South Gloucestershire Council

Internal Space and Accessibility Standards Topic Paper (Feb 2025)

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1. Introduction

1.1 As part of the 2015 Housing Standards Review[1], the government introduced various recommendations, many of which were incorporated into the Building Regulations. However, the introduction of the Technical Housing Standards - Nationally Described Space Standard (NDSS)[2] 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.

1.2 This Internal Space and Accessibility Standards Topic Paper is one in a series of background papers that have been prepared to inform the preparation of the emerging South Gloucestershire Local Plan 2025-2040. It supports the amended Internal Space and Accessibility Standards Policy and provides background information on the need for accessible and adaptable dwellings, including minimum standards for internal dwelling space in South Gloucestershire.

1.3 In developing South Gloucestershire's new Local Plan, there have been a number of public consultations which have asked about the full range of issues associated with how South Gloucestershire develops and grows in the future. One of the policies previously consulted on at Phase 2 related to Urban Lifestyles and Density (the working version of the new Making Effective Use of Land Policy), which in future, will require sites to optimise density. However, optimised and higher density must be balanced with achieving a high quality of life for future residents, considering an aging population and people's needs changing as new technology and working practices come forward during the plan period. As such, the adoption of minimum room sizes for all types of dwellings – updating the current requirement which applies to affordable housing only, is a key policy requirement within the Making Effective Us of Land policy.

1.4 Increasing pressure to deliver homes, means that it is now more important to make effective use of land through higher density developments, which in turn means ensuring that the internal living environment of new homes offers appropriate living standards for everyone.

1.5 The draft policy requirements for the amended internal space and accessibility standards for new dwellings have been included in Appendix 1of this topic paper.

1.6 This paper also reviews the evidence for the Nationally Described Space Standards (NDSS) relating to space standards, and for accessible and adaptable homes for new residential development in South Gloucestershire. Also included is information on whether adoption would result in viability or timing-related consequences for housing delivery. Chapter 4 sets out the information relating to space standards, including the methodology used to assess the various built developments, the analysis of the data collected, and conclusions. The full data table is presented in Appendix 3.

[1] Housing standards review: technical consultation - GOV.UK
[2] Technical housing standards – nationally described space standard

2. Policy context

National policy

2.1 The New Local Plan will be examined under the December 2023 National Planning Policy Framework (NPPF)[3], which includes Paragraph 135 which specifies that planning policies and decisions should ensure that developments create places that are safe, inclusive, accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users. Footnote 52 of the December 2023 NPPF, sets out that policies may make use of the Government's optional technical standards for accessible and adaptable housing and the nationally described space standard (NDSS), where the need for such priorities can be justified.

2.2 Once Adopted, the New Local Plan will also be in conformity with the latest version of the NPPF (December 2024).

2.3 Para 127 of the National Design Guide (Jan 2021) states that where a need is identified, Local Plans may adopt the Nationally Described Space Standards[4], where this would address an identified need for such properties. Policies may also make use of the nationally described space standard[2], where the need for an internal space standard can be justified.

2.4 The National Planning Practice Guidance (NPPG)[5] sets out guidance on Housing Optional Technical Standards[4] (March 2015). In paragraph 2, it states that local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations and an optional nationally described space standard. Local Authorities should gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local Plans.

2.5 The National Planning Practice Guidance (NPPG) also sets out guidance on Housing for Older and Disabled People[6] (June 2019). Paragraph 8 states that it is better to build accessible housing from the outset rather than have to make adaptations at a later stage – both in terms of cost and with regard to people being able to remain safe and independent in their homes. Paragraph 9 states that where an identified need exists, plans are expected to make use of the optional technical housing standards to help bring forward an adequate supply of accessible housing. In doing so planning policies for housing can set out the proportion of new housing that will be delivered to the optional technical standards.

[3] Department for Levelling up, Housing and Communities (2023). National Planning Policy Framework December 2023.
[4] Housing: optional technical standards - GOV.UK
[5] Planning practice guidance - GOV.UK
[6] Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities. Housing for older and disabled people. Housing for older and disabled people - GOV.UK

2.6 The technical housing standards guidance for Nationally Described Space Standards issued in March 2015 can be found in Appendix 2 of this Topic Paper.

Local policy

2.7 The Council's existing adopted policy on space standards (Internal Space and Accessibility Standards for Affordable Dwellings – PSP37) in the adopted Policies, Sites and Places Plan (adopted Nov 2017) requires Affordable Housing to be consistent with Nationally Described Space Standards, meet accessibility standard M4(2) and provide 8% of units to meet wheelchair standard M4(3) (only applicable to dwellings where the Local Authority is responsible for allocating or nominating a person to live in that dwelling).

2.8 The South Gloucestershire Council Plan[7] sets out a strategic goal to reduce inequalities. This sets out ambitions for:

- Improving housing and creating better living environments by supporting individuals in maintaining and adapting their homes to meet both current and future needs.
- Providing a diverse range of housing types and tenures as outlined in the Local Housing Needs Assessment, to address the evolving needs of the population. As the community grows, ages, and becomes more diverse, the council acknowledges the challenges posed by insufficient housing and transport infrastructure, which hinder the ability to ensure everyone can lead a healthy, fulfilling life. Ultimately, the goal is for more older people to feel they are ageing well.

2.9 The South Gloucestershire Tackling Inequalities Plan 2024-28[8] addresses the need for affordable and well-designed housing to promote health and well-being. It emphasizes creating homes that are adaptable to meet the needs of diverse populations, including ageing residents, while maintaining accessibility and sustainability.

[7] Council Plan 2024-2028
[8] Tackling Inequalities Plan 2024-2028

3. Minimum Space Standards

3.1 The Nationally Described Space Standards (NDSS), refer to guidelines set by the UK Government published by the Department of Communities and Local Government on 27 March 2015 to ensure that new homes provide adequate living space for residents. Space standards prescribe minimum internal spaces within new dwellings and is suitable for application across all tenures. It sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, built-in storage and floor to ceiling height.

3.2 Whilst the needs of residents will vary significantly, the NDSS represents a benchmark for all new dwellings across the country and across tenures, which balances being achievable and ensuring adequate space. The NPPG makes clear it is the only standard that LPAs should use.

3.3 In order to provide evidence for their inclusion in policy, the section below considers the implications of applying the NDSS against the three criteria set out in the NPPG – Need, Viability and Timing.

The need for Nationally Described Space Standards

3.4 Space is an important factor when people are choosing a home and has a significant ongoing impact on their quality of life. A lack of space can compromise the basic lifestyle needs that many people take for granted, such as having enough space to store possessions, play, exercise or entertain friends. But it can also have more profound knock-on effects on health, educational attainment, family relationships and social cohesion[9].

3.5 Dwelling size not only determines usability but also has a significant long-term impact on the diversity, flexibility, and adaptability of housing, and small dwellings in particular can have a negative effect on the health and well-being of occupants[10].

3.6 The size of new build properties has been the subject of much research and commentary in recent years. Notably, the Royal Institute of British Architects (RIBA) issued a paper in September 2011, "The Case for Space"[11] which outlined a range of issues. 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 76m^2 while in Ireland it is 87.7m (15% bigger), in the Netherlands with similar land pressures it is 115m^2 (53% bigger) while in Denmark is was 137m^2 (80% bigger).

3.7 In their 2015 report, "Space standards for homes", RIBA[9] reported that whilst there has been a small improvement in the size of new homes since their 2011 report, more than half of the new homes being built today are still not big enough to meet the needs of the people who buy them. The report found that outside London, the average new three-

[9] https://riba-prd-assets.azureedge.net/-/media/GatherContent/Space-Standards-for-Homes/Additional-Documents/HomewiseReport2015pdf.pdf?rev=9dde80a23ccc4c9c8cdf0fede85ee403

[10] Full article: Space standards in affordable housing in England

[11] #Homewise - Space Standards for Homes

bedroom home is 4m^2 smaller than the new standard. This data is similar across the Southwest, where the average is 4.3m^2 smaller. This measure is explored as part of the data analysis in the next chapter.

3.8 RIBA stressed that the current standard is far too complicated and onerous for Local Authorities to implement, and advocate that it would be simpler and fairer to embed the national minimum space standard within Building Regulations.

3.9 A policy briefing from Shelter[12], asserted that building larger homes would result in more homes being built by increasing public support. It presented evidence that the size of new homes is a major factor in local concerns about design. Nearly half (44%) of the public said they were more likely to support new housing developments if the homes were larger, even if it meant they take up more land. Only 23% said the same about developments with smaller homes on smaller sites.

