

**Birmingham City Council**

**Local Plan**

**Development Management in Birmingham**

**Development Plan Document**

Standards for Residential Development

 Topic Paper

**July 2020**

**Contents Page**

1. **Introduction 2**
2. **Planning Policy Context 2**
3. **Internal Space Standards Evidence 8**
4. **Building Regulations M4 (2) Category 2 Standard Evidence 18**
5. **Conclusions 24**

**Appendices**

1. Technical Housing Standards - Nationally Described Space Standard (March 2015 as updated)
2. **Introduction**
	1. This topic paper has been produced to support ‘Policy DM10 Standards for Residential Development’ proposed in the Development Management in Birmingham Development Plan Document (DMB). Policy DM10 seeks to introduce elements of the Housing: optional national technical standards for new developments in Birmingham, specifically the ‘access’ and ‘space’ components.
	2. In 2015 the government set out a new approach to housing technical standards in a Written Ministerial Statement.[[1]](#footnote-1) Whilst the majority of the reforms were incorporated into Building Regulations, the space, water and enhanced accessibility standards were treated as optional standards that Local Planning Authorities (LPAs) can adopt through their local plan, where there is demonstrated to be a local need.
	3. LPAs have to gather evidence to determine whether there is a need for additional standards in their area and that they have considered the viability implications of adopting them, to justify setting policies in their local plans.
	4. This paper therefore provides evidence of need for the optional technical standards relating to space and accessibility in Birmingham, demonstrates that the introduction of these enhanced optional standards will not have a significant impact on the viability of development in the city and justifies inclusion of the optional Nationally Described Space Standards[[2]](#footnote-2) and Building Regulations Part M4(2) (accessible and adaptable dwellings) standard.[[3]](#footnote-3)

**2.0 Planning Policy Context**

 **National**

2.1 The National Planning Policy Framework (NPPF) sets out government’s planning policies for England and how these are to be applied. The NPPF is clear that local planning authorities should plan to create safe, accessible environments and promote inclusion and community cohesion. In achieving well designed places, para. 127 of the NPPF says that *“Planning policies and decisions should ensure that developments …. f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users(46); and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

2.2 *Footnote (46) states: “Planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.”*

2.3 The government has provided additional guidance in the form of the online Planning Practice Guidance (PPG) resource. The PPG ‘Housing: optional technical standards’ makes clear that where LPAs wish to adopt any of the optional technical housing standards, they should be clearly evidenced to determine whether there is a need for additional standards in their area.

2.4 The PPG suggests that the following information is considered when deciding whether or not to introduce the optional standards:

* 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.

2.5 The Government’s Nationally Described Space Standard (NDSS) (Appendix 1) sets out the minimum requirements for the Gross Internal (floor) Area (GIA) of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage, floor to ceiling height and a minimum requirement for built-in storage (BiS).

2.6 The PPG clarifies that if a local authority wishes to apply the NDSS within its area, evidence needs to be gathered to determine whether there is a local basis for adopting them, as well as consideration of how the setting of optional standards affects viability and delivery of development. 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.

 **Local**

Birmingham Development Plan

2.7 The Birmingham Development Plan (BDP) was adopted in January 2017. Policy PG1 sets out the overall levels of growth required for the plan period, which includes the provision of at least 51,100 new homes. As well as planning to provide for a suitable amount of new housing development, the plans seeks to ensure that a range and mix of housing types, sizes and tenure are delivered to meet local needs and support the creation of sustainable neighborhoods (Policy TP30). Given that at least 51,100 new dwellings will be delivered in Birmingham, the proposed standards in policy DM10 will help to ensure that new development is of sufficient size, quality and flexibility for the needs of the occupants of new homes.

2.8 One of the key objectives of the BDP is *“to develop Birmingham as a City of sustainable neighbourhoods that are safe, diverse and inclusive with locally distinctive character.”* High standards of design in new residential areas and the provision of a wide choice of housing sizes, types and tenures to meet community needs, including homes for families, the elderly and appropriate levels of affordable housing is central to the strategy of the BDP.

2.9 Specific policies (summarized below) in the BDP relevant to matters of housing standards include:

* Policy PG3 ‘Place making’ – expects all development to demonstrate high design quality, contributing to a strong sense of place.
* Policy TP27 ‘Sustainable neighbourhoods’ – requires new housing to contribute to making sustainable places characterised by a wide choice of housing sizes, types and tenures to ensure balanced communities catering for all incomes and ages and a strong sense of place with high design quality.
* Policy TP30 ‘The type, size and density of new housing’ – expects proposals to deliver a range of dwellings to meet local needs and support the creation of mixed, balanced and sustainable neighbourhoods.

2.10 Supporting text to Policy TP30, paragraph 8.16 in the BDP states that “*New housing should add to the choice of accommodation available to people, whatever their circumstances. It should therefore be a mix of both market and affordable housing and should consist of a mixture of tenures and prices, sizes and types. It should cater for specific needs, such as a wider choice of housing options for people whose current home is no longer suitable for their needs.”* It is in the context of these clear policy ambitions that the Council is seeking to introduce housing standards into the Local Plan through the DMB. The aim of creating sustainable neighbourhoods and ensuring high quality design is of particular relevance to space standards and the creation of accessible and adaptable homes in Birmingham.

Birmingham Strategic Housing Market Assessment (2013)

2.11The SHMA underpins the housing policies set out in the BDP. As part of assessing housing need, the SHMA assessed the suitability of household’s current housing. It was estimated that a total of 85,813 households were living in unsuitable housing. This represents 20.8% of all (non-student) households in Birmingham. Figure 7.1 from the report summarises the numbers of households living in unsuitable housing. The main cause of unsuitable housing is overcrowding, at 30,911 (36%) households. Households with support needs/ mobility issues comprised 14,922 (17.4%) households.



Council Plan 2018-2022[[4]](#footnote-4)

2.12 With a rising demand for services (especially adult social care), financial pressures and the need to invest in children’s services, Birmingham City Council plans to focus resources on five key priorities:

* Birmingham is an entrepreneurial city to learn, work and invest in
* Birmingham is an aspirational city to grow up in
* Birmingham is a fulfilling city to age well in
* Birmingham is a great city to live in
* Birmingham residents gain the maximum benefit from hosting the Commonwealth Games

2.13 Two of the six key outcomes in the Council’s Plan are particularly relevant to DM10:

*“Birmingham is a fulfilling city to age well in – …citizens to live more active, longer, healthier and independent lives….”*

*Birmingham is a great city to live in -*  “… *Birmingham to be a sustainable city of vibrant culture, flourishing neighborhoods with good quality housing….”*

Birmingham: A Great Place to Live (2017)

2.14 The documents has been prepared in partnership with key housing stakeholders including registered providers, private landlords, third sector bodies, and the Homes and Communities Agency and set out the housing priorities for the city.. Its overall vision is that *“Every citizen can find a great place to live”* which means:

* *A strong supply of new high quality homes;*
* *Citizens are able to find, access and sustain housing that meets their needs;*
* *Neighbourhoods are enhanced and the quality of existing housing is improved.*

2.15 The strategy notes that household sizes in Birmingham are larger than the national average and there are pockets of high overcrowding in the city. There are five wards in the city where more than one in five households are short of at least one bedroom and in a further 6 wards, one in ten households suffer the same problem. This is reflected in the SHMA (2013) and the Birmingham Development Plan’s housing mix requirement (Policy TP30). The strategy highlights that many homes, across all tenures, are under-occupied. In 32 of the 40 wards, half of all households have at least one spare bedroom. This implies that a significant number of people would prefer to remain in their own homes for as long as possible and/ or there is lack of suitable accommodation for older people to downsize to within the city.

