

EPPING FOREST DISTRICT LOCAL PLAN

EXAMINATION HEARINGS

HOMEWORK NOTE 19

MATTER 16: DEVELOPMENT MANAGEMENT POLICIES (DM 1 – DM 22)

ISSUE 1: ARE THE DEVELOPMENT MANAGEMENT POLICIES IN THE PLAN JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY IN RESPECT OF THE SPECIFIC MATTERS SET OUT BELOW? ARE THERE ANY OTHER ISSUES CONCERNING THEIR SOUNDNESS?

**HW19 - EVIDENCING THE NEED FOR THE INCLUSION
OF THE NATIONALLY DESCRIBED SPACE
STANDARDS IN POLICY DM 10**

1. The Council provides this note which concerns Matter 16, Issue 1 and the Inspector's request that the Council provides evidence to justify the Council's decision to include the Nationally Described Space Standards (NDSS) within the LPSV in Policy DM 10.
2. As outlined in the Council's response to Question 22 within the hearing statement for Matter 16, Issue 1, evidence from development management officers and analysis of recent pre-application discussions and planning applications, indicates that developments are being proposed in the District which do not meet NDSS. The Council considers that this has an unacceptable impact on the living conditions of future occupants. The Council was supported by the Secretary of State in an appeal following a refusal of planning permission on the basis of unacceptable living conditions (see APP/J1535/W/16/3144859).

The Inspector noted that the proposed development failed to provide acceptable living conditions in terms of internal space and layout, noting that the NDSS was material to the issue and attaching significant weight to the NDSS. Thus, whilst the Council is already seeking to achieve these minimum internal space standards, it is considered helpful to provide clarity and certainty on this through policy.

3. The NDSS sets out the national internal space standards for new dwellings, in particular, requirements for the Gross Internal Area (GIA) and floor, built-in storage, bedroom sizes and floor-to-ceiling dimensions.

4. The Council justifies the inclusion of these standards based upon the guidance contained in Planning Practice Guidance (PPG) Housing: optional technical standards [Paragraph: 002 Reference ID: 56-002-20160519] which states that:

'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.'

5. Appropriate evidence in relation to the other matters for the Council to take account of in establishing a need for internal space standards as set out in the PPG, namely the consideration of the NDSS on the viability of the LPSV and timing for adoption, has been provided in the Council's hearing statement concerning Matter 16 Issue 1 Policy DM 10 and were discussed at the Examination Hearing on 26 March 2019 and are therefore not considered further in this note.

Evidencing the Need

6. To ensure future residential developments are of sufficient high quality, it is considered that there is a need for regulated internal space standards. Adoption of the NDSS within the Local Plan will provide a clear policy framework to ensure high quality design in future developments and a sound policy basis by which the design quality of new dwellings can be assessed.

7. A desktop review compiled from a sample of 18 developments, with a total of 643 dwellings, has been carried out to see whether recent major residential schemes (10 homes or more) in the District permitted between 2013 - 2017 meet the NDSS. For each dwelling, the relevant dimensions were measured from floor plans submitted within the planning application.
8. Within each development reviewed, the following information was recorded from each floor plan:
 - Whether the dwelling is tenured as Market or Affordable
 - Number of bedrooms
 - Number of bedspaces
 - Number of storeys
 - Measured GIA (sqm)
 - Measured built-in storage (sqm)
 - Number of single bedrooms
 - Smallest single bedroom area (sqm)
 - Smallest single bedroom width (sqm)
 - Number of double/twin bedrooms
 - Smallest double/twin bedroom area (sqm)
 - Double bedroom width/s (m)
 - Average floor to ceiling height (m)
9. Appendix 1 of this note details the measurements taken and is colour coded to indicate compliance against the NDSS. The colours indicate whether the measurement is equal to or above the standard (green), up to 5% below the standard (amber), and over 5% below the standard (red). The Council considers that this a suitable threshold criteria by which the future living conditions of residents can be assessed.
10. The study indicated the following in relation to the NDSS:
 - 43% of dwellings fall below the prescribed GIA, with 30% over 5% below the threshold