Health and wellbeing

3.10 The evidence outlined in this section supports the need for a policy supported by the Nationally Described Space Standards (NDSS). It highlights the important relationship between the space in a home and health, well-being, and lifestyle needs, which the covid-19 pandemic has drawn a greater attention to within the literature.

3.11 There are various ways in which the amount of space in a house may impact on health. Whilst the relationship is complex, several studies provide strong evidence of an association. Evidence suggests associations between overcrowded and inadequate space and poor health and development rates, infectious diseases, particularly respiratory illness, mental health, stress, and educational attainment.

3.12 A research briefing was produced by the National Housing Federation, titled 'Housing issues during lockdown: health, space and overcrowding'[13]. Its findings were that:

- Nearly a third (31%) of adults in Britain – 15.9 million people – have had mental or physical health problems because of the condition of, or lack of space in, their home during lockdown.

- More than half of people (52%) who said their home was not big enough said they'd suffered from health problems during lockdown.

3.13 The Covid-19 pandemic has drawn greater attention to the link between housing, health, and equity. During the pandemic, people's housing environments affected their ability to shield themselves and others from COVID-19. Overcrowding, which had been increasing in the years prior to the pandemic, made it harder to self-isolate and shield, and may have contributed to higher death rates in poorer areas[14].

[12] Briefing: Little boxes, fewer homes - Shelter England
[13] housing-issues-during-lockdown---health-space-and-overcrowding.pdf
[14] 20MN_Main.qxd

3.14 Other reports show that In England, 850,000 households live in overcrowded conditions[15] and more than two million children in England live in overcrowded accommodation with little or no personal space, and over 300,000 share beds with family members. Households from minority ethnic backgrounds are three times as likely to be affected by overcrowding than white households. Over two thirds (70%) of overcrowded families say they have experienced both poor mental and poor physical health as a direct result of overcrowding[16].

3.15 The World Health Organisation Housing and Health Guidelines, defines crowding as a condition where the number of occupants exceeds the capacity of the dwelling space available, whether measured as rooms, bedrooms or floor area, resulting in adverse physical and mental health outcomes. It identified three main areas of impact: infectious disease, mental health and stress, and educational attainment[17].

3.16 The Health Foundation[18] has set out the links between housing and health, that have been exemplified through learning since the pandemic. It highlights the association between psychological distress and overcrowding, which is generally higher for overcrowded households.

3.17 Brookfield et al[19] identified aspects of the home environment that can either promote or hinder a more active, less sedentary lifestyle in older adults. Their research highlighted design recommendations, including supportive step features (e.g. straight stairs), spacious rooms, and reviewing the placement and type of facilities, fixtures, and fittings, all of which can help support older individuals in leading more active lives at home.

3.18 NICE Guideline 149[20] provides guidance for Indoor Air Quality in the Home. It outlines the housing conditions that put people at risk of poor air quality. It lists the physical infrastructure of a house as one of the factors, including the size of rooms. It highlights that overcrowding increases moisture in the air from everyday activities such as cooking and washing, and that smaller dwellings have less space in which to dilute pollutants.

Housing inequalities and vulnerable groups

3.19 A report by the Intergenerational Foundation[21] investigated housing inequalities over the last decade and during the COVID-19 pandemic. One of the key findings from the report shows that; space inequality has increased, with owner-occupied homes enjoying a third more space (108m^2) on average than privately rented homes (76m^2) and almost double the space of a social home.

3.20 Housing problems, including substandard living conditions, overcrowding, and unaffordable costs, can have an impact on health. The Health Foundation reported that

[15] Housing-Outlook-Q2-2024.pdf
[16] National Housing Federation - Overcrowding in England
[17] WHO Housing and health guidelines
[18] Better housing is crucial for our health and the COVID-19 recovery - The Health Foundation
[19] Full article: The home as enabler of more active lifestyles among older people
[20] Evidence | Indoor air quality at home | Guidance | NICE
[21] Stockpiling-Space_How-the-pandemic-has-increased-housing-inequalities_FINAL.pdf

households on the lowest incomes were far more likely to have at least one housing problem[22]. Furthermore, households headed by someone from a minority ethnic group or a younger adult, or households where someone is ill or disabled, were more likely to have at least one housing problem.

3.21 Evidence demonstrates that in the UK, people spend over 95% of their time indoors and 66% of this time in their homes[23]. Older adults in particular, spend a considerable amount of their time indoors[24].

Lifestyle needs

3.22 Residential internal space standards should provide adequate food preparation, cooking, dining and storage areas. Research suggests that some people have insufficient space to prepare meals conveniently, as 43% of respondents living in fully occupied homes say that they don't have enough space for convenient food preparation[25].

3.23 The impact of Covid-19 has seen an increased proportion of people working from home. ONS data[26] show that while the trend in working only from home has fallen since 2021, a hybrid-working model (part travelling to work, and part at home), has become the 'new normal' for around a quarter of workers in 2024. With limited space, there is less flexibility to redefine part of the home to meet household needs[27]. A paper by Alonso & Jacoby (2022) presented findings that demonstrate that having adequate space for daily activities is essential for healthy social-spatial relationships[28].

3.24 Bracht et al (2023)[29] studied the impact of learning space on students' motivation, stress and well-being. The paper summarised the evidence that demonstrated that the quality of physical space has been shown to have impacts on the perceived satisfaction, achievement and engagement of learners and in general is considered to be "crucial to learning". The papers findings can contribute to and inform the change process in the housing sector induced by the digital transformation through an increased need for suitable learning and workplaces in the home environment.

Space standards, overcrowding and under-occupancy

3.25 Occupancy rating provides a measure of whether a household's accommodation is overcrowded or under-occupied. An occupancy rating of negative 1 (-1) or less implies that a household has fewer bedrooms than the standard requirement, positive 1 (+1)

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[22] Inequalities in households experiencing housing problems - The Health Foundation
[23] HECC report 2023. Chapter 5: Impact of climate change policies on indoor environmental quality and health in UK housing
[24] What happens behind doors? Exploring everyday indoor activities when ageing in place
[25] Space in new homes: what residents think
[26] Who are the hybrid workers? - Office for National Statistics
[27] Urban rhythms in a small home: COVID-19 as a mechanism of exception - Jenny Preece, Kim McKee, David Robinson, John Flint, 2023
[28] Full article: The impact of housing design and quality on wellbeing: lived experiences of the home during COVID-19 in London
[29] Physical home-learning environments of traditional and non-traditional students during the COVID pandemic: exploring the impact of learning space on students' motivation, stress and well-being | Smart Learning Environments | Full Text

implies that they have more bedrooms than required, and 0 implies that they met the standard required[30].

3.26 Under-occupancy is widely expected in privately owned homes, and essential to the usability and acceptance of otherwise 'substandard' homes if compared to space standards[31]. Approximately 85% of private homes are not occupied to their maximum capacity. However, 55% of households on social rents fully occupy all their bedrooms[30].

3.27 2021 Census data shows that in South Gloucestershire, 2.9% of households have an occupancy rating of –1[30]. -1 or less implies that a household's accommodation has fewer rooms than required (overcrowded). Inequalities in overcrowding exist across South Gloucestershire, as this data rises to 21.6% of households in the output area E00075317 in Filton.

3.28 Morgan and Cruickshank (2014)[32] highlighted the link between under–occupancy and small homes, which the authors considered to be causal, as particularly important. The paper detailed that dwellings were frequently found to be under-occupied in comparison with the number of bedrooms. The research hypothesised that this was a result of the lack of space.

[30] Housing, England and Wales - Office for National Statistics
[31] Full article: Space standards in affordable housing in England
[32] Full article: Quantifying the extent of space shortages: English dwellings

4. Assessing the local evidence for NDSS

4.1 In order to establish whether the adoption of NDSS would be justified, as recommended by the PPG, the Council has sought to establish the size and type of dwellings that are currently being provided in South Gloucestershire.

4.2 The NDSS sets out a series of notes, technical requirements and within Appendix 2, a series of minimum required gross internal floor and storage areas, based on the number of bedrooms, bedspaces and storeys.

Methodology, data table and categories

4.3 The full data table can be viewed at Appendix 3.

4.4 An appropriate methodology for the assessment of schemes within South Gloucestershire was developed through a benchmarking assessment of other local authority NDSS topic papers, SPDs and evidence base studies, where a number of useful examples were identified.