2.16 Development is recognized as providing an opportunity to increase the choice of housing types and options. In relation to the population profile of the city it states that: *“Whilst Birmingham is a young city, we also have an ageing population. The links between suitable housing and health and wellbeing are well established. We have identified that there is an opportunity to develop housing options for older people who wish to move to a more suitable property within the city. Older owner-occupiers have considerable resources in terms of the equity they hold in their homes. Increased housing options for older people would have considerable benefits both in terms of releasing family housing and for the wellbeing and independence of older residents.”*

Housing in Later Life Market Position Statement (2015)

2.17 Housing in Later Life Market Position Statement (MPS) (2015) document outlines the demand and opportunities to expand housing choices for older people. It highlights that housing and health often become intrinsically linked with ageing, and as the majority of the population continues to live longer lives this will also present a continuing increase in demand for quality housing and care solutions city wide.

2.18 Birmingham, like other cities, has a priority to reduce the proportion of its residents admitted to and living long term in residential care settings. As the older population grows it will not be sustainable for the current levels to be maintained. Service providers agree that, wherever possible, to enhance the quality of life for those both living with dementia and their families, that it is important for older people with mild to moderate symptoms of dementia to remain living independently at home / in the community. The position statement identifies three topics fundamental for the market to consider: Ageing well; Successfully enabling good health and wellbeing; and delivering real choice, quality and affordability across housing and care services.

2.19 In particular the MPS seeks that the following is integral to planning and developing housing choices for older people: *“Health and wellbeing – the need to ensure that older people have the opportunity to live in homes and environments that make a positive contribution to their health and wellbeing by enabling an active, healthy lifestyle; combating social isolation and helping to mitigate the effects of dementia.”*

Market Position Statement for Older Adults Social Care (2018)

2.20 In addition to the above document, the Council published a Market Position Statement for Older Adults Social Care in 2018 for provider organisations to understand the opportunities to address local need and demand. The Council’s approach is based on a Prevention Pyramid Model which seeks to prevent people from becoming dependent on care, helping people access services and opportunities in their community, and re-enabling them to live independently where possible.

2.21 Over half of the long-term packages of care commissioned by Birmingham City Council for people aged 65 and over are domiciliary care packages. The majority of these are in people’s own homes, but some are for people living in the City’s growing number of housing with care developments. The Council’s aim is to increase uptake of ‘Direct Payments’, so that people can live more independently and choose for themselves the types of support they want to purchase. It is envisaged that there will be an increase in older people choosing to commission their own care, with support from the Council. In 2017, the documents states that the Council provided almost 5,000 older people with assistive technology. This includes large adaptations to the home, such as stairlifts and adapted bathrooms, to smaller pieces of equipment to help around the home.

 Birmingham’s Market Position Statement for Learning Disabilities Social Care (2015)

2.22 This particular statement identifies that prevalence figures taken from the Projecting Adult Needs and Service Information System (www.PANSI.org.uk) indicate that there were some 16,050 working-age adults with a learning disability in Birmingham in 2011, along with 2,817 adults over the age of 65. It also states that “population growth in Birmingham will mean the number of people with LD will also increase, by around 7.5% in the next ten years. This has the potential to put increasing pressure on services.”

2.23 The Council intends to remodel the traditional focus of the care market for Learning Disabilities in Birmingham; by moving away from the current reliance on bed-based care, towards personalisation through increasing ‘Direct Payments’ and ‘Shared Lives’. ‘Shared Lives’ (formerly known as Adult Placements), offers a person-centred alternative to care homes. It is a regulated model of care which involves people living with carefully-recruited

carers in their homes; so that they become a part of the family and are involved in community life. ‘Direct Payments’ allows someone to choose and buy the services they need, instead of getting them from the local Council.

**3. Internal Space Standards Evidence**

3.1 In order to establish whether the adoption of the space standards would be justified, this paper assesses whether there is a need, as well as whether adoption would have any viability or timing implications for housing delivery in the city.

 **Need**

3.2 In recent years there has been growing public concern nationally about the quality of new homes. As house prices have increased, alongside a relative lack of choice for homebuyers leading to intense competition for news homes, there have been concerns regarding the quality of homes being delivered. In response to these concerns, NDSS was introduced in 2015.

3.3 While the needs of occupants will vary, NDSS represents a benchmark for all new dwellings across the country and across tenures, which balances being achievable and ensuring adequate space. The Royal Institute of British Architects (RIBA) made a strong case to Government for embedding the national minimum space standards into the Building Regulations[[5]](#footnote-5). This approach would set the standards for housing design across the country to create a level playing field and a fair housing offer wherever people live. In the absence of this approach, Birmingham City Council seeks to adopt the standards as set out in Policy DM10 to help achieve its stated policy aims.

3.4 Concerns about poor residential space standards are particularly relevant in Birmingham due to natural constraints on developable land which is reflected in high development densities, particularly in the central areas of Birmingham where densities of over 200 dwellings per hectare are common. Policies in the BDP also seek to maximise development potential and make efficient use of available sites, whilst achieving sustainable development and respecting local character and heritage (BDP Policy TP30). However, it is important to ensure that achieving higher density development does not compromise space standards and living conditions for residents.

3.5 The PPG states that ‘*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’*.

3.6 A review of recently permitted development between has, therefore, been undertaken to understand the current type of units being built within the city and to understand what implications may arise as a result of seeking to introduce the NDSS.

3.7 Gross Internal Area (GIA) of dwellings were derived from floorplans and information submitted as part of planning applications. The NDSS indicates that ceiling height and built in storage should be taken into account, but due to resource implications, this was not assessed. The results of this are summarised in Tables 1 and 2 below. To ensure a representative sample, sites from each part of the city (North West, South, East and City Centre), across the different CIL value zones, comprising minor residential schemes (below 10 dwellings); small scale major schemes (10-49 dwellings) and large scale major schemes (50+ dwellings) were studied. In total, 3,849 dwellings within 54 schemes were measured and analysed. Permissions were granted between July 2016 and June 2019.