- Broken down by tenure, 43% of affordable dwellings were over 5% below the prescribed GIA, whilst 24% of market dwellings were over 5% below the standard.
 - 51% of dwellings do not meet the required storage space, with 48% over 5% below the standard.
 - 60% of dwellings do not meet the required single bedroom space requirements, with 54% over 5% below the standard.
 - 28% do not meet the required minimum width of the single bedroom, with 9% over 5% below the standard.
 - 48% of dwellings do not meet the required double/twin bedroom space requirements, with 38% over 5% below the standard.
 - 77% do not meet the required minimum width on either the principal or other double/twin.
 - The majority of the developments do not have approved section drawings of the dwellings and therefore measurements and analysis of the ceilings heights has not been possible.
11. The results indicate that only 28% of the sample taken has either met or exceeded every single standard. This means that 72% of all dwellings within the sample had at least one measurement that failed to meet the standards. The Council therefore considers it reasonable to conclude that the District has an identified need to implement the internal space standards as the combined standards are not currently being met on the majority of developments.
12. The Council considers that by implementing the internal space standards it will secure a consistent level of habitable space across all dwellings; improve health and wellbeing for residents and generally ensure satisfactory living conditions; provide additional flexibility to homes that can adapt to changing needs and lifestyles, leading to more balanced and stable communities; and generate support for further redevelopment.