4.5 All of the assessed schemes were either fully built out or under construction at the time of the assessment. This demonstrates that the house types have been fixed, and the permitted schemes developed. This does however mean that many of the assessed schemes are a few years older than the dates under which the applications were submitted, which accounts for the time for the planning process and the construction of the developments or start on site.

4.6 A total of 51 house type assessments were completed, across 23 individual planning applications, covering just over 1,600 homes and associated uses. Due to numerous standard house types being repeated within most of the major size applications, a total of 258 house types are covered under the assessment process.

4.7 To ensure an up-to-date cross-section of schemes, a range of time periods for planning applications were selected, dating from 2017 to 2022, with the majority of the applications (78.2%) submitted from 2019 onwards. More recent major schemes (of 10 or more dwellings) were generally chosen but due to the extended timescales for larger sites, including the submission of planning applications, the application process, site preparation and construction, the major applications tended to be slightly less recent compared with the minors.

4.8 The minor applications (between 1-9 dwellings) were all Full planning applications, apart from 2 which were Reserved Matters (RM). Of the major applications, all were RM types, having already gained Outline permission at an earlier date, generally including the principle of development, the specific Access arrangements, and up to a specified number of dwellings.

4.9 A wide range of applicants and developers were selected, including private individuals, small house builders and volume house builders. This approach enabled most of the largest volume house builders to be assessed and allowed multiple repeated house types to be included, which increased the numbers of total house types significantly.

The study included Bovis Homes, Taylor Wimpey, Crest Nicholson, Barratt, Redrow, and David Wilson.

4.10 A range of locations within South Gloucestershire were selected, including the more densely populated areas of the North and East Fringes of Bristol, the market towns of Yate and Thornbury, as well as rural villages and settlements. Of the 23 planning applications assessed, 3 (13%) were located in the North Fringe of Bristol, 7 (30.5%) within the East Fringe of Bristol, 2 (8.7%) within Yate, 2 (8.7%) within Thornbury, and 9 (39.1%) (all minor developments) within rural settlements. This generally reflects a pattern of development where most of the larger development sites are located within or directly adjacent to, the existing significant settlements, which provide more sustainable access to jobs, shops and public transport routes.

4.11 A spread of planning application sizes was chosen, with a comprehensive range of minor development application sizes. The majority of major development applications where construction had either commenced or completed at the time of the assessments, were between 100-150 units, which represents a typical standard site range for major developers. The outlier within the data was the much larger site at Harry Stoke, which provided a useful example of a much larger scale Reserved Matters application.

4.12 The majority of the assessed applications and house types were market tenure, since affordable tenure are already covered under the existing policy PSP37 of the South Gloucestershire Policies, Sites and Places Local Plan (2017)[33]. A small number of Affordable tenure types were included to check if the policy had been successful in ensuring the Affordable properties met the NDSS.

4.13 It is likely that the majority of housing provision across the plan period will be new build. Therefore, the vast majority (96.1%) of the 51 different house types assessed were new build, as opposed to conversions (3.9%).

4.14 The data table in appendix 3 indicates the plan number, which was used to measure the various criteria, available through the Council's Public Access system, under the relevant planning application number.

4.15 A range of houses and flats were assessed, including 1 and 2-bedroom flats, and 2 to 6-bedroom houses. This spread approach was followed in each of the minor and major development categories, with each of the major development applications including assessments of both houses and flats.

4.16 Each house type is assessed against NDSS requirements, using a pass (green) and fail (red) colour coding system (see Data Table – Appendix 3). It includes percentage above and below the required levels for overall Gross Internal Area (GIA) and built-in storage.

4.17 It is important to note that the final pass/fail result (column T within the data table), takes into account all of the relevant information from all of the assessed categories. It is not possible to pass the NDSS if one or more of the categories have not been passed

[33] Policies, Sites and Places plan (PSP) | BETA - South Gloucestershire Council

as each has a knock-on effect on the others, and therefore ultimately on living conditions. Point 7 on page 3 of the NDSS states that;

'*Minimum floor areas and room widths for bedrooms and minimum floor areas for storage are also an integral part of the space standard. They cannot be used in isolation from other parts of the design standard or removed from it.'*
For example, if a house type were to pass all the main space categories, but fail on built-in storage, this would still be counted as a fail overall. However, it is straightforward to identify which parts of each house type have passed or failed, and therefore which areas need to be improved.

4.18 Having calculated the required GIA and built-in storage required under Table 1 of the NDSS, the relevant floorplans for each house type were measured, including GIA, built-in storage, bedroom areas, and bedroom widths.

Data analysis

4.19 This section is based on the data collected during the assessment process and is presented in Appendix 3.

Pass / Fail

4.20 Out of the total number of 51 assessed house types, only 13 (25.5%) passed, with 38 (74.5%) failing to meet NDSS. Of the total of 258 house types (including the repeated standard house types mainly within the major development application schemes), only 75 (29%) passed, with 183 (71%) failing.

4.21 These figures indicate that based on the sample of assessed applications and house types, a large majority did not meet the NDSS. The following analysis provides a more detailed breakdown of the main factors.

Measured GIA

4.22 The analysis of GIA showed that of the 51 assessed house types, 31 (60.7%) passed this part of the NDSS, with 17 (33.3%) failing to meet the minimum levels required.

4.23 A clear difference between the approach to space standards between the minor and major development application house types was identified for GIA. Only 11 of the major developments (42.3%) passed, with 15 (57.7%) failing to meet the standard. Whereas, of the 25 house types in the minor development category, only 3 (12%) failed to meet the GIA requirement, with the majority of 22 (88%) meeting the GIA level. The minor development applications, tended to be developed by either individual house owners or small developers with a more bespoke style, while the major development applications tended to include standard house types produced by volume housebuilders.

4.24 In terms of analysing the percentage ranges shown in column F of the data table, one of the patterns is that for the minor application house types, of those which passed, 17 out of the 25 house types were more than 10% above the minimum level required. This can be contrasted with the major application house types, where only 4 out of the 26 house types were more than 10% above the minimum level. Also, for majors, of those

which failed to meet the required level, most (9 out of 16) were more than 10% below the required level.

4.25 The previous chapter highlighted a 2015 report by RIBA titled "Space standards for homes"[11], which found that outside London, the average new three-bedroom home is 4m^2 smaller than the new (NDSS) standard, with data from the across the Southwest being an average of 4.3m^2 smaller.

4.26 The data shows that for 3-bed houses, across all tenures, application scales, and including the repeated house types, that there were 79no. 3-bed house types assessed (see Table 1 below). The average required minimum GIA for these was 93.6m.sq., while the average actual measured GIA was 90m.sq., which is 3.6m.sq. below the required level.

4.27 If the 3-bed house types are split by application size, the minor house types had a required average area of 93.2m.sq. and had a measured area of 106.8m.sq., which is +13.6m.sq. For the major house types, the required average area was 93.7m.sq., while the measured average area was 86m.sq., which is 7.7m.sq. below the required level. This clearly shows that while the overall average GIA for 3-bedroom properties was below the required minimum level, the major application house types which were assessed were significantly below.

4.28 The following table shows the complete figures for all dwelling sizes split into all house types, minor and major, using the same method described above. In terms of the GIA figures across all house types, this analysis shows that for the house types containing 1, 2 and 3 bedrooms, all show average results which are lower than the minimum required average GIA. For house types which contain 4 and 5+ bedrooms, the analysis shows that these are well above the minimum levels required.

No. of bedrooms	Total house types	All house types average min. GIA	All house types average measured GIA	Average min. GIA (minors)	Average measured GIA (minors)	Average min. GIA (majors)	Average measured GIA (majors)
1	38	48.6	46.9	50	42.8	48.3	47.5
2	77	65.8	65.1	76.8	101.2	64.5	60.9
3	79	93.6	90	93.2	106.8	93.8	86.1
4	53	122.1	135.9	121	275.7	122.2	127.5
5+	11	134.7	185.7	134.7	185.7	-	-
	258						

Table 1 above: Shows the analysis of GIA figures, split into all house types, minors, and majors.

4.29 If the figures are split by application size, the minor types were generally above the minimum average GIAs in every category, except for the 1-bedroom dwellings, where they were nearly 7m.sq. below the minimum level. For the major types, all were below the minimum level except the 4-beds. For the 3-bed types, there was a significant shortfall, of 7.7m.sq.

