordable housing requirement in recent years. The NPPG also stipulates that M4(3) cannot be required in respect of market dwellings.

5.5 LABC have also created a short video (link below) which highlights the main changes.
http://www.labc.co.uk/knowledge-hub/training/courses/2015-building-regulation-update-resources

5.6 Level access may not be possible in all circumstances, i.e. particularly where a site or plot may be on a slope, be subject to flooding or not require lift access. Approved Document M refers to a **steeply sloping plot** as one where the gradient exceeds 1:15. M4 (1) Visitable standard accepts that it may not be possible to achieve a step-free access in such an instance (and permits a stepped approach). Therefore it is proposed that where the finished site and or plot levels and approach from relevant parking exceed 1:15 gradient, the plot is subject to flooding or lift access is not required (in the case of flatted development up to 4 storey) M4(2) & M4(3) accessibility standards will not be required.

Need for adoption of M4(2) & M4(3) accessibility standards

5.8 Population statistics predict an increase in the proportion of elderly residents. The 2013 Joint Strategic Needs Assessment also details the predicted health needs of the elderly population, including mobility issues but not specifically wheelchair use. Appendix 8 of this document sets out more detail with regard national population statistics in respect of disabled households, visitable dwellings and an ageing population.

5.9 Vol 1 & 2 of the Strategic Housing Market Assessment (2015) provides evidence to support the West of England Joint Spatial Plan. Vol 1 has now been endorsed by the Planning Housing & Communities Board (PHCB) and is now available at https://www.jointplanningwofe.org.uk/consult.ti/JSPIO2015/consultationHome and Vol 2 is due to go before the PHCB in December 15. Details should be available shortly at http://www.westofenglandlep.co.uk/meetings/planning-housing-and-communities-board. The draft SHMA Vol 2, includes evidence and recommendations to deliver all new homes to Accessibility standards M4 (2) due to the aging population most of whom will remain in the family home. This is to overcome a shortfall in the current stock of usable dwellings requiring the minimum of adaptation for future disability and access issues. It also includes evidence to support the need for a target of at least 25% and ideally 50% or more specialist housing for older people to meet category M4(3) requirements.

5.10 The 2009 SHMA was assessed at a time when Lifetime Homes standards (similar to M4(2) standards) were being rolled out for all new affordable units and emerging for all market units. There is therefore no access needs data within that SHMA as this was assumed to be the emerging norm at the time.

5.11 Regarding Wheelchair needs some 18.4% of the housing register at the time had some form of disability health needs (not all requiring full wheelchair need). There was a net need forecast for 49 new units per annum. On the basis of the net need identified and delivery over the last three years of 282 pa this would equate to 17% of new units being Wheelchair standards. As a percentage of total demand identified at the time of 903 pa the need was 5.4% of the total net need (chpt 4 and 10 of the 2009 SHMA (WoE).

5.12 In addition, data from the Homes Choice Register shows that despite lettings to those with need for adapted homes (including Wheelchair Units) the number on the register as of 1st April each year has risen from 24 in 2011 to 47 in 2015. This suggests the need is creeping up over a period of time despite Lifetime Home delivery and a 5% wheelchair affordable homes objective on S106 sites within the SPD 2008.

5.13 Census data (see appendix 8) indicates that South Gloucestershire is fairly reflective of the national picture in terms of the spread of households with people with long-term health problems and disabilities. It is also fairly reflective in terms of the increase in the % of the population that are over 65 between 2017-2037. However, South Gloucestershire is forecast to see a greater % increase than the national average in terms of the over 85 group (135% compared with 118% nationally).

5.14 Thus, the % of wheelchair users is higher in the 60+ population (75%) with 46% being in the 75 and over population. Therefore the forecast growth in over 60's population, provides good reason for both accessible housing being provided to

allow for ease of use as householders get older and for adaptations to be made to remain in their own homes where possible and to allow for an increasing stock of homes that can be easily adapted to allow for those requiring wheelchair access to friends and families to be facilitated.

6.0 ***General Viability Assumptions***

6.1 The following methodology was utilised for the viability impact assessment of the NDSS standards.

6.2 Land values per hectare, arising out of different development scenarios, are calculated and compared to threshold land values. If the threshold land values are exceeded, then a scenario is said to be viable. The assumed threshold land values remain as in the earlier Adams Integra report of April 2015. Housing mixes were also published by the Council as part of the CIL exercise on 23rd October 2014, see paragraph 1.1 above. For this particular exercise, however, a range of floor area standards was considered.

6.3 For some house types, the NDSS show up to four different floor areas, depending upon the number of persons assumed for the unit. It was agreed with the Council therefore, that Adams Integra would test an upper and lower unit size from the range for this new assessment. Table 1 below sets out the floor areas for different house types that were assumed for the April 2015 report, along with those areas that have been assumed for the current study. It will be noted that the areas for the four and five bedroom market houses remain the same, since these are either at the upper end of the range, or exceed the upper end, as in the case of the five bed units.

Table 1: Assumed floor areas, compared to those from the April 2015 study.

	April 2015 report		Current study	
	Areas in sqm		Areas in sqm	
Unit type	Market	Affordable	Market and affordable	
			Smaller	Larger
1 bed flat	46	50	50	50
2 bed flat	60	61	61	70
2 bed house	71	79	70	79
3 bed house	80	93	84	102
4 bed house	115	106	115	115
5 bed house	160	n/a	160	160

6.4 Adams Integra updated some of the inputs to the land valuations, based upon new evidence, as follows:

Sales Values

6.5 Land Registry house price data for South Gloucestershire was used to assess price changes since the April 2015 report. The latest Land Registry data relates to August 2015 and is broken down between housetypes.

6.6 Appendix 2 is an extract of the Land Registry data for the period April 2015 to August 2015. This shows a rise of 4.4% across all housetypes. This price increase was therefore applied to the land valuations. This effectively also includes the affordable housing units, since their value is expressed as percentages of the open market value.

6.7 With regard to the different floor areas that have been assumed for the housetypes in this study, we believe that these differences are sufficient to warrant different sales values. We are, therefore, including, as Appendix 3, a table that shows the suggested sales values for the smaller and larger unit types.

Build Costs

6.8 The build costs assumed for the April 2015 report were:

Houses	£1,190 per sqm
Flats	£1,438 per sqm

6.9 For updates to the current study, the Housing Standards Review Consultation Impact Assessment of August 2013 and the more traditional source of the BCIS index were consulted. An extract from the BCIS index is attached as Appendix 5, where it will be seen that a cost increase of 0% was recorded between the second and third quarters of 2015.

6.10 The Housing Impact Assessment of August 2013 would appear to assume a range of housetypes and specifications, to which build costs have been applied. In addition it specifies additional costs for Lifetime Homes and the required wheelchair standard.

6.11 Given that the costs in the Impact Assessment are now over 2 years old, base build costs that stem from the April 2015 rates, as above have been assumed. In spite of the BCIS information, it is believed that developers would have experienced a rise in build costs between April and October 2015 and we have, therefore, assumed an increase of 2% over the earlier rates. Resultant rates would be:

Houses	£1,214 per sqm
Flats	£1,467 per sqm

6.12 These rates have been applied to the scenarios involving the smaller units from the NDSS range, as in Table 1 above. For the larger units in the NDSS range, the view has been taken that the additional floor area per unit will cost less to build per square metre than the original floor area, on the basis that the expensive items of kitchen, bathrooms, boiler etc have been allowed for in the base cost. 70% of the base cost for the additional floor area has therefore been adopted.