APPENDIX 1

Development Scheme	Planning Application No.	Net Dwellings	House Types	Number of Units	Market or Affordable (M/A)	No. of Bedrooms	No. of Bedspaces	No. of Storerooms	GIA		Storage		Single Bedroom					Double Bedroom							
									Minimum GIA (sqm)	Measured GIA (sqm)	Internal Floor, Pass/Fail	Measured Built in Storage (sqm)	Storage, Pass/Fail	Smallest Single Bedroom Area (sqm)	Single bedroom, Pass/Fail	Smallest Single Bedroom Width (m)	Single Bedroom width, Pass/Fail	Smallest Double / Twin Bedroom area (sqm)	Smallest Double/Twin Bedroom, Pass/Fail	Double/Twin Bedroom width and largest width measured (m)	Principal Double/Twin Bedroom width (≥2.75m wide)	All other Double/Twin Bedrooms on width, Pass/Fail (≥2.55m wide)	All double/twin meet standards	All standards met or exceeded	Average Ceiling Height (m)
268278 High Road	EPF/0055/17	12	1 bed	1	M	1	2	1	50.00	48.50	>=95%<100%	0.73	<95%	n/a	n/a	n/a	n/a	11.32	>=95%<100%	2.73	no	n/a	no	no	2.60
			1 bed	1	M	1	2	1	50.00	48.50	>=95%<100%	0.72	<95%	n/a	n/a	n/a	n/a	11.32	>=95%<100%	2.73	no	n/a	no	no	2.60
			1 bed	1	M	1	2	1	50.00	48.50	>=95%<100%	0.71	<95%	n/a	n/a	n/a	n/a	11.32	>=95%<100%	2.73	no	n/a	no	no	2.60
			2 bed	1	M	2	4	1	70.00	57.90	<95%	1.00	<95%	n/a	n/a	n/a	n/a	10.66	<95%	2.79, 2.74	yes	yes	yes	yes	2.60
			2 bed	1	M	2	4	1	70.00	57.90	<95%	1.00	<95%	n/a	n/a	n/a	n/a	10.66	<95%	2.79, 2.74	yes	yes	yes	yes	2.60
			2 bed	1	M	2	4	1	70.00	57.90	<95%	1.00	<95%	n/a	n/a	n/a	n/a	10.66	<95%	2.79, 2.74	yes	yes	yes	yes	2.60
			2 bed	1	M	2	4	1	70.00	57.90	<95%	1.00	<95%	n/a	n/a	n/a	n/a	10.66	<95%	2.79, 2.74	yes	yes	yes	yes	2.60
			2 bed	1	M	2	4	1	70.00	57.90	<95%	1.00	<95%	n/a	n/a	n/a	n/a	10.66	<95%	2.79, 2.74	yes	yes	yes	yes	2.60
			2 bed	1	M	2	4	1	70.00	57.90	<95%	1.00	<95%	n/a	n/a	n/a	n/a	10.66	<95%	2.79, 2.74	yes	yes	yes	yes	2.60
			3 bed	1	M	3	5	1	86.00	78.90	<95%	3.56	>=100%	7.80	>=100%	2.16	>=100%	9.63	<95%	3.24, 2.68	yes	yes	yes	yes	2.60
The Paddock	EPF/0329/17	12	Type A11	1	M	3	5	2	93.00	126.00	>=100%	6.26	>=100%	9.62	>=100%	2.53	>=100%	12.20	>=100%	3.20, 3.20	yes	yes	yes	yes	2.60
			Type A11	1	M	3	5	2	93.00	126.00	>=100%	6.26	>=100%	9.62	>=100%	2.53	>=100%	12.20	>=100%	3.20, 3.20	yes	yes	yes	yes	2.60
			Type A21	1	M	3	5	2	93.00	126.00	>=100%	6.26	>=100%	9.62	>=100%	2.53	>=100%	12.20	>=100%	3.20, 3.20	yes	yes	yes	yes	2.60
			Type A21	1	M	3	5	2	93.00	126.00	>=100%	6.26	>=100%	9.62	>=100%	2.53	>=100%	12.20	>=100%	3.20, 3.20	yes	yes	yes	yes	2.60
			Type B	1	M	3	5	2	93.00	129.00	>=100%	6.26	>=100%	9.62	>=100%	2.53	>=100%	12.20	>=100%	3.20, 3.20	yes	yes	yes	yes	2.60
			Type B	1	M	3	5	2	93.00	129.00	>=100%	6.26	>=100%	9.62	>=100%	2.53	>=100%	12.20	>=100%	3.20, 3.20	yes	yes	yes	yes	2.60
			Type B	1	M	3	5	2	93.00	129.00	>=100%	6.26	>=100%	9.62	>=100%	2.53	>=100%	12.20	>=100%	3.20, 3.20	yes	yes	yes	yes	2.60
			Type B	1	M	3	5	2	93.00	129.00	>=100%	6.26	>=100%	9.62	>=100%	2.53	>=100%	12.20	>=100%	3.20, 3.20	yes	yes	yes	yes	2.60
			Type C	1	M	3	5	2	93.00	130.00	>=100%	6.26	>=100%	9.62	>=100%	2.53	>=100%	12.20	>=100%	3.20, 3.20	yes	yes	yes	yes	2.60
			Type C	1	M	3	5	2	93.00	130.00	>=100%	6.26	>=100%	9.62	>=100%	2.53	>=100%	12.20	>=100%	3.20, 3.20	yes	yes	yes	yes	2.60
Manor Road	EPF/2636/17	12	Flat 1	1	M	1	2	1	50.00	46.00	<95%	3.65	>=100%	n/a	n/a	n/a	11.80	>=100%	3.14	yes	n/a	yes	no	n/a	
			Flat 2	1	M	1	2	1	50.00	46.00	<95%	3.65	>=100%	n/a	n/a	n/a	11.80	>=100%	3.14	yes	n/a	yes	no	n/a	
			Flat 3	1	M	1	2	1	50.00	46.00	<95%	3.65	>=100%	n/a	n/a	n/a	11.80	>=100%	3.14	yes	n/a	yes	no	n/a	
			Flat 4	1	M	1	2	1	50.00	46.00	<95%	3.65	>=100%	n/a	n/a	n/a	11.80	>=100%	3.14	yes	n/a	yes	no	n/a	
			Flat 5	1	M	2	4	1	70.00	57.90	>=100%	3.60	>=100%	7.80	>=100%	2.34	>=100%	10.83	<95%	3.10, 2.55	yes	yes	yes	no	n/a
			Flat 6	1	M	2	4	1	70.00	57.90	>=100%	3.60	>=100%	7.80	>=100%	2.34	>=100%	10.83	<95%	3.10, 2.55	yes	yes	yes	no	n/a
			Flat 7	1	M	2	4	1	70.00	57.90	>=100%	3.60	>=100%	7.80	>=100%	2.34	>=100%	10.83	<95%	3.10, 2.55	yes	yes	yes	no	n/a
			Flat 8	1	M	2	4	1	70.00	57.90	>=100%	3.60	>=100%	7.80	>=100%	2.34	>=100%	10.83	<95%	3.10, 2.55	yes	yes	yes	no	n/a
			Flat 9	1	M	2	4	1	70.00	57.90	>=100%	3.60	>=100%	7.80	>=100%	2.34	>=100%	10.83	<95%	3.10, 2.55	yes	yes	yes	no	n/a
			Flat 9	1	M	2	4	1	70.00	57.90	>=100%	3.60	>=100%	7.80	>=100%	2.34	>=100%	10.83	<95%	3.10, 2.55	yes	yes	yes	no	n/a
Norton Heath Riding Centre	EPF/0034/16	30	Plot 13	1	A	2	4	2	79.00	74.15	<95%	1.80	<95%	n/a	n/a	n/a	11.76	>=100%	3.13, 3.10	yes	yes	yes	no	n/a	
			Plot 13	1	A	2	4	2	79.00	74.15	<95%	1.80	<95%	n/a	n/a	n/a	11.76	>=100%	3.13, 3.10	yes	yes	yes	no	n/a	
			Plot 46	1	A	2	4	2	79.00	74.15	<95%	1.80	<95%	n/a	n/a	n/a	11.76	>=100%	3.13, 3.10	yes	yes	yes	no	n/a	
			Plot 46	1	A	2	4	2	79.00	74.15	<95%	1.80	<95%	n/a	n/a	n/a	11.76	>=100%	3.13, 3.10	yes	yes	yes	no	n/a	
			Plot 46	1	A	2	4	2	79.00	74.15	<95%	1.80	<95%	n/a	n/a	n/a	11.76	>=100%	3.13, 3.10	yes	yes	yes	no	n/a	
			Plot 78	1	A	3	5	2	93.00	90.30	>=95%<100%	4.75	>=100%	5.80	>=100%	2.22	>=100%	8.45	<95%	2.67, 3.30	yes	yes	yes	no	n/a
			Plot 78	1	A	3	5	2	93.00	90.30	>=95%<100%	4.75	>=100%	5.80	>=100%	2.22	>=100%	8.45	<95%	2.67, 3.30	yes	yes	yes	no	n/a
			Plot 911	1	A	2	4	2	79.00	74.15	<95%	1.80	<95%	n/a	n/a	n/a	11.76	>=100%	3.13, 3.10	yes	yes	yes	no	n/a	
			Plot 911	1	A	2	4	2	79.00	74.15	<95%	1.80	<95%	n/a	n/a	n/a	11.76	>=100%	3.13, 3.10	yes	yes	yes	no	n/a	
			Plot 911	1	A	2	4	2	79.00	74.15	<95%	1.80	<95%	n/a	n/a	n/a	11.76	>=100%	3.13, 3.10	yes	yes	yes	no	n/a	