4.30 The type of dwelling, and whether it is a flat or a house, was also analysed. Of the total number of 51 different house types assessed, 16 (31.4%) were 1 and 2-bedroom flats. While most of the minor scale applications consisted of only houses, when selecting house types to assess from the major applications, at least 1 flat type was included per scheme.

4.31 In terms of an analysis of the different sizes of dwellings (split into number of bedrooms), the following averages have been calculated, based on the 51 house types assessed. 1-bed dwellings (all flats) achieved an average of –7.2% below the minimum GIA level. 2-bed dwellings (flats and houses) achieved an average of +11.2% above the minimum level. 3-bed dwellings (all houses), achieved +2.1% above minimum, 4-bed dwellings achieved +40.7% above, while 5+ bedroom houses achieved +60% above. Of the 16 flats included in the study, 8 (50%) of these failed to meet the minimum GIA standard.

4.32 This shows that the smaller house types in each category (flats and houses) were clearly on average closer to the minimum levels than the house types with a higher number of bedrooms. In particular, the 1-bed flats were significantly below the minimum levels, with the worst example being –36% below. The very popular 3-bed house types which provide provision for families were only just above the minimum level, with 5 of the major house types being more than 10% below the minimum level.

4.33 This analysis contrasts with the general analysis of GIA when considering all 258 house types, for example the 3-bed house types including all the repeated ones, explained in paragraph 5.28 above. If all house types are included in the calculations, as opposed to a more simple average figure for each of the 51 house types (as shown in column F of the data sheet), a more accurate figure is produced. For example, the data sheet shows that there are a total of 7 applications which include an assessment of 1-bed house types, but if the repeated house types are counted, there is a total of 38no. 1-bed house types. This is an important distinction and results in different final figures. Given the approach set out in table 1 above is both more representative and more detailed, results obtained from this approach should be used as the final figures.

Built-in storage

4.34 This is one of the key measures within NDSS and perhaps the most significant in terms of the daily functioning of the home. The implications of not providing appropriate storage solutions are that more of the usable space is taken up with other types of freestanding storage, such as wardrobes and cupboards, which further impacts on usable floorspace and the perception of space.

4.35 Across all assessed house types, a total of 29 (57%) of the 51 failed to provide sufficient built-in storage, with 22 (43%) meeting or surpassing the minimum level.

4.36 In terms of the 25 minor size application house types assessed, 13 (52%) passed, while 12 (48%) failed. The average percentage was 39.8% over the minimum levels required.

4.37 For the 26 majors, 9 (34.6%) passed, while 17 (65.4%) failed. The average percentage was 0.8% over the minimum levels required, however numerous house types (9 out of 16, or 56%) which failed, provided built-in storage which was more than 20% below the minimum levels.

4.38 The overall results under this category show that meeting the built-in storage requirements under the NDSS was a significant issue, with 60% of the total number of assessed house types failing to meet the minimum standard, rising to nearly two-thirds (65.4%) in major applications.

4.39 It is worth noting that that there were a number of examples where there was overall GIA spare where built-in storage could have been provided, but either free-standing furniture was shown on the floorplans, or no furniture at all. This was particularly the case for a number of the larger GIA minor house types, which means that the pass rate for those house types could have been higher. This issue was much less prevalent when considering the major application house types, which tended to be much smaller in terms of GIA and therefore had much less opportunity to allocate space for built-in storage, without compromising bedroom widths requirements.

4.40 In terms of an analysis of differing sizes of dwellings (number of bedrooms), the following averages have been calculated. For 1-bed flats, the average was –25.7% below the minimum. 2-bed flats and houses were on average +26.2% above the minimum, but this figure was significantly skewed by the presence of a single house type which registered as being 440% above the minimum. If this single example was removed, the average of the other house types was –8.3%. For 3-bed houses, the average was –36.3%, 4-beds was +60.7%, and for 5+ bedroom houses, the average was +166%. This analysis shows that all of the smaller house types (including the adjusted 2-bed dwellings figure) were recorded as being significantly lower than the minimum levels, with only the largest house types passing this part of the NDSS. However, the inclusion of the 2-bed house type with the 440% provision demonstrates that there are examples where a positive provision of built-in storage has been achieved.

4.41 After reviewing the first two main categories (GIA and built-in storage) of the 51 house types assessed, only 19 (37%) had the required overall space and built-in storage, with 32 house types (63%) failing to meet the minimum levels.

Single bedrooms

4.42 Part c. of the technical requirements within the NDSS requires single bedrooms (where present) to achieve a floor area of at least 7.5m.sq. and be at least 2.15m wide.

4.43 Of the 51 assessed house types, 26 (50.9%) included at least 1 single bedroom. Of these, 12 (46%) achieved the minimum level of floorspace, while 14 (54%) failed to meet the minimum level. The average amount of floorspace across all single bedrooms was 7.7m.sq., which is marginally above the minimum level. The smallest floor area was 5m.sq., while the largest as 10.1m.sq.

4.44 In terms of the split between minor and major applications single bedroom sizes, the minors averaged 8.75m.sq., while the majors averaged 7.1m.sq., the latter being marginally below the minimum level.

4.45 For single bedroom widths, of the 26 assessed house types, 17 (65%) achieved or surpassed the minimum required level, while 9 (35%) failed to meet the minimum level. For minors, the average size was 2.9m, while for majors, the average size was 2.2m.

Double/twin bedrooms

4.46 This category is covered under parts b, d, and e of the technical requirements of the NDSS. The minimum bedroom floor area for a house type with 2 bedspaces is 11.5m.sq., with 1 double/twin room being 2.75m wide and every other double/twin bedroom being at least 2.55m wide.

4.47 Only 3 of the 51 assessed house types did not include at least 1 double or twin bedroom, with the strong trend for the vast majority of house types to include a double/twin bedroom. Of the 15 flats assessed, 12 (80%) only included a double/twin bedroom, with only a single house type only including a single bedroom. This suggests that the flat house types tend to favour a larger bedroom size.

4.48 In terms of the smallest double/twin bedroom size, of the 48 house types which included 1 or more double/twin bedrooms, 27 (56%) met or surpassed the minimum area level required, while 21 (44%) failed to meet the minimum level. The average size across all house types was 11.2m.sq., which is marginally below the minimum level.

4.49 In terms of the bedrooms within the 23 minor application house types assessed, only 4 did not pass, with the average across all of the minors being 12.5m.sq. For the 25 major application house types, 17 (68%) did not meet the minimum level, while only 8 (32%) met or surpassed the minimum. The average across the majors was 10.1m.sq., which is 1.4m.sq. below the minimum level. This area is equivalent to approximately 0.5m extra depth to a bedroom which is 3m wide, which would be sufficient space to accommodate a built-in wardrobe.

4.50 For the widths of the double/twin rooms, the clear trend across all house types was that these bedrooms were generally acceptable in terms of meeting the NDSS minimum widths. Only 3 (2.6%) individual bedrooms out of a total of 114 assessed did not meet the minimum required widths. The average across all bedrooms assessed was 3.3m, which is above both the 2.75m and 2.55m required figures.

4.51 This analysis shows that there was a clear issue with double/twin bedroom areas, particularly relating to the major applications, where more than two-thirds of bedrooms fell below the minimum standard. However, bedroom widths were generally acceptable. One important point to note relating to the widths calculation is that if a built-in wardrobe was present, the room width was required to be taken from the front of that feature, meaning that the width of the bedroom would be reduced, whereas the overall area would include the built-in wardrobe and therefore not be affected. If a free-standing wardrobe was indicated on the floorplan, the room width would be measured from the wall. If more built-in storage were provided, this would therefore likely have

reduced the widths of the bedrooms and could have meant a greater proportion would not have met the minimum width requirements.

Floor to ceiling height

4.52 Part i of the technical standards requires a minimum floor to ceiling height of 2.3m for at least 75% of the Gross Internal Area. Data on this was not collected during the assessment of the house types but the vast majority of the house types were standard dwellings which exceeded this minimum level. Where storage areas within roof spaces were counted, heights and areas of spaces were measured or estimated based on the available information, such as elevations and cross-sections plans.

Affordable tenures

4.53 While the vast majority of the assessed house types were market tenure, 3 of the house types were Affordable tenure, all within the major scale applications, covering a total of 19 of the total of 258 house types (including the repeated types). While this represents a small sample size, it is useful to highlight a few key points. All three of the house types either met or surpassed the minimum GIA level. However, built-in storage was again an issue, with only 1 of the 3 house types meeting the minimum level, with the other two being –5% below and –28% below. One of the house types also failed to meet the minimum single bedroom size, and one failed to meet the minimum double/twin bedroom size.