6.13 For example, a smaller 2 bedroom house would cost 71sqm x £1,214 = £86,194.
Larger unit is 79 sqm. Assume 8 sqm @ £850 = £ 6,800

Total cost =	£92,994

Equates to £1,177 per sqm.

A smaller 3 bed house would cost 80sqm x £1,214 =	£97,120
Larger unit is 102 sqm. Assume 22sqm @ £850 =	£18,700
	£115,820

Equates to £1,135 per sqm.

A similar methodology applied to the larger flats results in a cost of £1,404 per sqm.

6.14 As a result, the following base build costs for the larger units in the NDSS range have been adopted:

Houses	£1,150 per sqm
Flats	£1,404 per sqm

6.15 In addition to the above base costs the following costs, arising from the Housing Standards Impact Assessment have been allowed:

Lifetime Homes, from table 19 of the Impact Assessment	£1,100 per unit
Wheelchair access to 5% of units	£14,000 per unit.

(note: Lifetime Homes is similar to M4(2) requirements)

6.16 Other costs arising from the PSPDPD, such as additional fees and the cost of balconies to flats, are also included in the current study.

6.17 These revised sales values and build costs are therefore used to evaluate the impacts of the enhanced accessibility and space standards.

7.0 Market & Affordable Dwellings

Need (market dwellings)

7.1 The HSR clearly concluded that there was a case for minimum internal space standards and sets the standards for dwelling typologies accordingly. It is argued therefore that should evidence suggest that there is any persistent delivery of dwelling types below the NDSS then this is indicative of a 'need' to apply the standards. Appendix 5 compares NDSS standards with market and affordable dwellings delivered in recent years in South Gloucestershire where schedules of data are available. This shows that the smallest market 2 bed and occasionally 3 bed homes are often below the minimum NDSS. 4 & 5 bed units are generally provided larger than the NDSS.

7.2 A forensic examination of housebuilder product is not considered necessary as developers usually have a selection of units within each typology at varying sizes for marketing and design reasons. These selections usually include unit types above the minimum NDSS. The Council also has not historically, does not currently and has no intention of prescribing required mixes of units in terms of particular mkt dwelling types (2b 4p, 3b 5p etc). The impact of adoption of the NDSS will therefore be to ensure that the smallest mkt products are brought up to the minimum NDSS in each dwelling type.

7.3 There are also significant differences between the levels of occupancy in the

owner occupied market and the private rented market which forms some 19% of the market nationally (see table 4 below - EHS 2013/14). Locally the level of private lettings is 14.7% (census 2011) which is larger than the social rented sector. It would therefore also seem sensible to underpin standards in the growing private rented sector by adoption of the NDSS.

7.4 The SHMA Vol II, as previously stated, will include recommendations to deliver all new homes to Accessibility standards M4 (2) due to the aging population most of whom will remain in the family home. This is to overcome a shortfall in the current stock of usable dwellings requiring the minimum of adaptation for future disability and access issues. To deliver these standards (similar to Lifetime homes) will require a larger internal layout which would equate to the NDSS.

7.5 Furthermore research carried out by CABE in 2010 (Space Standards : the benefits UCL 2010) recognised the benefits of larger housing across all sectors to delivering larger more flexible homes which can adapt to family and individual life changes to enable household to remain in situ rather than have to move to accommodate a life change. This flexibility with size coupled with the access standards enable households to stay in familiar environments as long as they wish to do so, so arguably improving sustainability and wellbeing.

Viability (market + affordable housing)

7.8 The viability outcomes of this exercise are shown in the table attached at Appendix 6A. This compares land values per hectare for the different development scenarios, at the different value points, and between the different floor areas. It can be seen that column 6 of the table repeats the outcomes from the April 2015 study; this is just for comparison purposes. Column 7 shows land values per hectare, arising from the smaller unit sizes in the NDSS range, while column 8 shows outcomes from the larger unit sizes. The column 7 and 8 outcomes incorporate the relevant sales values and build costs, as discussed above. In connection with the outcomes, we would make the following points:

1. The overall pattern of viability is similar between the April 2015 outcomes and those relating to the different NDSS floor areas. This is illustrated by the three “traffic light” tables at the bottom of Appendix 6A.

2. As was seen in April 2015, the scenarios that show the greatest pressure on viability are the highest density in low value locations.

3. Outcomes for the smaller NDSS unit sizes (column 7) show a marginal improvement over outcomes at April 2015. This could be due to the improved sales figures, since the smaller NDSS floor areas are similar to those assumed in April 2015.

4. The average land values for the larger NDSS scenarios are marginally higher than those for the smaller NDSS scenarios, but these should be considered in conjunction with comments below under 7.10-7.12.

5. When we compare the outcomes to the Threshold Land Values per hectare, we see that patterns of viability are similar to those from April 2015. This implies that the application of the NDSS standards does not result in more scenarios being unviable against higher value thresholds.

Supply & Starter Homes

Supply

7.9 NPPG para 020 requires LPAs to consider the potential impact on supply and starter homes of the NDSS. Hence, regarding the supply issue, if the Council adopts the unit sizes at the lower end of the NDSS range, it can be seen from appendix 1 that these sizes are not significantly different from those accepted for the CIL examination. The viability impact should not, therefore, be great and we would not expect any significant supply issues. If, however, the larger NDSS sizes are applied, (not proposed) then there could be a potential impact, depending on a number of factors:

Coverage

7.10 As part of the CIL examination process, the Council responded to representations in respect of housing mixes, by publishing revised mixes on 23rd October 2014. These mixes also showed the coverage, or built floor area, per hectare that was being assumed. For a density of 35dph this coverage was around 3,700 sqm per hectare, while for a density of 50dph, this coverage was about 4,000 sqm per hectare. These coverage levels were accepted as part of the CIL examination.

7.11 With reference to the table of land value outcomes at Appendix 6B, the results for the smaller and larger NDSS units are shown in columns 7 and 8 respectively. The coverage levels for the smaller unit outcomes are similar to those accepted for the CIL examination. The coverage levels, produced by the larger units, however, are in excess of the CIL levels, if the same mixes are assumed. For example, the coverage for the 50dph density, with the same mix, is around 4,500 sqm per hectare. Whilst this level of coverage might be achievable in certain circumstances, with a higher proportion of flats, we do not believe that it can be realistically assumed in all circumstances.

7.12 As part of Appendix 6 we have, therefore, added a second table, being Appendix 6B, showing the impact of higher NDSS standards upon unit numbers, if coverage is maintained at previously accepted levels. The table illustrates the position at 50dph and at value points 2 and 3, these being the more sensitive viability scenarios. In relation to this, we would make the following comments:

1. The coverage per hectare, arising from the larger NDSS units and previously accepted mixes, is shown in column 5.

2. The number of units, resulting from adopting the previously accepted coverage, are shown at column 6. The new coverage level is at column 7.

3. Land value outcomes per hectare are shown at columns 8 and 9.

4. We have assumed that small sites can include a smaller range of house types than larger sites. In this instance, the 9 and 14 unit sites retain the same overall number of units, but the mixes include a higher proportion of 2 bedroom houses.

5. The larger sites need a more balanced mix of units and, in order to also meet

the coverage requirement, a worse-case scenario would result in a reduction in the number of units. At Appendix 6B, for example, this can be seen in column 6, where a previous 35 unit site has dropped to 32 units (9%), a 75 unit site is now 65 units (13%) and a 300 unit site is now 260 units (13%).