 Table 1: Assessment of permissions by type, area and compliance with NDSS

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Scheme (PA Ref)** | **Type** | **Area** | **Total number of dwellings** | **% of fully compliant dwellings** **within scheme** | **% deviation of non-compliant dwellings within scheme**  |
| 2017/08883/PA | Large Scale | North West | 110 | 100 | N/A |
| 2017/01495/PA | Large Scale | North West | 139 | 9.4 | 0.6 – 30.1 |
| 2018/01601/PA | Large Scale | City Centre | 258 | 9.7 | 1 – 10.4 |
| 2017/03355/PA | Large Scale | City Centre | 214 | 100 | N/A |
| 2017/07207/PA | Large Scale | City Centre | 389 | 98.2 | 1.4 |
| 2017/09461/PA | Large Scale | City Centre | 326 | 100 | N/A |
| 2017/10448/PA | Large Scale | City Centre | 238 | 68.1 | 2.6 – 31.8 |
| 2016/09139/PA | Large Scale | South | 229 | 40.2 | 0.8 – 2.8 |
| 2017/07621/PA | Large Scale | South | 212 | 100 | N/A |
| 2018/04103/PA | Large Scale | South | 210 | 55.7 | 0.5 – 10.5 |
| 2015/10025/PA | Large Scale | East | 201 | 29.4 | 1.0 – 19.7 |
| 2017/07055/PA | Large Scale | East | 54 | 0 | 3.7 – 11.8 |
| 2018/02828/PA | Large Scale | East | 124 | 91.9 | 16.7 – 22.4 |
| 2017/07024/PA | Large Scale | East | 233 | 94.8 | No NDSS  |
| 2018/07578/PA | Large Scale | East | 161 | 100 | N/A |
| 2017/01428/PA | Small-Scale Major | North West | 20 | 65 | 18.9 |
| 2016/08631/PA | Small-Scale Major | North West | 8 | 0 | 0.8 – 14.7 |
| 2018/05145/PA | Small-Scale Major | North West | 15 | 100 | N/A |
| 2018/08269/PA | Small-Scale Major | North West | 10 | 50 | No NDSS  |
| 2016/09866/PA | Small-Scale Major | North West | 12 | 100 | N/A |
| 2016/10371/PA | Small-Scale Major | City Centre | 10 | 60 | 5.2 – 17.4 |
| 2017/00544/PA | Small-Scale Major | City Centre | 32 | 59.4 | 0.6 – 18.0 |
| 2017/10701/PA | Small-Scale Major | City Centre | 67 | 100 | N/A |
| 2016/10683/PA | Small-Scale Major | City Centre | 146 | 100 | N/A |
| 2018/10092/PA | Small-Scale Major | City Centre | 40 | 95 | 5.7 – 7.1 |
| 2016/09442/PA | Small-Scale Major | South | 12 | 100 | N/A |
| 2016/08455/PA | Small-Scale Major | South | 12 | 0 | 7.9 – 18.1 |
| 2017/07064/PA | Small-Scale Major | South | 12 | 100 | N/A |
| 2017/07682/PA | Small-Scale Major | South | 28 | 42.9 | 11.2 – 23.8 |
| 2017/07628/PA | Small-Scale Major  | South | 12 | 0 | 6.7 - 19 |
| 2016/07628/PA | Small-Scale Major | East | 64 | 1.6 | 7.0 – 7.1 |
| 2017/00077/PA | Small-Scale Major | East | 136 | 83.8 | 0.7 – 10.9 |
| 2017/07927/PA | Small-Scale Major | East | 26 | 80.8 | No NDSS  |
| 2017/07182/PA | Small-Scale Major | East | 5 | 100 | N/A |
| 2018/00037/PA | Small-Scale Major | East | 14 | 0 | 7.1 – 8.9 |
| 2016/08063/PA | Minor | North West | 1 | 0 | 12.9 |
| 2017/07245/PA | Minor | North West | 4 | 0 | 13.8 – 15.4 |
| 2017/02889/PA | Minor | North West | 7 | 85.7 | 0.1 |
| 2017/06546/PA | Minor | North West | 1 | 0 |  No NDSS |
| 2018/02559/PA | Minor | North West | 1 | 100 | N/A |
| 2018/02831/PA | Minor | City Centre | 3 | 33.3 | 7.2 |
| 2018/09611/PA | Minor | City Centre | 1 | 0 | 1.4 |
| 2017/00934/PA | Minor | City Centre | 2 | 0 | 6.4 |
| 2018/08051/PA | Minor | City Centre | 1 | 100 | N/A |
| 2018/02257/PA | Minor | City Centre | 6 | 83.3 | 13.0 |
| 2016/09819/PA | Minor | South | 1 | 100 | N/A |
| 2018/03674/PA | Minor | South | 1 | 100 | N/A |
| 2018/01297/PA | Minor | South | 5 | 100 | N/A |
| 2017/09739/PA | Minor | South | 9 | 100 | N/A |
| 2018/07934/PA | Minor | South | 2 | 100 | N/A |
| 2017/07183/PA | Minor | East | 8 | 100 | N/A |
| 2018/04519/PA | Minor | East | 1 | 100 | N/A |
| 2017/10477/PA | Minor | East | 9 | 11.1 | 7.1 – 24.3 |
| 2019/03200/PA | Minor | East | 1 | 0 | 27.9 |
| 2018/08576/PA | Minor | East | 6 | 50 | 5.7 |

**Key**

% of fully compliant dwellings in scheme % deviation of non-compliant dwellings

 100 -75% of dwellings N/A because 100% compliant

 74 – 50% of dwellings Within 10% below the NDSS

 49% and below More than 10% below the NDSS

No NDSS – No specific standards in the Nationally Described Space Standard for this type of property.

Large scale major = 50+ dwellings

Small scale major = 10-49 dwellings

Minor = 1-9 dwellings

Table 2: Assessment of dwelling types against NDSS

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Type** | **Total Number of dwellings** | **% of dwellings fully compliant** | **% of dwellings within 10% deviation** | **% of dwellings deviating more than 10%** | **No NDSS for specific type of dwellings** | **% deviation of non-compliant dwellings** |
| 1b1p (1s) | 547 | 99.8 | 0.2 | 0 | 0 | 7.2 |
| 1b2p (1s) | 418 | 46.7 | 34.9 | 18.4 | 0 | 23.8 |
| 1b2p (2s) | 64 | 54.7 | 0 | 45.3 | 0 | 15.5 - 32.7 |
| 2b3p (1s) | 505 | 83.6 | 11.9 | 4.6 | 0 | 0.5 - 31.8 |
| 2b3p (2s) | 257 | 49 | 37 | 14 | 0 | 0.6 - 17.1 |
| 2b3p (3s) | 1 | 0 | 0 | 0.0 | 1 | n/a |
| 2b4p (1s) | 429 | 74.1 | 20.5 | 5.4 | 0 | 1.4 - 24.3 |
| 2b4p (1.5s) | 1 | 0 | 0 | 0 | 1 | n/a |
| 2b4p (2s) | 425 | 57.9 | 7.8 | 34.4 | 0 | 0.1 - 19 |
| 2b4p (3s) | 33 | 0 | 0 | 0.0 | 33 | n/a |
| 3b4p (2s) | 179 | 84.9 | 15.1 | 0.0 | 0 | 0.7 - 5.2 |
| 3b4p (3s) | 42 | 69 | 0 | 31 | 0 | 10.4 |
| 3b5p (1s) | 26 | 30.8 | 7.7 | 61.5 | 0 | 1.7 - 11.2 |
| 3b5p (2s) | 315 | 73 | 13 | 14 | 0 | 2.5 - 28 |
| 3b5p (2.5s) | 2 | 0 | 0 | 0 | 2 | n/a |
| 3b5p (3s) | 238 | 87 | 13 | 0 | 0 | 4 - 7.1 |
| 3b6p (1s) | 20 | 100 | 0 | 0 | 0 | 0 |
| 3b6p (2s) | 6 | 66.7 | 33.3 | 0 | 0 | 3.4 - 5 |
| 3b6p (3s) | 40 | 70 | 30 | 0 | 0 | 4.2 - 8.5 |
| 4b5p (2s) | 6 | 100 | 0 | 0 | 0 | 0 |
| 4b6p (2s) | 80 | 57.5 | 42.5 | 0 | 0 | 2.6 - 5.8 |
| 4b6p (2.5s) | 2 | 0 | 0 | 0 | 2 | n/a |
| 4b7p (2s) | 56 | 89.3 | 10.7 | 0 | 0 | 7 |
| 4b7p (3s) | 105 | 56.2 | 21.9 | 21.9 | 0 | 4.6 - 11.7 |
| 4b7p (4s) | 14 | 0 | 0 | 0 | 14 | n/a |
| 4b8p (2s) | 1 | 0 | 100 | 0 | 0 | 0.1 |
| 4b8p (2s + loft space) | 1 | 0 | 0.0 | 0 | 1 | n/a |
| 4b8p (3s) | 8 | 0 | 100 | 0 | 0 | 3.5 |
| 5b8p (2s) | 2 | 100 | 0 | 0 | 0 | 0 |
| 5b8p (3s) | 27 | 100 | 0 | 0 | 0 | 0 |
| 5b9p (3s) | 5 | 0 | 0 | 0 | 5 | n/a |
| **Total** | **3,849** | **71.8** | **15.8** | **11.2** | **1.5** |  |

3.8 Table 5 shows that of the 3,849 dwellings assessed, 71.8% met the relevant standard; 15.8% were within 10% of the standard; 11.2% deviated by more than 10% of the standard and 1.5% did not have a comparative NDSS standard.