4.54 This indicates that even though Affordable tenures of housing are already covered by the NDSS under the existing policy, all of those assessed failed to meet the NDSS in a variety of ways.

Summary of findings

4.55 The analysis of GIA showed that of the 51 assessed house types, 31 (60.7%) passed the Gross Internal Area part of the NDSS, with 17 (33.3%) failing to meet the minimum levels required. However, focussing on the major application house types, nearly 60% of these failed, indicting that there is a significant issue affecting the house types within the volume housebuilder schemes.

4.56 In terms of the GIA for flats and the smaller house types, the analysis showed that the smallest flats, and the 3-bedroom houses, achieved a much lower space provision against the required levels when compared to the house types where a greater number of bedrooms were provided. When considering all house types, including the repeated ones, the summary table shows that the average floor areas for the 1, 2, and 3-bed house types all fell below the minimum levels.

4.57 The analysis of the built-in storage category showed that meeting the NDSS was a significant issue, with 60% of the total number of assessed house types failing to meet the minimum standard, rising to nearly two-thirds (65.4%) in major applications. The average figures for each different category (number of bedrooms), shows that the smaller house types, including 1 and 2-bed flats, and 2 and 3-bed houses, under-provided built-in storage.

4.58 In terms of bedroom sizes, again, there were consistent issues identified, particularly around the sizes of the smallest bedrooms (both single and double/twin), but widths of bedrooms were generally found to be acceptable, particularly when analysing the widths of the double/twin bedrooms. However, this finding should be considered in the context of the lack of provision of built-in storage. It is very likely that if the required levels of storage were provided, this would impact on measured bedroom widths and therefore on the number of assessed house types which passed this part of the NDSS.

4.59 All of the issues identified in the main sections of the analysis contributed to the very high overall failure rate, with nearly three-quarters (74.5%) of all of the measured house types failing to meet one or more of the technical requirements within the NDSS. Within each category, 33.3% failed to meet the GIA requirement, 57% failed to meet the built-in space requirement, and 45% failed to provide adequate bedroom sizes.

5. Accessible standards

5.1 National policy and guidance enables local planning authorities to identify the proportion of dwellings in new developments that should comply with the accessibility requirements within the Building Regulations 2010 - Access to and use of buildings within Approved Document Part M4(2) and M4(3) as part of the Local Plan, based on the likely future need and taking account of the overall impact on viability.

5.2 The People at the Heart of Care - Adult Social Care Reform White Paper[34] is underpinned by the principle of sustaining people at home for as long as possible. The paper recognises that:

- Most people will continue to live in mainstream housing, and we need to ensure they can adapt their homes to meet their needs where necessary
- Around 1.9 million households in England are home to someone with a health condition that requires an adaptation to their home to support everyday tasks like washing and using the bathroom, cooking, or getting out and about easily
- In 2019–20, 53% of households requiring an adaption did not have all the adaptations needed, a rise from 45% in 2014–15.

5.3 The 'Raising Accessibility Standards for New Homes' consultation paper (MHCLG, 2020) considered how to raise accessibility standards, recognising the importance of suitable homes for older and disabled people. The consultation proposals recommended that all homes are built to M4(2) standard. Furthermore, the proposal recognised that:

- Raising the accessibility standards of new homes will have a positive impact on household health and welfare and are particularly relevant to the following protected groups: Age and Disability.
- If older and disabled people can live in suitable homes for longer, there will be a reduction in reliance on the NHS and social services.
- If older and disabled people can live more independently in their own homes, they have greater choice and control over their lives, and will be able to work, socialise and contribute to society as fully as possible.

The Part M Building Regulations

5.4 The Building Regulations 2010 Approved Document Part M: Access to and use of buildings (2015 edition incorporating 2016 amendments – for use in England)[35]. Introduces 3 categories of dwellings.

5.5 M4(1) Category 1: The existing minimum standard for accessible housing in England has four main requirements that make homes accessible and visitable for most people, including wheelchair users: level access to the main entrance; a flush threshold; sufficiently wide doorways and circulation space; and a toilet at entrance level. This applies as the minimum for all new build homes; but not to extensions or changes of use.

[34] People at the Heart of Care: adult social care reform

[35] Access to and use of buildings: Approved Document M - GOV.UK

5.6 M4(2) Category 2: Accessible and adaptable dwellings. Requires additional features including having a living area at entrance level and step-free access to all entrance level rooms and facilities, wider doorways and corridors as well as clear access routes to reach windows. It also includes further features to make homes more easily adaptable over time for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users, for example sanitary provisions that can be adapted easily for installation of grab rails and stairs designed to allow easy fit of a stair lift.

5.7 M4(3) Category 3: Wheelchair user dwellings. Achieved when a new dwelling provides reasonable provisions for a wheelchair user to live in the dwelling and have the ability to use any private outdoor space, parking and communal facilities.

5.8 Categories M4(2) and M4(3) are optional requirements which local authorities can apply through local planning policies where they have identified a local need and where the viability of development is not compromised.

The Need for adoption of accessible standards (M4(2) and M4(3))

5.9 The South Gloucestershire Local Housing Needs Assessment – Report of Findings 2023[36], sets out the evidence base for housing accessibility requirements within South Gloucestershire. It provides clear evidence of a need to support the M4(3) percentages for market, affordable and age restricted housing outlined in the Internal Space and Accessibility Standards Policy, providing that this does not compromise viability. Furthermore, it sets out that the then Government proposed to mandate the current M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations as a minimum standard for all new homes[37].

5.10 The South Gloucestershire Housing Strategy[38] highlights the impact that housing has on health and wellbeing. It recognises that the accessibility standards of new homes will have a positive impact on household health and welfare, and are particularly relevant to the protected groups, age and disability.

5.11 While features of accessible and adaptable homes support people with physical disabilities and for people living with a reduction in their mobility, the accessible and adaptable features also support a range of other disabilities. For example, the presence of toilets on the ground floor will support people with invisible disabilities such as incontinence and other mental health or sensory issues. It also can be supportive and practical for all people that live in the property, including families with young children. It can be beneficial during toilet training a child, due to its proximity and ease of access. If older and disabled people can live in suitable homes for longer, there will be a reduction in reliance on the NHS and social services.

[36] South Gloucestershire Local Housing Needs Assessment Report of Findings December 2023
[37] Raising accessibility standards for new homes: summary of consultation responses and government response - GOV.UK
[38] Housing strategy | BETA - South Gloucestershire Council

5.12 In establishing the need for M4(2) Category 2 housing it is also important to consider the population projections and health demographics of the area.

Housing needs for older and disabled people

5.13 The Good Home Enquiry[39], commissioned by the Centre for Ageing Better, highlighted the urgent need for action to address the poor quality of homes in England. The report emphasized that the UK's population is ageing, with one in four people projected to be over 65 by 2050. It also pointed out that the UK has the oldest housing stock in Europe, which is poorly equipped to accommodate the necessary adaptations for an ageing population. Importantly it states that it is known that the vast majority of people would prefer to remain living independently in their own homes and communities as they age.

5.14 Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems[40].

National data

5.15 Lord Darzi's report[41] on the state of the National Health Service in England, highlighted that:

"An ageing population is the most significant driver of increased healthcare needs since it is associated with the development of long-term conditions such as diabetes, breathing difficulties, or depression".

5.16 The report also highlighted the following issues;

- By the time people are aged 65-74, a majority will have at least one long-term condition and some 40 per cent will have two or more.
- By the time people are aged 75-84, this rises to nearly 60 per cent having two or more, and by the time people are aged 85 or above, 9 out of 10 will have at least one long-term condition.

5.17 Data from the Office of National Statistics (ONS)[30], outlines that by 2041, one in four (25%) people in England will be aged 65 or over. The fastest increase will be in the 85 years and over age group, with the number of people aged 85 and over expected to double to 3.2 million by 2041.

South Gloucestershire

5.18 In South Gloucestershire, approximately 2 in 5 (40%) people are over 50. The population of South Gloucestershire is expected to continue to grow over the next 20 years, with the over-75 population increasing to 11.4% of the total by 2041[42].

5.19 The Joint Strategic Needs Assessment (JSNA) details that in South Gloucestershire, an ageing population will see the numbers of disabled people continuing to increase.