6. On the basis of equalising the coverage, it will be seen from column 9 of Appendix 6A that viability theoretically suffers with the larger units in the NDSS range.

7. In practice, however, developers will not be required or of their own accord apply the largest NDSS to all dwelling types and would recoup units if necessary through different design means. For example they might substitute the largest 4 & 5 dwellings for slightly smaller units and add rooms in the roof or over garages etc, while also ensuring the maximum efficiency of site layouts.

7.15 Evidence from the housebuilder data at Appendix 5 would suggest that the unit type falling most consistently below NDSS standards is the 2 bedroom unit, where the smaller sizes are likely to relate to flats. The smallest 2 bedroom flats in the market are, typically, 57 to 59 sqm, whereas the NDSS standard would require a minimum of 61 sqm. It should be noted, however, that larger 2 bed units are also being provided at sizes that would satisfy the NDSS standards.

7.16 In order to assess the potential impact to delivery on site, we can consider a scenario of, say 75 units at 50dph with a developable area of 1.5 hectares, where our suggested mixes would assume 13no. 2 bedroom flats. If we were to assume that all these flats were undersized by, say, 3sqm, then a further 39sqm would need to be accommodated within the developable site area. It is suggested that this should be possible via means above.

Starter Homes

7.17 With respect to starter homes this delivery could be in the form of open market sales units as at present, or it could be in the context of the Government's initiative to provide starter homes at discounted sales prices. As part of this initiative, it is understood that developers may be able to replace affordable housing units with starter homes at 80% of open market value up to a value of £250k.

7.18 In connection with the open market option, and in the specific context of South Gloucestershire, we believe that buyers of starter homes will be sensitive to price and that there could, therefore, be resistance to higher prices that might be implied by the larger units within the NDSS range, particularly in lower value locations. We have seen above, however, that the most sensitive units to the size changes are likely to be 2 bed flats, where an additional area of around 3 sqm would be required to bring them up to the minimum NDSS size, or some 5% of the floor area. It is however, not considered that this additional area is large enough to warrant a significant rise in sales value at the lower end of the NDSS range, beyond the value that would be discernible when compared with other such factors as location, outlook, specification and availability of parking.

7.19 With regard to the Government's starter homes initiative, we believe that the relevant issues are:

1. The size and type of starter accommodation is to be left to individual authorities.

2. Units would be sold at a discount to market value of 20%. No sale at full market value could be made for 5 years.

3. In return for the discounted sale, developers would not have to provide rented affordable housing.

4. There would be a price ceiling of £250,000 per unit. This would cover 1 to 3 bed units in the lowest value locations within South Gloucestershire.

7.20 It is considered that this initiative is likely to benefit the delivery of starter homes in South Gloucestershire, at floor areas within the NDSS range, for the following reasons:

1. The reduced % rented affordable housing will be seen as a sales benefit by developers, even if there is an element of intermediate affordable.

2. The discount to market value of affordable housing would typically be up to 50%. A discount of 20% (80% omv) will, therefore, produce higher revenue, depending upon the proportion of full market units that is included in the scheme.

3. The Government states that these starter homes should be on redundant commercial or industrial sites. This would suggest that commercial or industrial is no longer a viable use and would result in a lower threshold land value needing to be achieved.

7.21 It is not therefore considered that the application of NDSS will have any substantive impact on supply of starter homes (of either type) in South Gloucestershire.

8.0 Affordable Housing (only)

Need

8.1 The South Gloucestershire Local Plan 2006-2011 (SGLP) contained Policy H6, which set out the Council's requirement for affordable housing contributions through planning obligations, until superseded by Policy CS18 of the Core Strategy (adopted December 2013).

8.2 An Affordable Housing SPD was adopted in 2008 in relation to Policy H6, to be replaced by the Affordable Housing and Extra Care Housing SPD, adopted in May 2014, relating to policies CS18 Affordable Housing, CS19 Rural Exception Schemes and CS20 Extra Care Housing.

8.3 The SPD of 2008 contained a table of space standards to be used for new build affordable housing developments (Appendix 4). The SPD of 2014 made reference to the HCA Design and Quality Standards (Para 5.1).

8.4 The National Described Space Standard (NDSS) was issued in March 2015 to supersede local standards and those contained within the HCA Design and Quality Standards.

8.5 The different space standards are contained below in Table 2. The difference in sizes between the NDDS and the SPD 2008 and HCA Addendum 2015 is shown in Table 3.

Table 2. The Nationally Described Space Standard 2015 with HCA Addendum 2015-18 and AH SPD 2008 unit sizes (m^2).

No.beds	No. persons	1 storey			2 storey			3 storey		
		NDSS	HCA '14	SPD	NDSS	HCA '14	SPD	NDSS	HCA '14	SPD
1	1p	39	38							
	2p	50	47	46	58					
2	3p	61	60	62	70	68				
	4p	70	69	67	79	77	75			
3	4p	74	73		84	81		90	86	
	5p	86	84		93	90	85	99	95	
	6p	95	93		102	99	95	108	104	100
4	5p	90	88		97	94		103	99	
	6p	99	97		106	103	100	112	108	105
	7p	108	106		115	112	108	121	117	115
	8p	117	115		124	121		130	126	
5	6p	103	101		110	107		116	112	
	7p	112	110		119	121		125	121	
	8p	121	119		128	125		134	130	
6	7p	116			123	120		129	125	
	8p	125			132	129		138	134	

Note: SPD 2008 for larger units undefined for comparison so omitted.

Table 3 - Difference between NDSS and HCA 15 and SPD 08 space standards and averages

No.beds	No. persons	1 storey			2 storey			3 storey		
		NDSS	HCA '14	SPD	NDSS	HCA '14	SPD	NDSS	HCA '14	SPD
1	1p	39	-1							
	2p	50	-3	-4	58					
2	3p	61	-1	1	70	-2				
	4p	70	-1	-3	79	-2	-4			
3	4p	74	-1		84	-3		90	-4	
	5p	86	-2		93	-3	-8	99	-4	
	6p	95	-2		102	-3	-7	108	-4	-8
4	5p	90	-2		97	-3		103	-4	
	6p	99	-2		106	-3	-6	112	-4	-7
	7p	108	-2		115	-3	-7	121	-4	-6
	8p	117	-2		124	-3		130	-4	
5	6p	103	-2		110	-3		116	-4	
	7p	112	-2		119	2		125	-4	
	8p	121	-2		128	-3		134	-4	
6	7p	116			123	-3		129	-4	
	8p	125			132	-3		138	-4	
Average			**-1.8**	**-2.0**		**-2.5**	**-6.4**		**-4.0**	**-7.0**

Total Average from NDSS to HCA 2015	**-2.7**
Total Average from NDSS to SPD 2008	**-5.4**

8.6 In the Affordable Housing SPD 2008, South Gloucestershire Council identified the need for space standards, alongside those from the HCA, for all new build affordable housing. This was justified on the basis of providing sustainable affordable housing that provided homes of sufficient size to allow long term occupation by households who usually occupy at full occupancy.

English Housing Survey

8.7 Nationally, affordable housing is generally occupied at capacity or over capacity (overcrowded and awaiting larger homes) to a greater level than private rented and owner occupied sectors. Based on 3 years data (2011-12, 2012-13 and 2013-14) the English Housing Survey identifies a greater level of "at capacity" or overcrowding in the affordable sector than the private sector.