3.9 Table 5 also shows compliance against the individual standards set out for each dwelling size in the NDSS. No patterns can be observed in relation to compliance by dwelling type. Overall, there appears to be a range of compliance across the individual types of dwellings.

3.10 It shows that housing delivery in the city over the last few years has been dominated by 1 and 2 bed dwellings, which is consistent with the AMR 2018/19 (see below). Compliance in these dwellings ranges from 99.8% for 1-bed 1-person (1 storey) dwellings to 46.7% in 1 -bed 2-person (1 storey) dwellings. In 3, 4 and 5 bed houses, compliance with the NDSS ranges from 57.5% to 100%.

3.11 Table 4 shows compliance by scheme and scale of application. The percentage of fully compliant dwellings in large scale major schemes was 33.3% compared to 40.2% in small scale major schemes and 41.4% in minor schemes.

3.12 Smaller dwellings have constituted a high proportion of new build dwellings in Birmingham.

Between 2011 /12 and 2018/19, 30% of all new build residential development in the city comprised of 1 bed dwellings and 38.4% were 2 bed dwellings. The majority of these were flats. (See Tables 3 and 4 below extracted from the AMR 2018/19). This trend is likely to continue based on the sites identified in the Strategic Housing Land Availability Assessment (SHLAA 2019). However, an increased amount of larger family sized housing is expected to come forward over the plan period as the Langley Sustainable Urban Extension and other non-city centre sites start to deliver. (See Tables 5 and 6 below extracted from SHLAA 2019).

Table 3: Completions\* by Number of Bedrooms (City wide Gross)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Year** | **1 bed** | **2 bed** | **3 bed** | **4+ bed** | **Total** |
| 2011/12 | 333 | 546 | 278 | 327 | 1,484 |
| 2012/13 | 283 | 562 | 250 | 335 | 1,430 |
| 2013/14 | 331 | 785 | 342 | 265 | 1,723 |
| 2014/15 | 367 | 721 | 529 | 449 | 2,066 |
| 2015/16 | 548 | 740 | 349 | 370 | 2,007 |
| 2016/17 | 527 | 644 | 374 | 263 | 1,808 |
| 2017/18 | 991 | 1,242 | 478 | 320 | 3,031 |
| 2018/19 | 1,847 | 1,441 | 305 | 272 | 3,865 |
| **Total** | 5,227 | 6,681 | 2,905 | 2,601 | 17,414 |
| **%** | **30** | **38.4** | **16.7** | **14.9** | **100** |

\* Excludes student accommodation, HMOs and conversions

Table 4: Completions\* by Dwelling Type (Gross)

|  |  |  |  |
| --- | --- | --- | --- |
| **Year** | **Houses** | **Apartments** | **Total** |
| 2011/12 | 803 | 603 | 1,406 |
| 2012/13 | 891 | 407 | 1,298 |
| 2013/14 | 851 | 716 | 1,567 |
| 2014/15 | 1,364 | 438 | 1,802 |
| 2015/16 | 996 | 280 | 1,276 |
| 2016/17 | 874 | 934 | 1,808 |
| 2017/18 | 1,136 | 1,895 | 3,031 |
| 2018/19 | 753 | 3,112 | 3,865 |
| **Total** | **7,668** | **8,387** | **16,055** |

\* Excludes student accommodation, HMOs and conversions

Table 5: Status by Distribution

|  |  |
| --- | --- |
| **Status** | **Location[[6]](#footnote-6)** |
|  | **North****West** | **East** | **South** | **City Centre** | **Total** |
| Under Construction | 516 | 1,037 | 2,090 | 6,760 | 10,403 |
| Detailed PP | 2,267 | 588 | 710 | 4,503 | 8,068 |
| Outline PP | 1,008 | 297 | 260 | 500 | 2,065 |
| Permitted Development | 10 | 314 | 115 | 330 | 769 |
| Allocation in adopted plan | 5,154 | 621 | 390 | 1,672 | 7,837 |
| Allocation in draft plan | 0 | 251 | 0 | 0 | 251 |
| Other Opportunity in BDP Growth Area | 2,095 | 272 | 5 | 4,840 | 7,212 |
| Other Opportunity not in BDP Growth Area | 761 | 2,634 | 2,316 | 0 | 5,711 |
| **Total** | **11,811** | **6,014** | **5,886** | **18,605** | **42,316** |

 Table 6: Time Period by Distribution

|  |  |
| --- | --- |
| **Time Period** | **Location** |
|  | **North west** | **East** | **South** | **City Centre** | **Total** |
| Within 5 years | 2813 | 1873 | 2916 | 10835 | 18437 |
| 6 to 10 years | 5592 | 3398 | 2586 | 4170 | 15746 |
| Beyond 10 years | 3406 | 743 | 384 | 3600 | 8133 |
| **Total** | **11811** | **6014** | **5886** | **18605** | **42316** |

3.13 Given the current development trend in the city for 1 and 2 bedroom flats, the sites that are expected to come forward over the plan period (SHLAA 2019) and the findings above which shows a varied level of compliance across the dwellings types, the City Council believes there is a strong case for adopting the NDSS to ensure that all new dwellings will provide an appropriate amount of space to help contribute to health and welling.

3.14 While the majority (71.8%) of units are already being designed to accord with the space standards, 27% of units (1,040 dwellings) fell below the standard. Of this number, 41.3% fell more than 10% below the standard. This may be due to the lack of policy in relation to space standards currently or other site-specific reasons. It is considered that Policy DM10 provides sufficient flexibility to allow for exceptions to be considered.

3.15 Given that at least 51,100 new dwellings will be delivered in Birmingham, over the plan period, this pattern could result in around 13,700 non-NDSS compliant dwellings being delivered. Adoption of the NDSS will help to ensure that new development is of sufficient size and make a positive contribution to the health and wellbeing of residents.

3.16 Beyond the specifics of the size and type of dwellings currently being built in the area, the social benefits of adopting the NDSS were outlined in the Housing Standards Review Final Implementation Impact Assessment (March 2015):

* Improved cohesion within family units - evidence gathered in support of the London Plan requirement for space standards identifies a range of benefits that families derive from good standards of space in the home. These include better ability to socialise with family members and guests; improved storage; improved space for solitary activities; greater flexibility in arranging rooms to meet different preferences; the ability to work from home; more space for managing waste and recycling and improved day light and ventilation.
* General Health and Wellbeing - space standards help to mitigate impacts from overcrowding, particularly relating to mental health (reducing depression), giving children room to play within the home and helping to ensure a good night’s sleep.
* Reducing the risk of market failure -the UK builds some of the smallest homes in Europe, and there is a long-term downward trend in the size of new homes in the UK. There are concerns as to the longevity of smaller housing where these are crammed on to sites and address only a narrow segment of the marketplace, because having a narrow market appeal increases the risk that these homes will be less desirable in the longer term. Space Standards provide one approach to offsetting these risks.
* Reducing Anti-Social Behaviour - poor internal space is linked to poorer health and lower educational attainment. It is also suggested that where there is insufficient space for adults and younger family members to inhabit a property comfortably, there are increased risks of children and young adults being displaced into the external environment where they are more vulnerable to falling into patterns of anti-social behaviour.
* Adaptability and Inclusion - internal space is a key criterion in relation to how accessible a home is, and how capable it will be to adapt to a range of changing household needs over time. Where people suffer permanent or temporary impaired mobility, larger floor plates offer inherently greater potential for adaptation to meet specific needs.