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[39] The Good Home Inquiry | Centre for Ageing Better
[40] Housing for older and disabled people - GOV.UK
[41] Independent investigation of the NHS in England - GOV.UK
[42] Adult Social Care & Ageing Well

5.20 In 2021 in South Gloucestershire, just over a quarter (25.5%) of the population aged 50 and over were classed as disabled under the Equality Act. The proportion of people living with a disability is higher among older adults[42].

5.21 There is expected to be an increase of 9,300 additional households by 2040 where illness or disability affects their housing need[36].

6. Case studies

6.1 The approaches and policies from the neighbouring authorities of Bristol, Gloucester, Wiltshire, and North Somerset, have been assessed, with the following key points;

Gloucester

6.2 Included policies on[43] all new development meeting or exceeding space standards and 25% to M4(2) and 4% to M4(3) (Policy A6) in their adopted local plan (adopted January 2023).

Bristol City Council

6.3 Local Plan Publication Version[44] (November, 2023), included policies on complying with nationally described space standards for residential development intended for permanent or long-term occupation (Policy DC1), all new build to M4(2) and 10% to M4(3) (Policy H9-Accesibile homes).

North Somerset

6.4 Local Plan Pre-submission – Reg-19 (July 2024) included a policies on all new dwellings meeting space standards (Policy DP45), all new dwellings to meet M4(2) and 5% to meet M4(3) (Policy DP46)[45].

Wiltshire Council

6.5 Local Plan Pre-submission – Reg-19 (2023) included a policy for all market and affordable housing to meet NDSS and M4(2) and 7% of all housing to meet M4(3) (Policy 78)[46].

6.6 South Gloucestershire Council is proposing a policy which provides the same level of provision compared to all of the local authorities listed above, with regards to space standards. The proposed policy for M4(2) is the same as 3 out of 4 of the above local authorities, and to a higher requirement compared to Gloucester. The proposed policy for M4(3) is similar compared to the above local authorities.

[43] gloucester-city-plan-high-res.pdf
[44] Bristol Local Plan: Publication version November 2023
[45] North Somerset Local Plan 2040 Pre-submission Plan
[46] Local Plan Review Pre-Submission Review 2023

7. Viability

7.1 Viability testing is an important part of the plan-making process. The full Viability Assessment must be prepared as part of the wider evidence base to ensure that the plan-making stage requirements of the National Planning Policy Framework (NPPF) can be met and conducted in a way that is consistent with the approach set out in the Planning Practice Guidance (PPG).

7.2 The impacts of adopting an internal space and accessibility standards policy have been considered as part of a viability assessment for the emerging local plan. It assessed the impact of the introduction of adopting NDSS, alongside M4(2) and M4(3) accessibility standards on a range of residential development typologies and scenarios.

7.3 In 2023, Dixon Searle Partnership were appointed by South Gloucestershire Council to produce the Viability Position Statement[47], which factored in the costs of meeting NDSS, M4(2) and M4(3) standards, based on the assumption that all new homes would be built to NDSS and M4(2) standard, with a specific requirement to M4(3). The study concluded that this policy requirement, alongside others such as the Affordable Housing Policy would not render development unviable.

7.4 Dixon Searle Partnership has produced the Local Plan Viability Assessment & Community Infrastructure Levy (CIL) Scoping Report – Final report (Dec 2024)[48], on behalf of South Gloucestershire Council. This report supports the various policies contained in the new Local Plan and provides an assessment of the viability of those policies when considered together, alongside typical costs and national requirements, such as Building Regulations.

7.5 While viability does partly depend on local conditions, and on the type of development proposed, the report notes that there has been found to be a healthy, relatively strong development viability picture in South Gloucestershire. The findings continue to suggest that, broadly, the cumulative policy set envisaged within the emerging new Local Plan should mean that sites retain the ability to come forward viably in general. The Council is therefore confident that the requirements set out in the Internal Space and Accessibility Standards Policy are viable in South Gloucestershire.

[47] Viability-Position-Statement.pdf

[48] Dixon Searle Partnership. For: South Gloucestershire Council Local Plan Viability Assessment & Community Infrastructure Levy (CIL) Scoping Report Final Report December 2024 DSP24859.

8. Timing

8.1 With regard to timing, the Nationally Described Space Standards were first introduced by the Government in 2015 and have since been adopted by numerous of Local Authorities.

8.2 The preferred policy approach for the inclusion of space, accessible and adaptable standards was set out in the Issues and Approaches Local Plan Phase 1 consultation (2020)[49] and the subsequent Phase 2 Urban, Rural and Key Issues[50] public consultation, thereby setting a clear direction of travel for the council. Applicants and developers should therefore be aware of the standards and the Council's intention to apply them to new developments by implementing the new Internal Space and Accessibility Standards Policy.

8.3 The South Gloucestershire Local Plan is not anticipated to be adopted until 2026. As such, by the time any policy is adopted, developers should be aware of the space, accessible and adaptable standards, and of the Council's intention to apply them. Therefore, the policy does not include any reference to transitional arrangements, and the new policy will take effect upon the Adoption of the new Local Plan.

[49] Issues and priorities | BETA - South Gloucestershire Council
[50] Local Plan 2020 – Phase 2 Urban, Rural and Key Issues | BETA - South Gloucestershire Council

9. Conclusions

9.1 The application of space and accessibility standards ensures new developments are appropriately sized to meet the needs of residents and can adapt and evolve over time, including greater accessibility as people age, helping them remain in their homes longer. This policy is essential in supporting the objectives of both the Council Plan and the Local Plan.

9.2 Having established the relationships between housing and health at the national level, more specific supporting evidence was presented on space standards and accessibility, which established that when considered against need, viability and timing, that all three criteria have been met.

9.3 Evidence for the 'need' criteria is set out for both the space standards and accessibility requirements of the policy. For space standards, local evidence was collected and analysed to meet the technical requirements set out in the Nationally Described Space Standards (NDSS), which were divided up into Gross Internal Area (GIA), built-in storage, and bedroom sizes. The analysis showed that nearly three-quarters (74.5%) of the total number of house types assessed failed to meet the NDSS, for a variety of reasons.

9.4 In terms of wider accessibility need, this has been established through an assessment of Government guidance and Building Regulations, while local need is supported by the Local Housing Needs Assessment (LHNA). This assessment provides clear evidence of a need to support the enhanced M4(2) and M4(3) accessibility standards set out in the Building Regulations Approved Document M.

Policy implications

9.5 There are various implications resulting from the analysis. The most significant being that there is a clear under-provision of space within new developments, when analysed against the NDSS. This analysis supports the need to apply the enhanced space standards to all residential properties, as set out in the Internal Space and Accessibility Standards policy.

9.6 The pattern of the smaller types of dwellings being generally found to be below the minimum required levels set out in the NDSS also has specific implications for the new Effective Use of Land policy, and the overall approach of making effective use of land within optimised-density schemes. As densities increase, it is very likely that the proportion of flats of all sizes will also increase, as will the smaller houses, while the houses with a greater number of bedrooms will decrease. Additionally, given flats in particular are aways provided with lower levels of private amenity space when compared with houses, it is vital that appropriate and NDSS-compliant internal living spaces and built-in storage are provided.

9.7 Working patterns are also changing, with greater numbers of people now working from home, at least part of the time and this needs to be considered. This trend will mean that the amount of time spent indoors at home will increase which could exacerbate

issues resulting from an under provision of overall space, including health & wellbeing impacts.

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Appendix 1: Draft Space and Accessibility Standards policy

Policy wording

1. **All new housing (Market and Affordable) will be required to meet the M4(2) accessible and adaptable dwellings standard and meet or exceed the Nationally Described Space Standards (NDSS), or any future replacement standards. Evidence should be provided with each application setting out areas for bedrooms, built-in storage, floorspace and ceiling heights for each dwelling.**
2. **As a minimum, all market housing for major development (10 or more dwellings) should provide 4% of dwellings built to meet the M4(3) (2a) standard (wheelchair adaptable housing); and**
3. **As a minimum, Affordable Housing for major development should provide 10% of dwellings built to meet the M4(3) (2a) standard (wheelchair adaptable housing); and**
4. **For specialist accommodation for older people, all dwellings, irrespective of tenure, will be required to meet Building Regulation M4(3) (2a) standard (wheelchair adaptable housing).**

Appendix 2 – Technical housing standards guidance for Nationally Described Space Standards. March 2015. Department for Communities and Local Government.

Technical requirements

10. The standard requires that:

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

[1] The internal face of a perimeter wall is the finished surface of the wall. For a detached house, the perimeter walls are the external walls that enclose the dwelling, and for other houses or apartments they are the external walls and party walls.