8.8 The English Housing Survey 2013/14 provides the following data:

Table 4

		all owner occupiers	**all private renters**	**social renters**
bedroom standard (2006 definition)[3]				
two or more below standard	over crowded	0.2	0.6	0.8
one below standard	over crowded	1.3	4.8	5.4
at standard	at capacity	13.3	43.9	55.5
one above standard	under occupied	35.5	35.9	28.3
two or more above standard	under occupied	49.7	14.8	10.0
all households		**100.0**	**100.0**	**100.0**
all households		**63.4**	**19.2**	**17.4**
	Under occupied	**85.2**	**50.7**	**38.3**
	At standard or over crowded	**14.8**	**49.3**	**61.7**

From Annex Table 2.7 EHS 2013-14

8.9 Levels of “at capacity” or overcrowding occupancy are highest in the affordable sector with 61.7% of all tenants occupying their property at ‘standard’ or ‘overcrowded’ as opposed to the Owner Occupied sector where this level of occupation runs at just 14.8% nationally.

8.10 Recent legislation introduced in 2012 by the *Welfare Reform Act*, relating to the reduced benefit entitlement for those under-occupying social housing, the “bedroom tax” will encourage further downsizing of households. This gives an incentive to fully occupy new and existing homes to avoid the loss of housing benefit (as applicable). This adds further pressure on space within households and the need to provide a good standard of house size for affordable housing occupants.

Size v per person occupancy.

8.11 Further evidence of greater occupation and hence the need for good sized homes on an ongoing basis is found in the “m^2 per person” statistics within the English Housing Survey.

8.12 Average floor area per household is highest for owner occupiers at 109m^2 while it is lower for private renters at 77m^2 then lowest in the social rented sector at 66m^2.

8.13 A similar, but less pronounced, pattern occurs for space per person with owner occupiers at 55m^2 per person, private renters at 39m^2 per person and social renters at 38m^2 per person.

8.14 This pattern is further emphasised with the usable floor area for different age groups (Age of head of household). The highest per person space is 119m^2 for owner occupiers in the 45-54 age range, 82m^2 for private renters in the 55-64 age range and 72m^2 per person in the Social Rented sector for those aged 45-54.

8.15 This suggests fuller occupation in the social rented sector in generally smaller overall sized units. However note should be taken that in the 45-54 age group that families with children will leave home around this age giving under occupation levels prior to any downsizing that might occur.

Property Size per household type.

8.16 Different households by tenure have different unit sizes. The average house size for a couple with dependent children for instance is 126.8m^2 while for the same family type in the private rented sector it is 86.6 m^2 and in the social rented sector it is 77.6 m^2. For older households with one person over 60 the figures reduce to 90.0m^2 for owner occupiers, 67.5m^2 for private renters and 55.5m^2 for social renters.

8.17 The average floor space per person for a couple with dependent children is 32.4m^2 per person for those in the owner occupied market; 23.3m^2 per person in the private rented market and 18.7m^2 per person in the social rented sector. For older households with one person over 60 the figures are 82m^2 per person for owner occupiers; 67.4m^2 per person for private renters and 54.9m^2 per person for social renters.

8.18 For those who are retired, possibly in under-occupied homes as well as specifically designed retirement housing, the average space per person is 68.8m^2 in the owner

occupied sector, 54.4m^2 in the private rented and 47.8m^2 in the social rented sector.

8.19 This is despite the affordable housing sector having had a series of minimum space standards and layouts over the years ranging from the Parker Morris standard in the post-war years to the standards within the Design and Quality standards of the HCA and more locally the South Gloucestershire 2008 SPD.

8.20 The conclusion of this evidence is that despite minimum standards being maintained for the affordable sector, the occupancy is higher per m^2 as homes are generally fully occupied at the point of allocation and remain so for longer.

8.21 There is therefore a need to ensure that sufficient space is allowed for households when they are developed in the AH sector.

Allocation of units - local occupancy levels.

8.22 Evidence from the Home Choice team at South Gloucestershire Council suggests that in general all allocations seek to maximise a dwelling's capacity. This is the policy of the Council when accepting bids through the Home Choice scheme. For example, a 3 bed 5 person houses will generally be allocated to a 4-5 person household in line with the space standards of the 2008 SPD. This household could comprise 1 adult and three children or two different sex teens, 2 adults and 3 children or 2 different sex teens or various other combinations to give full occupancy.

8.23 There are exceptions to this and these are 'flagged' on the housing register. Of 5,000 households on the Home Choice register as of 21st September 2015, 20 households were flagged as benefitting from being allocated a property larger than policy would normally dictate. It is usually due to an identified need such as live-in support, requiring an extra bedroom. These exceptions to the general rule of allocation at full capacity amount to 0.4% of the current housing register.

8.24 The HomeChoice team have analysed the last 9 quarters of letters via their bidding and allocation process. This accounts for 1873 letting of which 93% were at full occupation. There were another 3% where there appeared to be under occupation but these were all flatted where it is possible that a 2 single people shared a 2 bed flat or it was occupied by a downsizing older couple appropriate for their need. Therefore the local data suggests that 4% was potentially under occupied, possibly for good reason (care needs, social and mental health needs) but it is not feasible to identify to this level of detail.

8.25 Therefore, the safe assumption is that at least 93% - 96% of local lettings in the affordable sector were allocated and occupied at full occupancy in South Gloucestershire in line with the policy.

8.26 This local data illustrates the national picture that, full occupation is being maintained with the result that the space per person is likely to remain under pressure with little prospect of relief in the near future.

8.27 The level of occupation in the affordable housing sector for those with disability or wheelchair need is higher than that within the wider private sector and as such the building of access standards and a proportion to full wheelchair standards is an important provision for those qualifying for affordable housing.

8.28 It is argued therefore that higher occupancy and allocations policies provides the

justification for applying NDSS in the AH sector.

8.29 It has however been put in initial discussions with RSL partners that larger space standards for the Affordable Sector *only* (should that be proposed) will make the registered providers less competitive in terms of securing 100% affordable sites within the market. However, significant delivery in South Gloucestershire is via S106 sites, so the principal competition is within the HA sector not between the HA sector and 'standard' market developers, although this would be true on sites a HA may be seeking to provide on a 100% AH basis (although Affordable Housing is exempt CIL charges which may mitigate any such effects). HA's are of course also not obliged to provide 100% AH on sites they own and can provide a mix of market and AH on such sites. To be clear it is the Council's intention that NDSS and accessibility standards are applied to both sectors to maintain a level playing field.

8.30 The HSR effectively removes all existing local space standards, therefore without doubt if minimum space standards are not maintained for AH there will be pressure to reduce AH space standards detrimentally so as to maximise the saleable area of market housing.

Viability

8.31 For the purpose of this exercise, it has been assumed that affordable housing revenues will be at the same proportion of open market value, as they were in the April 2015 report. It follows, therefore, that these values will have risen for the development scenarios with the larger units from the NDSS range. It would need to be confirmed that such values still match any affordability criteria that the Council and/or registered providers might impose.

8.31 The application of NDSS to affordable housing only would impact upon viability to varying degrees, depending upon affordability criteria and levels of market value, against which affordable values might be assessed. In the above scenario, where affordable values maintain a proportion of market rates, then viability would be enhanced. On the other hand, if affordability dictated that affordable revenues should remain unchanged, as market values rise, then viability could be impacted by the likely rise in build cost of providing the larger units. In turn, this would have the effect of lowering the land value.