3.17 Further to this a recent appeal decision indicates that the authority would benefit from the introduction of the NDSS, both in terms of achieving a good standard of living and avoiding the unnecessary costs associated with the appeal process on the basis of ambiguous interpretations of policy.

3.18 While this appeal decision relates to a change of use (APP/P4605/W/19/3222566) from B1 (offices to) to 13 no.1 bed affordable housing flats (C3 residential) at 87 Bracebridge Street, Birmingham, B6 4PJ. The inspector noted that:

 *“8. Birmingham City Council has not adopted the Technical housing standards – nationally described space standard (the NDSS). However, the NDSS indicates that for one bedroomed flats there should be a minimum of 37 sqm of gross internal floor area and storage. There is no standard set out for studio flats. I do though attach significant weight to the NDSS as a guide.*

*9. The flats are very small and less than half the minimum space standard for a*

*one bedroomed flat set out in the NDSS. From my observations, the flats were*

*extremely cramped with little room for storage, cooking and preparing food and*

*for sitting. The space required for opening the door of the flat, severely*

*constrains the usability of the internal floor space.”*

**Viability**

* 1. The PPG states that ‘*the impact of adopting the space standard should be considered as a*

*part of the plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted’*.

* 1. A Financial Viability Assessment (FVA) (November 2019) (EBDXX) prepared by BNP

Paribas has been undertaken in line with the NPPF. The FVA assessed the requirements set out in the publication version of the ‘Development Management in Birmingham: Development Plan Document (October 2019) alongside the policy requirements in the adopted Birmingham Development Plan (January 2017). The study assesses at high level the viability of development typologies representing the types of sites that are expected to come forward over the plan period and tested the cumulative impact of policy requirements envisaged for specific sites.

* 1. For the purposes of testing viability BNP Paribas Real Estate adopted the standard

house/apartment sizes set out in Tables 7 and 8 below in each of the site typologies that were tested.

 Table 7: Standard housing sizes used in viability testing in the Viability Assessment

|  |  |  |
| --- | --- | --- |
| **No. of Beds** | **Size (sq.m)** | **Size (sq. ft)** |
| 1 bed 2 person (two storey) | 58 | 540 |
| 2 bed 4 person (two storey) | 79 | 750 |
| 3 bed 5 person (two storey) |  93  | 1,001 |
| 4 bed 6 person (two storey) | 106 | 1,259 |

Table 8: Standard apartment sizes used in viability testing in the Viability Assessment

|  |  |  |
| --- | --- | --- |
| **No. of Beds** | **Size (sq.m)** | **Size (sq. ft)** |
| 1 bed 2 person (one storey) | 50 | 540 |
| 2 bed 4 person (one storey) | 70 | 750 |

3.22 The construction costs employed in the study reflect the figures presented in Tables 7 and 8 above and were based on the principle of adopting the space standards in Birmingham. Based on house price and sales data, the FVA identifies a range of average sales values across the city (£2,500 to £4,200 per square metre), with highest values in the centre of the city.

3.23 The costs of implementing the space standards are included within the ‘baseline’ position on the FVA. The FVA then undertakes economic profiling and sensitivity analysis, demonstrating how development viability will change depending on economic cycles. The current assessment levels (base position) used as the basis for the policy consideration represent a reasonable moderate to low position within the economic cycle.

3.24 The viability and policy impacts of the wide range of viability testing undertaken by BNP Paribas Real Estate are set out in detail in Section 4 of the Viability Assessment. In conclusion, it notes that the viability of an individual development very much depends upon the specific site circumstances. However, based upon the wide range of testing undertaken, the FVA concludes that the developments will be viable in the city with the NDSS in place. In many cases, the space standards proposed do not differ markedly from unit sizes already delivered by the market and consequently there is no additional ‘burden’ upon development viability.

3.25 Based on the findings, the Council consider there to be a strong case on viability grounds for adopting the space standards. The fact that the majority of residential units already comply with, or are close to, the NDSS adds weight to the conclusion that the introduction of a minimum space standard does not have a notable impact on scheme viability. This reflects market demand for unit sizes that are aligned with those in the NDSS; developments which meet these standards are likely to be more attractive to purchasers in comparison to smaller units. Units built to the NDSS standards are also more likely to be capable of being used more flexibly than would be the case for smaller units (e.g. two bed apartments that meet the NDSS standards can be used to accommodate families, or alternatively can be used for rented housing by sharers). Flexibility of use is likely to enhance demand for the completed housing units, which in turn will improve velocity of sale and reduce finance costs over a development period.

* 1. Affordable housing stock in the city is already built to a standard equivalent to the

NDSS as this is the preferred approach of the Registered Providers that operate within Birmingham including the Birmingham Municipal Housing Trust (BMHT).

3.27 The PPG also refers to the need to consider any potential impact on meeting demand for Starter Homes to be taken into account. The provision of Starter Homes is less of a financial burden on developers than more traditional forms of affordable housing. As such, in the context of the viability information presented above it is not considered to be a significant impact.

3.28 As part of the review of recently permitted development described in para. 3.7 above, similar scaled schemes were appraised in the four different parts of the city. Some schemes demonstrated more compliance than others within a similar location and scale of development. Schemes with a high level of compliance was found in all parts of the city. It proceeds that the standard is capable of being met across the city and that the size and type of dwellings currently being delivered confirms this.

**Timing**

3.29 The PPG states 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’*.

3.30 As set out above, there are no notable viability impacts anticipated from the introduction of the NDSS and the majority of permitted/emerging schemes within the last three years have sought to meet, or come close to, the national standards of their own accord.

* 1. It should also be noted that the intention to introduce a space standard was first suggested in the Consultation Document which was consulted on in September – October 2015.

Subsequently, the intent to introduce the standard has been in the public domain for over 4 years and by the time of adoption of the DMB, this period will have surpassed five years.

* 1. In light of the findings above, it is not proposed to allow for a transitional period before adoption of a new policy on space standards but rather seek to adopt and implement the policy alongside the other policies within the DMB document.

**4. Building Regulations M4 (2) Category 2 Standard Evidence**

4.1 The PPG suggests that local authorities consider the following when determining whether to introduce the optional accessibility requirements:

* 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; and
* the overall impact on viability.

 **The need for housing for older and disabled people**

4.2 Across the UK, the demographic reality is that more and more people are living longer. Birmingham is following the national trend, and it is predicted that the percentage of those aged over 65 within Birmingham will increase from 13.1% (147,900) in 2019 to 15.1% (188,500) in 2031. This represents an increase of 26% (38,900) in the additional number of older people between 2019 to 2031.[[7]](#footnote-7) ONS’ 2014-based household projections show that by 2039, 30% of total households will be headed by a person aged 65 years and older compared with 22.6% in 2011, an increase of 7.4%.

4.3 Birmingham’s Joint Strategic Needs Assessment captures important information about older people’s housing, health and wellbeing and sets the baseline from which local demand profiling of the city’s older community and their service needs must be drawn from. The ‘Older Adults Profile with Adult Social Care Outcomes Framework and Public Health Outcomes Framework’ report[[8]](#footnote-8) forms part of the JSNA. Outcome frameworks are a collection of indicators to provide an understanding of how well public health is being improved and protected.