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									Minimum GIA (sqm)	Measured GIA (sqm)	Internal Floor, Pass/ Fail	Measured Built in Storage (sqm)	Storage, Pass/Fail	Smallest Single Bedroom Area (sqm)	Single bedroom, Pass/Fail	Smallest Single Bedroom Width (m)	Single Bedroom width, Pass/Fail	Smallest Double / Twin Bedroom area (sqm)	Smallest Double/twin bedroom, Pass/ Fail	Double/Twin Bedroom width/4 (1'smallest and largest widths measured) (m)	Principal Double/Twin Bedroom width, Pass/Fail (>=2.75m wide)	All other Double/TwinBedroom width, Pass/Fail (>=2.55m wide)		All double/twin bedroom widths meet standards	All standards met or exceeded
Fyfield Business and Research Park			HA_3Bed	1	A	3	5	2	93.00	92.90	>=95%<100%	2.31	<95%	6.32	<95%	2.24	>=100%	10.32	<95%	3.00, 2.42	yes	no	no	no	n/a
Fyfield Business and Research Park			HA_3Bed	1	A	3	5	2	93.00	92.90	>=95%<100%	2.31	<95%	6.32	<95%	2.24	>=100%	10.32	<95%	3.00, 2.42	yes	no	no	no	n/a
Fyfield Business and Research Park			HA_3Bed	1	A	3	5	2	93.00	92.90	>=95%<100%	2.31	<95%	6.32	<95%	2.24	>=100%	10.32	<95%	3.00, 2.42	yes	no	no	no	n/a
Fyfield Business and Research Park			HA_3Bed	1	A	3	5	2	93.00	92.90	>=95%<100%	2.31	<95%	6.32	<95%	2.24	>=100%	10.32	<95%	3.00, 2.42	yes	no	no	no	n/a
Fyfield Business and Research Park			HA_3Bed	1	A	3	5	2	93.00	92.90	>=95%<100%	2.31	<95%	6.32	<95%	2.24	>=100%	10.32	<95%	3.00, 2.42	yes	no	no	no	n/a
Fyfield Business and Research Park			HA_3Bed	1	A	3	5	2	93.00	92.90	>=95%<100%	2.31	<95%	6.32	<95%	2.24	>=100%	10.32	<95%	3.00, 2.42	yes	no	no	no	n/a
Fyfield Business and Research Park			HA_3Bed	1	A	3	5	2	93.00	92.90	>=95%<100%	2.31	<95%	6.32	<95%	2.24	>=100%	10.32	<95%	3.00, 2.42	yes	no	no	no	n/a