8.32 However, a recent Government statement (letter from DCLG, 9th Nov, http://offlinehbpl.hbpl.co.uk/NewsAttachments/RLP/Ministerial_Letter9_November_2015.pdf) encourages Councils to show flexibility in the provision of affordable housing, particularly regarding specific tenures, in order to minimise viability issues and maintain a supply of new homes.

9.0 Conclusions

9.1 NPPF para 7 states that one of the 3 tenets of sustainable development is to support strong, vibrant and *healthy* communities by providing a supply of housing required to meet the needs of present and future generations, para 17 states that planning always should seek to secure high quality design and a *good standard of amenity* for all existing of future occupants of land and *buildings.* SGC Sustainable Communities Strategy promotes healthy lifestyles and seeks to improve the condition of existing homes and enable the provision of housing that suits the needs of people who require care and support. Furthermore, SGC Core Strategy strategic objectives seek to improve health & wellbeing and provide a range of housing to meet the needs of the whole community. Policy CS17 – Housing Diversity also seeks homes that are suitable for the needs of older people, persons with disabilities

and those with other special needs…

9.2 As set out above, there is a strong body of evidence that demonstrates a correlation between poor housing and space standards, and lower quality of life with implications for health & wellbeing. Promoting well designed and adaptable homes is therefore a key part of the Council's commitment to improving the health & wellbeing of its communities.

9.3 The evidence with respect to South Gloucestershire shows that the Council has been seeking and achieving affordable housing of similar space standards to the NDSS, however within the market sector 2 bed dwellings (flats) in particular are regularly being provided below the minimum NDSS for this category of dwelling.

9.4 With regard to affordable housing, the evidence shows that it is much more likely to be fully occupied. In such circumstances good space standards are all the more important to maintaining health & wellbeing. Removal of minimum space standards in this sector would threaten these objectives and may inevitably lead to pressure to reduce space standards further so to maximise saleable (market) square feet. SGC would argue therefore that it is critical that NDSS space standards are applied to this sector.

9.5 With respect to market dwellings, the practical implementation of the policy will be to underpin the size of the smallest units in each type (1, 2 & 3 bed in particular), and thereby reduce the potential for sub-standard dwellings. As set out at para 7.2 the Council does not prescribe mixes or numbers of beds and people (3b 5p etc) other than Core Strategy policy 17 that promotes provision of a wide mix of dwellings (type and tenure) and 'smaller family housing' on strategic sites. The viability implications for developers are therefore in practice not considered significant.

9.6 With regard to accessibility evidence shows that South Gloucestershire is fairly reflective of the national picture in terms of the spread of households of people with long-term health problems and disabilities. It is also fairly reflective in terms of the increase between 2017-2037, in the % of the population that are over 65 between 2017-2037, which in any case is forecast to rise disproportionately to the rest of the population. However, South Gloucestershire is forecast to see a much greater % increase than the national average in terms of the over 85 group (135% compared with 118% nationally), with consequent higher demand amongst this group for accessible and adaptable housing.

9.7 Looking forward, South Gloucestershire is a varied area taking in both rural and inner urban communities (including priority neighbourhoods), with significant growth pressures across the locality. The West of England Joint Spatial Plan, Issues & Options (see references) places emphasis on re-use of brownfield land and urban intensification. Pressure on land and land values is not therefore likely to diminish, with potential consequent pressures on the size of dwelling units.

9.8 SGC therefore suggests that the need to introduce Nationally Described Space Standards to underpin existing practice, particularly given significant additional housing growth over the next few decades, and M4(2) & M4(3) accessibility standards to meet the needs of an ageing population is unequivocal.

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Appendix 1 – Table showing CIL, PSP & NDSS size standards for viability testing

Table showing assumed floor areas in square metres

Unit types	CIL exam		PSPDPD report April 2015		PSPDPD report With NDSS standards November 2015			
	Market	Afford.	Market	Afford.	Market		Afford.	
					Large	Small	Large	Small
1 bed flat	46	46	46	50	50	50	50	50
2 bed flat	60	57	60	61	70	61	70	61
2 bed house	71	71	71	79	79	70	79	70
3 bed house	85	85	85	93	102	84	102	84
4 bed house	115	108	115	106	115	115	115	115
5 bed house	160	160	160	160	160	160	160	160

Appendix 2

South Gloucestershire PSPDPD report

Oct-15

Date	Record URI	Name	URI	Index	Monthly change	Average price (all)	Average price (detached)	Average price (semi-detached)	Average price (terraced)	Average price (flats)
Aug-15	http://lanc	South Glou	http://lanc	327.41	0.7	£212,858	£325,859	£205,480	£171,689	£132,287
Jul-15	http://lanc	South Glou	http://lanc	325.06	1	£211,329	£323,519	£204,005	£170,457	£131,337
Jun-15	http://lanc	South Glou	http://lanc	321.94	1	£209,303	£320,418	£202,049	£168,823	£130,078
May-15	http://lanc	South Glou	http://lanc	318.81	1.7	£207,264	£317,295	£200,080	£167,178	£128,810
Apr-15	http://lanc	South Glou	http://lanc	313.54	1.4	£203,842	£312,056	£196,777	£164,417	£126,683
Mar-15	http://lanc	South Glou	http://lanc	309.27	0.8	£201,063	£307,802	£194,094	£162,176	£124,956
Feb-15	http://lanc	South Glou	http://lanc	306.87	0.3	£199,501	£305,412	£192,587	£160,917	£123,986
Jan-15	http://lanc	South Glou	http://lanc	305.95	0.3	£198,907	£304,503	£192,014	£160,437	£123,617
Dec-14	http://lanc	South Glou	http://lanc	305.01	-0.6	£198,292	£303,560	£191,419	£159,941	£123,234
Nov-14	http://lanc	South Glou	http://lanc	306.94	0.2	£199,550	£305,486	£192,634	£160,956	£124,016
Oct-14	http://lanc	South Glou	http://lanc	306.44	0.2	£199,225	£304,990	£192,321	£160,694	£123,814

Source: Land Registry

Appendix 3

Viability of National Described Space Standards March 2015 (NDSS).

Basis of sales values

Note: Land Registry shows an increase in sales values for South Gloucestershire of 4.4% between April 2015 a
We have increased the sales figures from the April 2015 report accordingly.

Tables show the floor areas and sales values for the lower end, and upper end, floor areas from NDSS standar

Lower end unit sizes

Unit type	Area sqm	VP2	VP3	VP4	VP5
1 bed flat	50	£115,000	£136,000	£167,000	£184,000
2 bed flat	61	£148,000	£159,000	£183,000	£201,000
2 bed house	70	£183,000	£204,000	£224,000	£247,000
3 bed house	84	£219,000	£271,000	£303,000	£333,000
4 bed house	115	£303,000	£365,000	£439,000	£482,000
5 bed house	160	£428,000	£480,000	£532,000	£586,000

Upper end unit sizes

Unit type	Area sqm	VP2	VP3	VP4	VP5
1 bed flat	50	£115,000	£136,000	£167,000	£184,000
2 bed flat	70	£155,000	£170,000	£195,000	£215,000
2 bed house	79	£193,000	£215,000	£236,000	£255,000
3 bed house	102	£239,000	£295,000	£330,000	£350,000
4 bed house	115	£303,000	£365,000	£439,000	£482,000
5 bed house	160	£428,000	£480,000	£532,000	£586,000

ınd August 2015.