4.4 The report highlights the life expectancy and healthy life expectancy of males and females in Birmingham as being much lower than the national average. Life expectancy for a man in Birmingham is 77.2 years compared to 79.5 years for England. Females in Birmingham can expect to live to 81.9 years compared to 83.1 years for England.

4.5 Healthy life expectancy is the number of years a person can expect to live in good health. Healthy life expectancy in Birmingham is much lower than the national average with men in Birmingham expecting to live only 50 years in good health compared to 63 years nationally. For women in Birmingham this is 59 years, compared to 64 years nationally. The gap between healthy life expectancy the older population shows that people will be spending more years in poor health and provides an estimate of how many years a person will be in need of health and social care.

4.6 Despite increasing life expectancy, there remains a significant gap in healthy life expectancy. This in turn presents a series of health and care challenges for older people and people with mobility impairments as it means they will be living longer with impairments and life-limiting conditions. This also impacts on the immediate and wider family and regular visitors who provide support and care.

4.7 If trends in healthy life expectancy continue as they are and population projections for older people continue as expected, we are likely to see considerable and potentially unsustainable demands for adult health and social care services in the future. The report concludes that it is therefore important to prevent care needs from arising, as well as managing these needs when they do arise.

4.8 Government statistics show that the prevalence of disability rises with age. Around 6% of children are disabled, compared to 16% of working age adults and 45% of adults over State Pension age.[[9]](#footnote-9) Based on these prevalence figures, the additional population aged over 65 by 2031 could result in an additional 16,800 people aged over 65 with a disability.

4.9 It is acknowledged that not every older person or household will translate into a need for an accessible and adaptable home. The evidence, therefore, also looks at the health of older people (using POPPI data) to provide an indication of need for accessible and adaptable homes. However, it is not only older people that will benefit from accessible and adaptable homes, but also those who have a limiting long-term illness or disability (LLTID). A LLTID is defined in the Census as that which limits a person’s day to day activities, and has lasted or is expected to last, at least 12 months.

4.10 The table below shows the number of working age population and pensioners with a LLTID who are living in residential households. While there are no projections for individuals with LLTID, it is safe to assume that the projected population will include people under the age of 65 with LLTID.

 Table 9: Limiting long-term illness or disability, Census 2011

|  |  |  |
| --- | --- | --- |
|  | **All people** | **65+** |
| **Area** | **Total** | **Limited a Lot** | **Limited a Little** | **Not****Limited** | **Total** | **Limited a Lot** | **Limited a Little** | **Not****Limited** |
| Birmingham | 1,051,366 (100%) | 93,508 (8.9%) | 97,762 (9.3%) | 860,096 (81.8%) | 133,962(100%) | 43,188(32.2) | 36,597(27.3%) | 54,177(20.4%) |
| England | 52,059,931 (100%) | 4,098,808 (7.9%) | 4,838,146 (9.3%) | 43,122,977 (82.8%) | 8,343,008 (100%) | 2,085,119(25%) | 2,212,81326.5%) | 4,405,076(48.5%) |

4.11 The Census 2011 also recorded the number of people who provide unpaid care. The provision of unpaid care is assumed to take place in either the dwellinghouse of the person given care or the dwellinghouse of the carer if they live with the person being cared for (rather than a care home or specialist accommodation). In either case, the provision of accessible and adaptable homes is considered to be important to ensure people can either continue to live independently or in suitable accommodation with their carer. A total of 107,380 people in Birmingham provided unpaid care (1-50+ hours) to someone else.[[10]](#footnote-10)

4.12 POPPI[[11]](#footnote-11) and PANSI[[12]](#footnote-12) provide particularly useful information on future changes in the characteristics of the population with regards to age and disability. In terms of older persons, the POPPI database (2019) suggest that for Birmingham:

* There will be an increase in the number of people aged 65+ from 13% of the total Birmingham population in 2019 to 14.5% in 2030. This represents a 15.5% increase.
* In terms of those 65+, there is predicted to be 47,142 people with a limiting long-term illness whose day-to-day activities will be limited a little and 55,730 people whose day-to-day activities will be limited a lot by 2030. This represents an increase of 19.6% from the 2019 baseline.
* By 2030, it is suggested that 33,429 people aged 65+ will not be able to manage at least one activity on their own and 56,616 people who need help with at last one self-care activity.
* A large number of older people also act as a carer to a partner, family member or other person. There is predicted to be a 20% increase in people aged 65+ providing unpaid care.

Table 10: POPPI Data for Birmingham – Projected population aged 65 and over with LLTID

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | **2019** | **2020** | **2025** | **2030** | **2035** |
| Total Birmingham population | 1,156,200 | 1,164,400 | 1,201,900 | 1,239,400 | 1,274,200 |
| Population aged 65 and over | 150,200 | 151,600 | 162,500 | 179,600 | 196,700 |
| Population aged 65 and over with a limiting long-term illness (LLTI) whose day-to-day activities are limited a little | 39,429 | 39,786 | 42,703 | 47,142 | 51,511 |
| Population aged 65 and over with a limiting long-term illness (LLTI) whose day-to-day activities are limited a lot | 46,588 | 47,028 | 50,611 | 55,730 | 61,426 |

Table 11: PANSI Data for Birmingham - People aged 18-64 predicted to have impaired mobility and have a moderate or severe learning disability and be living with a parent

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | **2019** | **2020** | **2025** | **2030** | **2035** |
| Total Birmingham population | 1,156,200 | 1,164,400 | 1,201,900 | 1,239,400 | 1,274,200 |
| Total population aged 18-64 predicted to have impaired mobility | 32,517 | 32,911 | 34,424 | 34,929 | 35,019 |
| Total population aged 18-64 with moderate or severe learning disability predicted to be living with a parent | 70,078 | 69,905 | 70,106 | 71,777 | 72,665 |

* There is predicted to be a 7.4% increase in people aged 18-64 having impaired mobility.
* In addition, there is predicted to be a 3.7% increase in people aged 18-64 with a moderate or severe learning disability living with a parent.
* These groups will account for 8.6% of the total Birmingham population. As well as older people, it is likely that these people will benefit from accessible and adaptable homes.
* Overall, those aged 65+ with a LLTID (limited a lot and a little) and those aged 18-64 with impaired mobility or with a learning disability living with a parent will comprise 17% of the total Birmingham population.

4.13 Building accessible housing can make a substantial difference to quality of life, whether you need support yourself or are caring for someone else. The wider benefits of delivering accessible and adaptable housing are improving the quality of life for residents now and ensuring that future need is met.

4.14 A Part M4(2) accessible and adaptable dwelling will be designed with particular attention to circulation within the home and external routes to transport infrastructure. Pathways, hallways, stairways and access to floors above, doorways and spaces to approach and reach essential facilities and controls in the home will be taken into consideration. Integral design features are ready to assist adaptation for households that have a family member with a temporary or permanent disability or a progressive condition that is making movement around the homes or between floors difficult.

4.15 Research underpinning the Lifetime Homes (now Part M4(2) accessible and adaptable dwelling) principles highlighted the long-term value of providing high quality housing specifically designed for older people as it is this age group that has higher levels of mobility and other health related issues. The provision of housing for older and less mobile people includes potential saving through:

* Reducing the risks of falls;
* Protecting against the effects of cold homes and fuel poverty;
* Enabling earlier discharge from, and fewer readmissions to hospital;
* Preventing the need (both temporary and permanent) for institutional residential care; and
* Reducing ill health costs associated with isolation and loneliness.