Table 1 - Minimum gross internal floor areas and storage (m^2)

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

Appendix 3: NDSS Data table of assessed house types

															A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T
No.	**Site address**	**Application number**	**Applicant / Developer**	**Location**	**Ward**	**No. of dwellings**	**App. scale**	**Tenure (market / affordable)**	**New build / conversion**	**Plot number**	**No. of house types**	**House type plan ref.**	**House / flat**	**No. of bedrooms**	**No. of bed spaces**	**No. of storeys**	**Min. GIA (m2)**	**Measured GIA (m2)**	**% +/-**	**Min. built in storage (m2)**	**Measured built in storage (m2)**	**% +/-**	**No. of single bedrooms**	**Smallest single bed area (m2)**	**Smallest single bed width (m)**	**No. of double/twin bedrooms**	**Smallest doube/twin bedroom (m2)**	**Double/twin bedroom widths (m) 1**	**Double/twin bedroom widths (m) 2**	**Double/twin bedroom widths (m) 3**	**Double/twin bedroom widths (m) 4**	**Double/twin bedroom widths (m) 5**	**Pass / Fail**
1	Red Lion Public House 76 Broad Street Staple Hill BS16 5NL	P20/06288/F	Premium Abodes	East Fringe	Staple Hill and Mangotsfield	9	Minor	Market	New build	1st middle	1	1st & 2nd floor plan - 1872-CMS-00-XX-DR-A-PL12	Flat	1	2	1	50	50	0.0	1.5	1.8	20.0	0			1	13	2.9					Pass
2							Minor	Market	New build	1st floor NW	1	1st & 2nd floor plan - 1872-CMS-00-XX-DR-A-PL12	Flat	2	4	1	70	72	2.9	2	1.8	-10.0	0			2	13.5	2.9	2.7				Fail
3							Minor	Market	Conversion	1st floor NE	1	1st & 2nd floor plan - 1872-CMS-00-XX-DR-A-PL12	Flat	2	4	2	79	96.2	21.8	2	0	-100.0	0			2	13.9	2.8	3.4				Fail
4	Land On The Corner Of Soundwell Road And Ingleside Road	P20/11370/F	Whitehorse Homes Ltd.	East Fringe	Kingswood	7	Minor	Market	New build	1	2	Proposed Floor Plans - 3223/4 (Feb 2020)	Flat	1	2	1	50	50	0.0	1.5	0.68	-54.7	0			1	10.8	3.0					Fail
5	Fleur De Lys 12 Shortwood Road Pucklechurch BS16 9RA	P20/23558/F	UKS Group Ltd.	Rural settlements	Boyd Valley	6	Minor	Market	New build	1	3	Plots 1, 2 & 3 floor plans - 19.016 - 030a (11.11.19)	House	3	3	2	84	93.8	11.7	2.5	0	-100.0	3	10.1	2.5	0							Fail
6							Minor	Market	New build	4	3	Plots 4, 5 & 6 floor plans - 19.016 - 032a (11.11.19)	House	3	3	2	84	93.8	11.7	2.5	0	-100.0	3	10.1	2.5	0							Fail
7	Land At Watermore Junior School, Frampton Cotterell BS36 2LE	P19/13690/RM	L P Housing Ltd.	Rural settlements	Frampton Cotterell	5	Minor	Market	New build	1	5	Proposed typical house floor plans - 1104 P4 (05.12.19)	House	5	8	3	134	153	14.2	3.5	9.6	174.3	2	12	2.7	3	13.2	2.9	3.1	3.9			Pass
8	Land Between Patch Elm House And The Groves Patch Elm Lane Rangeworthy BS37 7LT	P19/16119/F	Veya Homes	Rural settlements	Frampton Cotterell	4	Minor	Market	New build	1	4	Dwelling 1 plans - 1916 AL(0)16 P2 (11.11.19)	House	3	6	2	102	124	21.6	2.5	3	20.0	0			3	11.9	3.0	2.9	4			Pass
9	Crowthers Farm Goose Green Yate BS37 5BJ	P20/04569/F	Tan Homes Ltd.	Yate	Yate North	4	Minor	Market	New build	2	1	Proposed 5 bed plot 2 gr &1st floor plan - 1681(L)41 (13.02.20)	House	5	10	2	128	228	78.1	3.5	13.5	285.7	0			5	12.2	3.0	3.4	2.9	4	3	Pass
10							Minor	Market	Conversion	4	1	Proposed 5 bed farmhouse gr & 1st floor plan - 1681(L)60 (13.02.20)	House	4	7	2	115	232	101.7	3	4.2	40.0	0			4	10.7	2.8	2.9	4	3.5		Pass
11	Castle Quarry West Street Tytherington GL12 8UQ	P19/0668/F	Mr and Mrs Brock	Rural settlements	Frampton Cotterell	3	Minor	Market	New build	1	1	Dwelling one GF and FF plan - 1630 AP(0)13	House	4	8	2	124	227	83.1	3	9.4	213.3	0			4	11.9	3.5	3.5	3.5	4		Pass
12							Minor	Market	New build	2	1	Dwelling two GF and FF plan - 1630 AP(0)14	House	3	6	2	102	132	29.4	2.5	1.2	-52.0	0			3	12.1	2.9	3.1	2.9			Fail
13	2 Bath Road Bitton Bristol BS30 6HZ	P20/01184/F	Mr Edward Morgan	Rural settlements	Bitton & Oldland Common	3	Minor	Market	New build	1	2	Layout and roof plan - WIL1101 (Jan 2020)	Flat	1	2	1	50	32	-36.0	1.5	0.9	-40.0	0			1	10.6	2.9					Fail
14							Minor	Market	New build	3	1	Layout and roof plan - WIL1101 (Jan 2020)	Flat	2	4	1	70	67.5	-3.6	2	3.2	60.0	0			2	12	3.5	3.5				Fail
15	1 Hawthorn Crescent Thornbury Bristol BS35 1ED	P19/1136/F	Mr Sturart Hughes	Thornbury	Thornbury North	2	Minor	Market	New build	1	1	Proposed plans - plot 01 - A17 18 20 P11 Rev D (28.08.18)	House	3	6	2	102	127	24.5	2.5	1.4	-44.0	0			3	13.5	4.5	3.4	2.6			Fail
16							Minor	Market	New build	2	1	Proposed plans plot 2 - A17 18 20 P13 Rev E (28.08.18)	House	3	5	2	93	96	3.2	2.5	0.6	-76.0	1	7.3	2	2	13.2	3.2	2.7				Fail
17	87 Hill House Road Mangotsfield BS16 5QW	P21/00916/RM	Mr Mark Andrews	East Fringe	Staple Hill and Mangotsfield	4	Minor	Market	New build	1	2	Proposed plans & elevations plot 1 - 245/07 (Feb 2021)	House	6	10	3	138	163	18.1	4	7.2	80.0	2	6.3	3.9	4	10.4	3.5	3.4	3.2	2.9		Fail
18							Minor	Market	New build	4	2	Proposed plans & elevations plot 4 - 245/10 (Feb 2021)	House	6	10	3	138	201	45.7	4	5.6	40.0	2	7.1	4	4	10.4	3.5	3.4	3.2	2.9		Fail
19	32 Dragon Road Winterbourne BS36 1BG	P20/21230/F	Mr D Drew	Rural settlements	Winterbourne	4	Minor	Market	New build	1	2	Ground floor plans - 1560-02A, First floor plans - 1560-03A	House	2	4	2	79	101	27.8	2	2.8	40.0	0			2	14.6	4.2	2.6				Pass
20							Minor	Market	New build	2	2	Ground floor plans - 1560-02A, First floor plans - 1560-03A	House	2	4	2	79	96	21.5	2	1.4	-30.0	0			2	14.6	4.3	2.6				Fail
21	Land Adjacent To 58 Woodyleaze Drive Hanham BS15 3BY	P20/04420/F	Mr T McGarth	East Fringe	Hanham	1	Minor	Market	New build	1	1	Proposed floor plans and elevations - 3227/3 (Feb 2020)	House	3	5	2	96	96	0.0	2.5	2.3	-8.0	1	6.7	2.7	2	10	3.2	2.8				Fail
22	47 Bristol Road Frenchay BS16 1LQ	P20/09245/F	Mr and Mrs A Cleverly	East Fringe	Frenchay and Downend	1	Minor	Market	New build	1	1	Proposed floor plans (May 2020)	House	4	8	2	124	368	196.8	3	4.4	46.7	0			4	12.2	5.0	3.8	3.3	3.1		Pass