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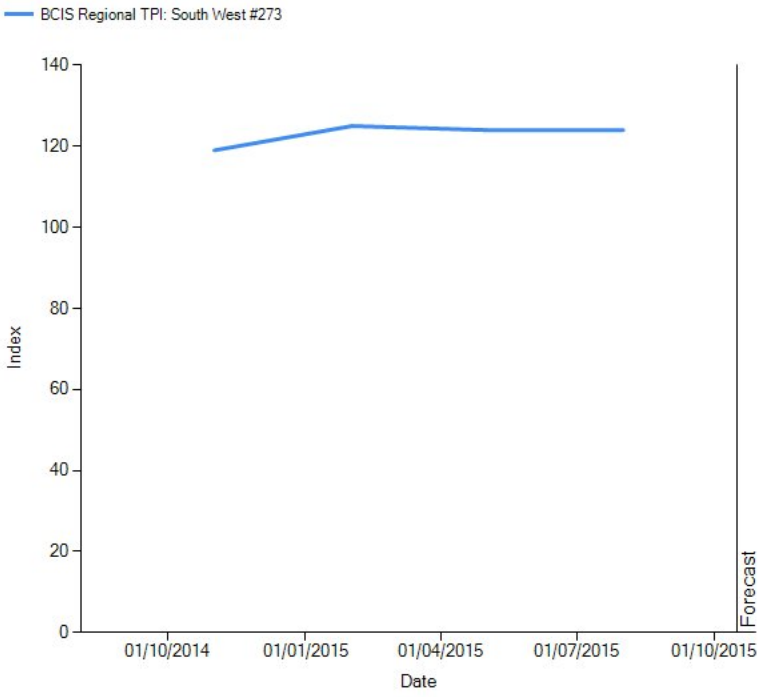
APPENDIX 4

BCIS Regional TPI: South West #273

Base date: 2010 mean = 100 | **Updated:** 16-Oct-2015 | #273

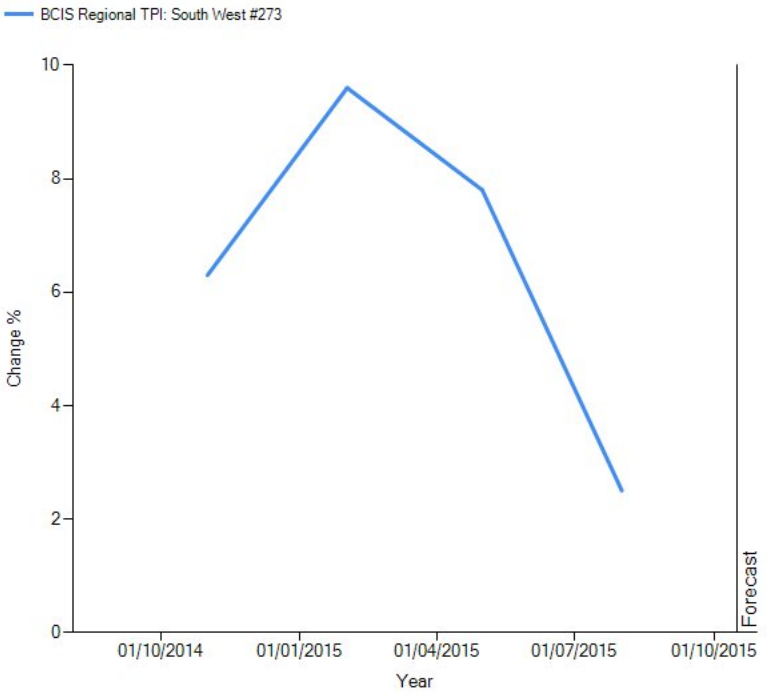
			Percentage change		
Date	**Index**	**Equiv. Sample**	**On year**	**On quarter**	**On month**
4Q 2014	119	5	6.3%	-1.7%	
1Q 2015	125	5	9.6%	5.0%	
2Q 2015	124	3	7.8%	-0.8%	
3Q 2015	124	2	2.5%	0.0%	

Index value over time



Percentage change over time

Percentage change: Year on year



Appendix 5 – Housebuilder Data

No. beds	**NDSS**	**Parcels 9&10 EGE (PK13/2649/RM) – Taylor Wimpey**		**Rodford School, Yate (PK14/0120/F) - Bellway**		**Parcels 8, 9 & 10 Charlton Hayes (PT13/4443/RM) - Bovis**	
		Mkt	AH	Mkt	AH	Mkt	AH
1	**39-50**	-	48	-	47	-	48
2	**61-79**	64	68-76	61-73	68-77	***58***-62	***57***-82
3	**74-108**	***68***-107	85	74-113	87	79-111	
4	**90-130**	109-145		109	111		
5	**103-134**	161					

No. beds	**NDSS**	**Parcel EGE (PK14/4110/RM) - Persimmon**		**Parcel 38 Charlton Hayes (PT15/3344/RM) - Linden**		**Parcel 6 & 7 EGE (PK13/2741/RM) - Barratt**	
		Mkt	AH	Mkt	AH	Mkt	AH
1	**39-50**	-	45		-	-	46
2	**61-79**	***51***-70	67-76	***55***-79	-	63-71	67-78
3	**74-108**	***69***-90	86	77-85	87	77-110	86
4	**90-130**	102-131	103-150	110	107	116-123	101
5	**103-134**						

No. beds	**NDSS**	**Gold Valley Mill, Bitton (PK15/0532/F) Linden**		**Highbrook Park, (PT12/1302/RM) Crest Nicholson**		**Barnhill Quarry (PK14/0612/RM) Bloors**	
		Mkt	AH	Mkt	AH	Mkt	AH
1	**39-50**	42		-	45-63	-	46-62
2	**61-79**	65-69		***59***	63-75	65-68	62-75
3	**74-108**	77-128		79-100	86-111	78-127	89-91
4	**90-130**	125-166		100-170	101	97-163	105
5	**103-134**			206			

No. beds	**NDSS**	**Bonnington Walk (PT14/2849/F) Redrow**		**Parcels 40, 47 & 48, Charlton Hayes (PT14/4954/RM) Bellway**		**Wootton Road, Charfield (PT11/1634/F) Woodstock homes**	
		Mkt	AH	Mkt	AH	Mkt	AH
1	**39-50**	-	47-60	47	57	-	-
2	**61-79**	-	70-79	***58***-69	***57***-72	-	62-77
3	**74-108**	105	91	74-93	87-106	80-103	81
4	**90-130**	123-151	113	109-145	106	113-170	
5	**103-134**	177-180					

Appendix 6A

Summary Table of appraisals with National Described Space Standards (NDSS)
Testing smaller unit sizes and larger unit sizes in the NDSS range for each housetype
Shows land value outcomes from the appraisals, assessed against threshold land values..

Assumes affordable tenures of 78/6/16 and affordable at 35%, to 14 unit scenarios and above.
9 unit scenarios assume zero affordable housing and zero s106 contributions.