4.16 In Birmingham the general health of the population is worse than the England average. Specific local priorities for Birmingham identified by Public Health include addressing local health inequalities by improving health and wellbeing[[13]](#footnote-13). From the evidence available it is clear that the quality of new housing in the city (including implementation of the internal space and access standards) has a role to play in addressing these priorities and meeting Council objectives.

**Size, location, type and quality of dwellings needed to meet specifically evidenced needs**

4.17 The Strategic Housing Market Assessment (SHMA) (2013) underpinning the housing mix in the BDP did not breakdown the housing needs into a specific number of dwellings for older and disabled people. The need was expressed by tenure and size (number of bedrooms). A summary table of the appropriate proportionate mix of housing as set out in the SHMA is included on page 113 of the BDP. The SHMA identifies a need for new dwellings across all sizes but a greater need for larger dwellings (by number of bedrooms) and notes that high proportions of 3 and 4 person households are inadequately housed[[14]](#footnote-14).

Table 12: Birmingham Development Plan / Strategic Housing Market Assessment 2013

|  |  |
| --- | --- |
| **Tenure** | **% of Dwellings** |
| **1 Bed** | **2 Bed** | **3 Bed** | **4+ Bed** | **Total** |
| Market | 8.1 | 14.9 | 17.3 | 21.9 | 62.2 |
| Shared ownership | 1.1 | 1.2 | 2.2 | 0.3 | 4.8 |
| Affordable rent | 3.7 | 11.6 | 5.3 | 0.9 | 21.6 |
| Social rent/ requires subsidy\* | 1.7 | 3.0 | 1.6 | 5.0 | 11.4 |
| **%** | **14.6** | **30.8** | **26.3** | **28.1** | **100** |

4.18 Increasing the amount of general housing that is suitable for older and less able people together with more specialist housing, can have the added benefit of freeing up larger homes in communities that are required by families, of which there is a high level of need for.

**The accessibility and adaptability of existing housing stock**

4.19 The English Housing Survey 2014-15[[15]](#footnote-15) provides a useful general picture of the accessibility of the existing housing stock across England. The key relevant findings were:

* In 2014-15, 9% of all households in England had one or more people with a long-term limiting disability that required adaptations to the home. This has not change since 2011-12.
* In 2014-15, one in ten households (10%) that included a person with a long-term disability requiring adaptations wanted to, or were trying to, move somewhere more suitable for their needs.
* Less than one in ten homes (7%) had all four accessibility features that provide visitability: level access to the entrance, flush thresholds, sufficiently wide wide doorsets and circulation space, and a toilet at entrance level. Around two thirds (64%) of homes had a toilet at entrance level but the presence
* Almost three quarters (72%, around 15.7 million) of all the homes that lacked full visitability could be adapted to provide all these four features, but this was not feasible in the remaining 6.0 million (28%) homes.
* Terraced houses were the most likely dwelling type to be not feasible to be made fully visitable (50%) compared with flats (27%), and other houses (semi- detached, 15% and detached, 14%).
* Over half of homes built before 1919 were not feasible to be made fully visitable (55%). Homes built from 1919 onwards tended to need moderate work to ensure full visitability.
* Owner occupied and private rented housing is generally the least accessible.
* Housing association properties are the most likely to possess all four visibility features (generally due to the newer age of these properties).

4.20 The survey gives a broad indication of the accessibility and adaptability of housing stock across the country and highlights that the accessibility and adaptability of the existing housing stock is generally quite poor, particularly in older properties. Census 2011 data shows that 29.5% of Birmingham’s housing stock comprised of a higher than national average (24.6%) of terraced housing compared which is older and consequently more difficult to adapt.

4.21 The 2018/19 survey[[16]](#footnote-16) showed that over half of households in the social rented sector had one or more household member with a LLTID (53%). For private renters, this figure was just over one quarter (27%). While a similar proportion of owner-occupied households had one or more household members with a LLTID (31%) reflecting their older age profile.

4.22 While the development of specialist housing for older people is a growing sector, the majority of older people will continue to live outside of specialist housing. Given the significant projected increase in the elderly population, opportunities should therefore be taken to ensure that mainstream housing provides for their needs.

4.23 The Birmingham Municipal Housing Trust (the City Council’s housing development arm) builds all of its properties (both private and affordable) to Part M4 (2) standard.

 **How needs vary across tenures**

4.24 It is not considered that the need for accessible and adaptable dwellings differs significantly across tenures. Owner-occupied dwellings tend to have a higher aged household profile than other tenures in Birmingham, but all tenures will experience an increase in their age profile in years to come.

4.25 The City Council’s Housing Register provides a useful picture of current needs in the affordable sector. At July 2019, there were 894 active applications with adaptation requirements. The range of adaptations required include wheelchair access, wider doorways, ramped/ level access from external, through floor lift, ceiling track hoist, lowered kitchen facilities, accessible bathing facilities, level access internal layout and stair lift. This number accounts for 7% of those in total on the housing register (12,911 applications at 29 July 2019).

4.26 Additionally, 2011 Census Data shows a higher proportion of people with a LLTI who are owner occupiers compared to those in social rented sector and private rented sector accommodation, which reinforces the need to ensure that all housing seeks to provide a proportion of dwellings that are accessible and adaptable.

Table 13: % Population (all) living in households with a LLTID, by tenure, Census 2011

|  |  |  |  |
| --- | --- | --- | --- |
| **Tenure** | **Limited a lot** | **Limited a little** | **Not limited** |
| Owned outright | 36.3 | 37.7 | 19.9 |
| Owned with mortgage/ shared ownership | 17.5 | 22.8 | 39.7 |
| Social rented | 34.9 | 27.3 | 19.4 |
| Private rented | 11.2 | 12.1 | 21.0 |

**Viability**

4.27 The Council commissioned BNP Paribas Real Estate UK to undertake a full plan Financial Viability Assessment (FVA) of the Publication version DMB. The FVA has informed the development of the Publication version of the DMB, including Policy DM10: Standards for Residential Development.

4.28 The FVA details the site appraisal methodology in full, including the full range of residential

development scenarios that were tested and employed to ensure that the policies proposed in the plan would not cumulatively threaten the ability for sites to be developed viably. The FVA included an additional amount of £521 per house and £921 per flat to the build costs to meet the access requirement set out in Policy DM10. As such the viability of Policy DM10 has been fully assessed in line with the NPPF and is considered to be viable.

**5. Conclusions**

5.1 The evidence in this paper also suggests that the optional space standards could be justified in Birmingham due to findings from viability testing and a review of recent permissions. The key findings are:

* While the majority (71%) of units are already being designed to accord with the space standards; 27% of units have been found to fall below the standard. Of this number, 41.3% fell more than 10% below the standard. Given that at least 51,100 new dwellings will be delivered in Birmingham over the plan period, this pattern could result in around 13,700 non-NDSS compliant dwellings being created.
* The current development trend in the city for 1 and 2 bedroom flats, the sites that are expected to come forward over the plan period (SHLAA 2019) and the varied level of compliance across dwelling types, demonstrates a case for adopting the NDSS to ensure that all new dwellings coming forward will provide an appropriate amount of space to help contribute to health and welling.
* The Financial Viability Assessment of the DMB (November 2019) demonstrates that the introduction of the space standards should not have any significant impact on the viability of delivering housing in the city.