23	Old Orchard 22 Townsend Lane Almondsbury BS32 4EQ	P20/10658/F	Mr & Mrs Boorman	Rural settlements	Severn Vale	1	Minor	Market	New build	1	1	Proposed plans and elevations (07.05.2020)	House	6	10	2	132	322	143.9	4	14	250.0	2	9.5	3.1	4	15	4.6	4.0	3.6	3.2		Pass
24	22 Beach Avenue Severn Beach BS35 4PB	P21/00013/F	Ed Cemery	Rural settlements	Pilning and Severn Beach	1	Minor	Market	New build	1	1	Proposed first floor rev.A - 2011-04 (11.01.21)	House	2	4	2	79	180	127.8	2	10.8	440.0	0			2	17.8	3.3	2.9				Pass
25	Land At 12 Homefield Road Pucklechurch BS16 9QD	P22/01991/F	Mr Graham Hampson	Rural settlements	Boyd Valley	1	Minor	Market	New build	1	1	Floor plans HT01 - Rev.A	House	3	5	2	93	92	-1.1	2.5	0	-100.0	1	9.7	2.7	2	9.8	3.4	2.7				Fail
26	Parcels H1, H2a And H2b Charlton Hayes Patchway Bristol	PT18/0268/RM	Bovis Homes	North Fringe	Patchway	110	Major	Market	New build	135	8	House Type - D v1 Floor plans & elevations (01/18)	House	3	5	2	93	78	-16.1	2.5	2.1	-16.0	1	6	1.9	2	8	2.9	2.6				Fail
27								Market	New build	144	7	House Type - H v1 Floor plans & elevations (01/18)	House	3	5	2	93	78	-16.1	2.5	2.2	-12.0	1	6.3	1.9	2	8.6	2.8	2.7				Fail
28								Market	New build	77	6	House Type - K1a plots 77-82 ground / first floor plan (01/18)	Flat	2	3	1	61	58	-4.9	2	1.2	-40.0	1	7.7	2.15	1	9.3	2.6					Fail
29								Market	New build	165	6	House Type - K3 plots 165-170 ground / first floor plan (01/18)	Flat	1	2	1	50	46	-8.0	1.5	0	-100.0	0			1	10.9	3.0					Fail
30								Affordable	New build	108	5	House Type - W 3B5P mobility floor plans & elevations (01/18)	House	3	5	2	93	100	7.5	2.5	2.5	0.0	1	6.5	2.2	2	13.6	3.2	2.8				Fail
31								Affordable	New build	155	5	House Type - N Plots 154-158 - 16-2-1 (01/18)	Flat	1	2	1	39	38	-2.6	1.5	0.82	-45.3	1	8.4	2.7	0							Fail
32	East of Coldharbour Lane - [Phase 2] (based on PT15/1179/O all matters reserved)	PT18/0659/RM	Taylor Wimpey	North Fringe	Stoke Gifford	103	Major	Market	New build	305	10	Housetype Planning Drawing PA34-201 A (27.09.17)	House	3	5	2	93	80.2	-13.8	2.5	1.9	-24.0	1	7	2	2	8.7	2.8	2.7				Fail
33								Market	New build	326	8	Housetype Planning Drawing PE41S-201 A (27.09.17)	House	4	7	3	121	143.3	18.4	3	0.9	-70.0	1	7.5	2.15	3	9.7	3.5	3.1	2.9			Fail
34								Market	New build	311	6	Housetype Planning Drawing NB41G-202 A (27.09.17)	House	4	6	3	112	126	12.5	3	10.3	243.3	2	8	2.4	2	7.7	5.2	3.3				Fail
35	Parcel 19 Land South Of Howsmoor Lane Whitehouse Farm Emersons Green	P19/19012/RM	Taylor Wimpey	East Fringe	Emersons Green	76	Major	Market	New build	624	8	NB31 (Braxton) Elevations southern character area 16012.NB31.302	House	3	5	3	99	102	3.0	2.5	2.9	16.0	1	7.5	2.15	2	12.5	5.0	2.8				Pass
36								Market	New build	622	5	PA22 (Belford) Floor plans southern character area 16012.PA22.301	House	2	4	2	79	62	-21.5	2	1.9	-5.0	0			2	8.7	3.1	2.5				Fail
37								Market	New build	614	8	Apartments (plots 611-620 & 651-660 ground & first floor plans (Type A665)	Flat	2	3	1	61	61.9	1.5	2	0.6	-70.0	1	7.6	2.1	1	11	3.6					Fail
38								Market	New build	615	6	Apartments (plots 611-620 & 651-660 ground & first floor plans (Type A671)	Flat	2	4	1	70	62.5	-10.7	2	1.7	-15.0	0			2	9.5	3.5	3.5				Fail
39	Land At Harry Stoke Harry Stoke Road Stoke Gifford	PT17/5810/RM	Crest Nicholson South West	North Fringe	Stoke Gifford	763	Major	Market	New build	282	8	House type booklet - 0677-408 house type 910	House	3	5	2	93	82	-11.8	2.5	1.2	-52.0	1	5.2	2	2	9.4	3.3	3.0				Fail
40								Market	New build	302	11	House type booklet - 0677-420 House type Burnet	House	4	8	3	130	120	-7.7	3	2.3	-23.3	0			4	11.5	3.7	3.2	2.8	2.8		Fail
41								Market	New build	Multiple	33	Mixed Use Block 1 FF Plan - 13308/6310.2E - 2B.3P (61.3m.sq.)	Flat	2	3	1	61	61	0.0	2	2.8	40.0	1	8.4	2.3	1	12.8	3.6					Pass
42								Market	New build	Multiple	16	Apartment block 2 - first floor 13308/6301.2D	Flat	1	2	1	50	51.2	2.4	1.5	2.8	86.7	0			1	13.7	3.0					Pass
43	Parcels PL3, PL14a, PL14b And PL14c North Yate New Neighbourhood Yate	P22/02306/RM	Barratt Homes Bristol Diviso	Yate	Yate North	201	Major	Market	New build	Multiple	6	Plans & elevations - 0642-11-929 house type Maidstone	House	3	5	2	93	75	-19.4	2.5	2.4	-4.0	1	5	1.9	2	7.8	3.5	3.1				Fail
44								Market	New build	177	2	Plans & elevations - 0642-11-953 house type Kingsley	House	4	7	2	115	99	-13.9	3	2.4	-20.0	1	5.5	2.7	3	7.6	3.1	2.7	2.6			Fail
45								Market	New build	Multiple	9	Floor plan- 0642-11-904 Type A.2BF1 Block A	Flat	2	4	1	70	58	-17.1	2	2.7	35.0	0			2	9.4	3.2	3.1				Fail
46	Frenchay Hospital Beckspool Road Frenchay	PT17/5363/RM	Redrow Homes (South West)	East Fringe	Frenchay and Downend	162	Major	Market	New build	4034	8	House type A floor plans - HT.A.p	House	4	7	3	121	110	-9.1	3	6.6	120.0	1	7.1	2.3	3	9.4	4.0	3.4	3.4			Fail
47								Market	New build	4063	6	House types - G & H ground/first/second floor plans - HT.G-H.p	House	4	7	3	121	136	12.4	3	3.6	20.0	1	8.5	2.2	3	10.5	3.7	3.7	3.6			Fail
48								Market	New build	Multiple	6	Block E - plots 4023-4032.p A	Flat	1	2	1	50	47	-6.0	1.5	0.8	-46.7	0			1	11.5	3.7					Fail
49	Land West Of Gloucester Road Thornbury	P19/2524/RM	David Wilson Homes	Thornbury	Thornbury	130	Major	Market	New build	2	9	House type pack - P18-29-18_06-469BB1 REV:_ (house type 469)	House	4	8	2	124	140	12.9	3	4.1	36.7	0			4	8.4	4.0	3.9	3.8	3.1		Fail
50								Affordable	New build	9	12	House type pack - P18-29-18_06-SH521B REV:_ (house type SH52)	House	3	5	2	93	93	0.0	2.5	1.8	-28.0	1	8.5	2.2	2	11.7	3.0	2.3				Fail
51								Affordable	New build	Multiple	2	House type pack - P18-29-18_06-BLBFF REV:_ (house type Block B)	Flat	2	4	1	70	70	0.0	2	1.9	-5.0	0			2	12	4.1	4.1				Fail
Totals	**23 different applications**					**1601**					**258**																							