1	2	3	4	5	6	7	8	9
No units	Density	Gross Area	Net area	Value	Land value per ha	Land Value	Land Value	LV per ha (gross)
	dph	ha	ha	Points	gross at April 2015	per ha (gross)	per ha (gross)	Larger NDSS units
						Smaller NDSS units	Larger NDSS units	Lower site coverage
9	35	0.26	0.26	VP2	£1,201,969	£1,275,419	£1,415,597	
zero afford				VP3	£2,467,777	£2,611,642	£2,779,841	
				VP4	£3,623,304	£3,831,203	£4,022,310	
				VP5	£4,512,931	£4,769,539	£4,881,241	
	50	0.18	0.18	VP2	£1,134,728	£1,164,365	£1,135,495	£966,207
				VP3	£2,268,428	£2,348,357	£2,383,498	£1,675,967
				VP4	£3,102,967	£3,219,771	£3,282,791	
				VP5	£3,976,261	£4,130,804	£4,016,875	
14	35	0.40	0.40	VP2	£710,423	£957,453	£1,138,128	
				VP3	£1,666,010	£1,953,062	£2,138,648	
				VP4	£2,476,503	£2,799,596	£2,975,776	
				VP5	£3,256,268	£3,613,444	£3,771,838	
	50	0.28	0.28	VP2	£475,804	£723,683	£753,063	£428,200
				VP3	£1,565,493	£1,842,409	£1,915,386	£1,160,269
				VP4	£2,240,418	£2,563,679	£2,643,667	
				VP5	£3,053,675	£3,412,038	£3,369,829	
35	35	1.00	1.00	VP2	£674,433	£822,211	£949,528	
				VP3	£1,671,302	£1,849,165	£1,995,940	
				VP4	£2,397,124	£2,595,733	£2,744,057	
				VP5	£3,149,094	£3,369,970	£3,468,418	
	50	0.70	0.70	VP2	£423,893	£565,048	£534,462	£394,953
				VP3	£1,490,366	£1,654,845	£1,678,751	£1,291,059
				VP4	£2,036,589	£2,212,507	£2,248,920	
				VP5	£2,806,800	£2,999,913	£2,890,372	
75	35	2.35	2.14	VP2	£393,601	£542,141	£660,593	
				VP3	£1,225,554	£1,488,043	£1,626,704	
				VP4	£1,866,295	£2,214,158	£2,355,095	
				VP5	£2,501,696	£2,936,194	£3,040,278	
	50	1.65	1.50	VP2	£55,588	£157,149	£118,946	£148,840
				VP3	£942,879	£1,166,659	£1,188,990	£1,022,435
				VP4	£1,512,574	£1,813,642	£1,849,646	
				VP5	£2,170,281	£2,562,964	£2,499,293	
300	35	10.32	8.60	VP2	£134,393	£153,572	£250,312	
				VP3	£730,543	£778,132	£883,991	
				VP4	£1,209,729	£1,275,452	£1,381,452	
				VP5	£1,661,227	£1,748,196	£1,835,285	
	50	7.20	6.00	VP2	£0	£0	£0	£0
				VP3	£616,976	£488,900	£496,191	£539,837
				VP4	£1,071,823	£911,368	£929,028	
				VP5	£1,582,701	£1,391,102	£1,351,517	

Viability by Threshold Land Values

Land value per ha April 15 Threshold Land Values per hectare

			Av LV	Greenfield	Employment	Employment	Residential
			per ha (gross)	£350,000	£1,000,000	£1,375,000	£2,200,000
Averages	35dph	VP2	£622,964				
LV/ha		VP3	£1,552,237				
		VP4	£2,314,591				
		VP5	£3,016,243				
	50dph	VP2	£522,503				
		VP3	£1,376,828				
		VP4	£1,992,874				
		VP5	£2,717,944				

Land value per ha smaller NDSS units 10.15 Threshold Land Values per hectare

			Av LV	Greenfield	Employment	Employment	Residential
			per ha (gross)	£350,000	£1,000,000	£1,375,000	£2,200,000
Averages	35dph	VP2	£750,159				
LV/ha		VP3	£1,736,009				
		VP4	£2,543,228				
		VP5	£3,287,469				
	50dph	VP2	£522,049				
		VP3	£1,500,234				
		VP4	£2,144,193				
		VP5	£2,899,364				

Land value per ha larger NDSS units 10.15 Threshold Land Values per hectare

			Av LV	Greenfield	Employment	Employment	Residential
			per ha (gross)	£350,000	£1,000,000	£1,375,000	£2,200,000
Averages	35dph	VP2	£882,832				
LV/ha		VP3	£1,885,025				
		VP4	£2,695,738				
		VP5	£3,399,412				
	50dph	VP2	£635,492				
		VP3	£1,532,563				
		VP4	£2,190,810				
		VP5	£2,825,577				

Appendix 6B

Testing larger NDSS unit sizes at a maximum coverage of 4,000 sqm per hectare

Testing 50dph only, as 35dph is already around 4,000 sqm per hectare.

Testing VP2 and VP3 only, as these are the more viability sensitive locations.

1	2	3	4	5	6	7	8	9
No. units	**Density dph**	**Gross site area**	**Developable site area**	**Coverage for larger NDSS outcomes sqm per ha**	**No. of units at 4,000 sqm per ha**	**Coverage at 4,000 sqm per ha**	**VP2 land value per ha**	**VP3 land value per ha**
9	50	0.18	0.18	4533	9	3950	£966,207	£1,675,967
14	50	0.28	0.28	4582	14	4032	£428,200	£1,160,269
35	50	0.70	0.70	4601	32	4010	£394,953	£1,291,059
75	50	1.65	1.50	4515	65	3997	£148,840	£1,022,435
300	50	7.20	6.00	4452	260	3999	£0	£539,837

Appendix 7 – Space Standards comparison within the affordable sector and NDSS.

South Gloucestershire Council have provided data of the space standards from the last 3 years of delivery of affordable housing. Generally space standards have been set out within S106 agreements following the adoption of the SPD in 2008.

Table 1a and 1b gives the average space standards delivered over the last three years. This is completion data provided by the Council and is summarised below.

The bottom row give the proposed NDSS sizes in terms of best fit to the units provided and indicates the difference between the current average delivery sizes from the last the years of data available and the new Nationally Prescribed Space Standards.

Table 1a - Rented Dwellings

		1 bed 2p flat	2 bed 3p flat	2 bed 4p house	3 5p bed house (2 storey)	3 5p bed house (3 storey)	4 bed 6p house (2storey)	4 bed 6p house (3 storey)
	2014/5	49.59	60.71	77.10	86.46	101.46	104.58	132.5
	2013/4	50.92	62.40	76.30	86.34	99.75	103.79	125.5
	2012/3	48.33	63.97	77.13	85.70	95.63	100.88	115.01
3yr average		49.7	62.1	76.8	86.3	98.2	103.7	127.0
NDSS		*50*	*61*	*79*	*93*	*99*	*106*	*112*
Difference m^2		***-0.3***	***+1.1***	***-2.2***	***-6.7***	***-0.8***	***-2.3***	***+15***

Table 1b - Intermediate

		1 bed 2p flat	2 bed 3p flat	2 4p bed house	3 bed 5p house	3 bed house 5p (3 storey)	4 bed 6p house
	2014/5	48.70	61.68	74.60	79.80		0.00
	2013/4	0.00	61.24	76.61	94.51	111.43	0.00
	2012/3	46.00	62.90	75.88	85.85		101.00
overall 3yr average		48.2	61.7	75.4	88.5	111.4	101.0
NDSS		*50*	*61*	*79*	*93*	*99*	*106*
Difference m^2		***-1.8***	***+0.7***	***-3.6***	***-4.5***	***+12.4***	***-5***

Note : Taken from completion data supplied by SGC equating to 89% of the total completions for those years (754 of 847).