5.2 The evidence also suggests that the optional building regulations M4(2) for accessible and adaptable homes could be justified in Birmingham due to the ageing population and the projected increase in the number of people with long term health problems and disability. This will lead to an in increase in the need for housing suitable for older people and people with mobility impairments. The key evidence is that:

* The housing stock in Birmingham tends to be older, which means that it will be more difficult and more expensive to adapt.
* Social care and public health strategies in Birmingham are placing more emphasis on supporting people in their own homes.
* There are well acknowledged links between health and housing. Accessible and adaptable homes can help to prevent health issues and enable people to live independently for longer as well as being better cared for in their home.
* 31% of owner-occupied households had one or more household members with a LLTID (English Housing Survey 2018-19)
* Census 2011 data shows that 18.2% of all people living in residential households in Birmingham, including those aged 65+ had a LLTHID. While there are no projections for individuals with LLTID, it is safe to assume that the projected population will include people with LLTID.[[17]](#footnote-17)
* Birmingham’s older (65+) population makes up 13.1% of the total Birmingham population[[18]](#footnote-18). Population forecasts show that there will be an additional 38,900 (26%) older people by 2031 resulting in this group accounting for 15.1% of the population in 2031.[[19]](#footnote-19)
* By 2039, 30% of total households in Birmingham will be headed by a person aged 65 years and older compared with 22.6% in 2011, an increase of 7.4%.[[20]](#footnote-20)
* Of those aged 65 and over there is predicted to be 102,872 people whose day to day activities will be limited a little and a lot by 2030, accounting for 8.3% of total projected population. This represents a 19.6% increase from the 2019 baseline.[[21]](#footnote-21)
* There is also predicted to be a 7.4% increase in people aged 18-64 having impaired mobility and a 3.7% increase in people aged 18-64 with a moderate or severe learning disability living with a parent by 2030. These groups will account for 8.6% of the total Birmingham population. As well as older people, it is likely that these people will benefit from accessible and adaptable homes.
* The Financial Viability Assessment of the DMB (November 2019) demonstrates that a requirement for 30% of dwellings on sites of 15 dwellings or more should not have any significant impact on the viability of delivering housing in the city.

5.3 In conclusion, the Council considers that appropriate justification has been provided for inclusion of the access and space standards within the emerging DMB and that the requirements of NPPF and the PPG have been met

**Appendix 1: Technical Housing Standards - Nationally Described Space Standard (March 2015 as updated)**

Table 1 - Minimum Gross Internal Floor Areas (GIA) and Storage

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Number of bedrooms** | **Number of bedspaces** (people) | **1 storey****Dwellings**(sq.m.) | **2 storey****Dwellings** (sq.m.) | **3 storey****Dwellings** (sq.m.) | **Built-in storage\*** (sq.m.) |
| 1 | 1 | 39 (37)\*\* | n/a | n/a | 1 |
| 2 | 50 | 58 | n/a | 1.5 |
| 2 | 3 | 61 | 70 | n/a | 2 |
| 4 | 70 | 79 | n/a |
| 3 | 4 | 74 | 84 | 90 | 2.5 |
| 5 | 86 | 93 | 99 |
| 6 | 95 | 102 | 108 |
| 4 | 5 | 90 | 97 | 103 | 3 |
| 6 | 99 | 106 | 112 |
| 7 | 108 | 115 | 121 |
| 8 | 117 | 124 | 130 |
| 5 | 6 | 103 | 110 | 116 | 3.5 |
| 7 | 112 | 119 | 125 |
| 8 | 121 | 128 | 134 |
| 6 | 7 | 116 | 123 | 129 | 4 |
| 8 | 125 | 132 | 138 |

\* The built-in storage figures are included within the GIAs (i.e. are not additional)

\*\* Where a studio has a shower room instead of a bathroom, the floor area may be reduced from 39m2 to 37m2, as shown bracketed.

The Standard requires that:

1. the **dwelling** provides at least the GIA and built-in storage area set out in Table 1
2. **a dwelling** with two or more bedspaces has at least one double (or twin) bedroom
3. in order to provide one bedspace, a **single bedroom** has a floor area of at least 7.5 sq.m. and is at least 2.15m wide
4. in order to provide two bedspaces, a **double (or twin) bedroom** has a floor area of at least 11.5 sq.m.
5. **one double (or twin) bedroom** is at least 2.75m wide and **every other double (or twin) bedroom** is at least 2.55m wide
6. **any area with a headroom of less than 1.5m** is not counted within the GIA unless used solely for **storage** (if the area under the stairs is to be used for storage, assume general floor area of 1sq.m within the GIA)
7. any other area that is used solely for **storage** and has a headroom of 900-1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all
8. a **built-in wardrobe** counts towards the GIA and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72 sq.m. in a double bedroom and 0.36sq.m in a single bedroom counts towards the built-in storage requirement
9. the **minimum floor to ceiling height** is 2.3m for at least 75% of the GIA

Compliance

All areas are to be denoted in square metres (sq.m) and all linear dimensions in metres (m). Developers are to provide a schedule of dwelling types indicating their overall GIA and in-built storage areas.

Developers will be able to achieve ‘type approval’ for standardised designs. (Note that internal floor plans will still normally need to be submitted in order to assess amenity impacts and to demonstrate compliance with design principles such as active frontages, natural surveillance and the 45 degree code). For dwellings without type approval, drawings will need to be submitted at a scale of no greater than 1:100 showing room dimensions and heights for plan checking purposes

The City Council will accept type approval of plans where this is confirmed by a building control body (which can be either a Local Authority Building Control Body, or a Government Approved Inspector) providing that the information used to assess compliance is also submitted, to enable checking by the City Council.

If the proposed development does not comply with the Standard, room floor plans with indicative furniture layouts will be required to demonstrate the functionality of internal spaces.

1. Department of Communities and Local Governments (DCLG)

<https://www.gov.uk/government/speeches/planning-update-march-2015> [↑](#footnote-ref-1)
2. <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard> [↑](#footnote-ref-2)
3. <https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m> [↑](#footnote-ref-3)
4. Birmingham City Council Plan 2018-2022 <https://www.birmingham.gov.uk/downloads/file/10257/birmingham_city_council_plan_2018-2022> [↑](#footnote-ref-4)
5. Space standards for homes, RIBA (December 2015) [↑](#footnote-ref-5)
6. Administrative boundaries used by the Planning and Regeneration Area Teams. See map at appendix A8 in SHLAA 2019. [↑](#footnote-ref-6)
7. ONS 2014 sub national population projections [↑](#footnote-ref-7)
8. Birmingham JSNA 2018/19 Older Adults Social Care Outcomes Framework [↑](#footnote-ref-8)
9. Family Resources Survey 2010/11 statement taken from https://www.gov.uk/government/publications/disability-facts-and-figures/disability-facts-and-figures#fn:3 [↑](#footnote-ref-9)
10. Census 2011 [↑](#footnote-ref-10)
11. Projecting Older People Population Information System, 2019 data www.poppi.org.uk [↑](#footnote-ref-11)
12. Projecting Adult Needs and Service Information System, 20139 data www.pansi.org.uk [↑](#footnote-ref-12)
13. Health Profile for the Birmingham published by Public Health England (3 July 2018) [↑](#footnote-ref-13)
14. Birmingham Strategic Housing Market Assessment (2013) [↑](#footnote-ref-14)
15. English Housing Survey Headline Report, 2014-15 [↑](#footnote-ref-15)
16. English Housing Survey Headline Report, 2018-19 [↑](#footnote-ref-16)
17. Census 2011 [↑](#footnote-ref-17)
18. Mid-2019 Population estimate [↑](#footnote-ref-18)
19. ONS 2014 sub national population projections [↑](#footnote-ref-19)
20. ONS’ 2014-based household projections [↑](#footnote-ref-20)
21. Projecting Older People Population Information System, 2019 data www.poppi.org.uk [↑](#footnote-ref-21)