It will be seen that the increased in space standards required between the average historic build rate and the NDSS is between 0.3m2 and 6.7m2. The larger units on average are larger historically than the NDSS so will not be affected.

Appendix 8 – Household Statistics

The National Picture

Nationally some 30% of all households contain a person with long term illness or disability. In the owner occupied sector, 27% experience long term illness or disability, in the private rented sector it is 22% while in the social rented sector this figures of 48% of all households. [1]

Of the total households in the same time period 3.3% of all households (726,000) contained a wheelchair use. (There is no breakdown between the different tenures).[2]

Of the 726,000 households containing at least one wheelchair user, 46% of these the wheelchair user was over 75 years old, 28% between 60 and 74 and 25% under the age of 60 years. [2]

The 2013-14 English Housing Survey gives further information in relation to the social housing sector.

Of the 3,924,000 households in the social rented sector 256,000 had members of the household that used a wheelchair (indoors or out). This equates to 6.5% for the whole tenure, with 6.8% in the local Authority sector and 6.3% in the Housing Association sector.[3]

Of the total households with a wheelchair user (256,000), only 27% enjoyed all four of the basic visitability standards[4] with 33% having only one or none of the basic visitability standards within their homes.

This indicates that a significant proportion of wheelchair containing households in the social rented stock are not provided with adequate housing facilities for their wheelchair use.

On a wider tenure basis the 2013-14 English Housing Survey- profile of English Housing visitability within the whole stock. While this relates to M4(1) style standards it indicates that within the owner occupied sector only 4%[5] of the stock meets the four visitability standards while this is 12%[5] within the Social Rented sector.

As expected the level of visitability within the newer post 1990 whole stock is higher at 27% compared to 2.2% of the pre-1990 built stock.[5] Overall 6% of the whole of the stock (England) meets the four visitability standards.

[1] Source English Housing Survey 2011to 2012 household report annex tables 6.1. Reference Person. Percentages rounded.
[2] Source English Housing Survey 2011to 2012 household report annex tables 6.11. Reference Person. Percentages rounded.
[3] English Housing Survey 2013-14 Annex Table 5.16.
[4] the four visitability standards are level access, level thresholds, ground floors WC and circulation space of at least 81cm. (similar but not the same as M4(1)/ old Part M of Building Regulations.
Source English housing Survey, profile of housing 2013.14 annex table 2.9.

This enables people to visit dwellings and on an ongoing basis will be delivered via the M4 (1) provisions but does not make sufficient provision for the 30% of households who current contain a person with long term illness or disability or allows the adaptation to meet changing needs of occupants over time.

South Gloucestershire Evidence.

Census Data (2011)

The last census in 2011 indicates that the level of those with long term health problems or disability is 6.4% of South Gloucestershire's population compared to the national picture of England being 7.9%. Those with activities limited a little are 8.7% in south Gloucestershire and 9.3% in England. The increases to 22% for the over 65% in South Gloucestershire and 25% in England.

23.2% of households had one person with a long term health problem compared to 25.7% of households in England. Of those 18.6% contained a dependent child in South Gloucestershire compared to 18% in England.

The Census is a snapshot of information but indicates that the national pattern is found in South Gloucestershire with a spread of households with people with long term health problems and disabilities.

Older Peoples Needs

The over 65's population is increasing nationally. The current national picture for the market and social rented sector is as follows:

Table 1 - Over 65's and Over 75's (2012-13 – English Housing Survey) - all households

Age Bands	Owner Occupier	Private Rented	Social Rented	Total
Over 65's. (000's)	4,602 (32% of total OO)	304 (7.7%)	1,050 (28.5%)	5,956 (27%)
Over 75's. (000's)	2,266 (15.8%)	152 (3.8%)	583(15.8%)	3,001 (13.6%)
ALL (000's)	14,337	3,956	3,684	21,977

Source: English housing Survey 2012-2013 Annex Table 2.1.

Table 2 - Population as a % of the whole population

	2017	2037
Pensionable Age*	18.7%	22%
60 and over	22%	29.4%
75 and over	7.6%	13%

85 and over	2.1%	4.9%
All	100%	100%

Source : Table 4 population Forecast mid 2012. *Pensionable age changes over time.

Table 3 - Population as a % of the whole South Gloucestershire population

	2017	2037
60 and over	24%	30%
75 and over	8.3%	12.5%
85 and over	2.2%	4.5%
All	100%	100%

Source: 2012 based household projections Data. 2017-2037 basis used to aid comparisons with national forecasts. Pensionable Age local forecast not available.

Table 4 - Population growth forecast:

	2017	2037	% increase
Pensionable Age*	12.3m	16.1m	29%
60 and over	14.5m	21.6m	49%
75 and over	5.0m	9.5m	73%
85 and over	1.4m	3.6m	118%
All	65.8m	73.3m	11%

Source : Table 4 population Forecast mid 2012. *Pensionable age changes over time.

Table 5 - Comparative Forecast for South Gloucestershire:

	2017	2037	% increase
60 and over	65,473	92,153	42%
75 and over	22,713	39,147	71%
85 and over	6,010	14,095	135%
All	273,063	312,376	14.6%

Source: 2012 based household projections Data. 2017-2037 basis used to aid comparisons with national forecasts. Pensionable Age local forecast not available.
(Note - this is not a SHMA which will also take account of employment and other factors to give a HH growth estimate and associated OAN figures – publication of the SHMA may update these figures).

Other data

The POPPI data forecasts that the over 65's population in south Gloucestershire unable to manage at least one domestic task if forecast to grow by 52% between 2014 and 2030 while those unable to manage at least one activity is set to grow by 56% over the same period.

PANSIS data covering the 18-64 age range forecasts an increase of those having a serious physical disability will increase by 9% over the 2014-2030 period.

Disabled Facilities Grants

Disabled Facilities Grants are provided to help with small adaptations (i.e. grab-rails) to significant alternations to enable people to stay in their own homes. Homes built to enable the adaptations allow for adaptations to take place when required to enable the occupier being owner, private or social renter to remain in their own home.

Table 6 - The number of Disabled Facilities Grant in South Gloucestershire

DFG BY TENURE 2010/11 - 2014/15			
(Completions)	**2012/13**	**2013/14**	**2014/15**
Owner Occupied	103	91	116
% of total grants	61%	59%	60%
Social Rented	59	52	64
% of total grants	35%	34%	33%
Private Rented	6	10	12
% of total grants	4%	7%	6%
TOTAL	**168**	**153**	**192**

Note – does not include 289 small grants of £250-1000 for small adaptations. Not all adaptations will relate to wheelchair use but some form of access issues.

While the DFG deals with an adaptations, it is budget limited, and may not enable the full M4(2) aspects to be incorporated due the configuration or age of the home. There is clearly demand for the DFG which can be more efficiently spent on homes which are already configured to allow use of the home for the long term as set out in M(4)2.

The 2011 stock condition Survey identified that potential demand adaptations in respect of disability could be as high as £35m. This is compared to the annual CLG budget of £699,000 which is pressed to meet the needs. The survey did not take account of the Social Rental stock where the demand is proportionately higher as table 6 indicates with some 34% of the spend on 12% of the stock (census 2011- social rented).