



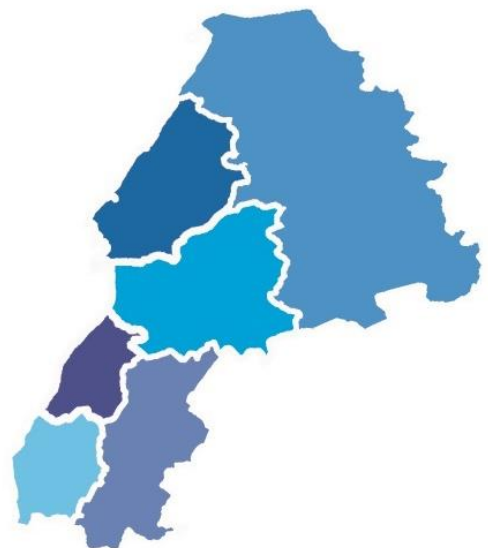
Allerdale Borough Council



Allerdale Local Plan (Part 2) Site Allocations

Optional Housing Standards Topic
Paper – update

January 2019



Contents

- 1.0 Introduction
 - Legislation Changes
 - Implications for the Local Plan
 - Purpose of this paper

- 2.0 Accessible and Adaptable Dwellings
 - Introduction
 - Allerdale Borough Council's Current Position
 - Evidence
 - Conclusion

- 3.0 Internal Space Standards
 - Introduction
 - Allerdale Borough Council's Current Position
 - Evidence
 - Conclusion

- 4.0 Water Efficiency
 - Introduction
 - Allerdale Borough Council's Current Position
 - Evidence
 - Conclusion

1.0 Introduction

Legislation Changes

1.1 In March 2015, a Ministerial Statement was issued outlining the steps the Government was taking in order to streamline the planning system following the conclusion of a national review of housing standards. The aim of this review was to simplify government regulations in order to reduce the levels of red tape for house builders. The key outcomes of the review included within the Deregulation Bill, which received Royal Assent on 26th March 2015, are:

- The option for Local Authorities to introduce an optional national space standard;
- The option for Local Authorities to exceed the minimum standards required by Building Regulations for water and access;
- An amendment of mandatory Building Regulations to cover the physical security of individual dwellings;
- The withdrawal of the Code for Sustainable Homes; and
- The withdrawal of Lifetime Homes.

1.2 In addition to these changes, the outcome of the review is that local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings¹.

Implications for the Local Plan

1.3 Following this review, Allerdale Borough Council now has a number of issues which it needs to address through the continued preparation of its Local Plan:

- Should the optional standards for accessible and adaptable dwellings be introduced?
- Should the optional standards for internal space standards be introduced?
- Should the optional standards relating to water efficiency be introduced?
- Any policy references which seek to impose any additional requirements for the security of individual dwellings will need to be deleted
- Any policy references to Code for Sustainable Homes will need to be deleted
- Any policy references to Lifetime Homes will need to be deleted
- References to any additional standards outside the building regulation regime or the new national space standards will need to be deleted

Purpose of this paper

1.4 In line with National Planning Policy Guidance, local planning authorities are required to gather evidence to determine whether there is a need for

¹ <https://www.gov.uk/government/speeches/planning-update-march-2015>

additional standards in their area, and to justify setting appropriate policies in Local Plans.

- 1.5 This paper will assess whether there is a need to introduce additional standards for accessible and adaptable dwellings; internal space; and water efficiency within Allerdale's Local Plan.

2.0 Accessible and Adaptable Dwellings

Introduction

2.1 The housing standards review has introduced two new optional categories within Approved Document M Volume 1 of the Building Regulations:

- M4(2) . Accessible and adaptable dwellings
 - Reasonable provision must be made for people to gain access to and use the dwelling and its facilities
 - The provision made must be sufficient to meet the needs of occupants with differing needs, including some older or disabled people; and to allow adaptation of the dwelling to meet the changing needs of occupants over time
- M4(3) . Wheelchair user dwellings
 - Reasonable provision must be made for people to gain access to and use the dwelling and its facilities
 - The provision made must be sufficient to allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs; or meet the needs of occupants who use wheelchairs

Allerdale Borough Council's Current Position

2.2 The Local Plan (Part 1) already supports and encourages development to incorporate it in its design the demands of a wide range of housing needs, including those with disabilities and an ageing population (see Figure 1).

S2 <i>Sustainable Development Principles</i>	The Council will: provide decent homes that meet the needs of households now and in the future
S4 <i>Design Principles</i>	Proposals for all new development (including conversions, extensions and alterations) will therefore be required to demonstrate high standards of design and must: make appropriate provision for those with reduced mobility and/or disabilities
S7 <i>A Mixed and Balanced Housing Market</i>	The Council will work with partners to promote sustainable, inclusive and mixed communities by ensuring that all new residential development contributes to improving the balance of housing and meets the identified needs of the whole community. The Local Plan will ensure the development of sustainable mixed communities by: making provision for the identified needs of an ageing population and ensuring that the specific requirements of different groups are met
S10 <i>Elderly Needs Housing</i>	In addition to the provision of specialist accommodation, the Council aims to ensure that older people are able to secure and sustain on-going independence either in their own homes or with the support of family members. To enable this, the Council will: e) Encourage the incorporation of Lifetime Homes Standards within all new residential development to enable new housing to be adaptable to meet household needs over time

DM14 <i>Standards of Good Design</i>	New development will be required to: e) Provide appropriate vehicular access, parking and turning arrangements and facilities for cyclists and pedestrians. Suitable consideration should also be given to providing appropriate access for those with disabilities
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Figure 1: Local Plan (Part 1) policies relating to housing design

2.3 However, no policy specifically requires housing to be built to a specified standard that can be easily adapted if future occupiers require it or for dwellings to be made accessible for wheelchair users. One option is to introduce a policy requiring a proportion of dwellings within a development to be built to ~~Category 2 (M4(2)) – Accessible and adaptable dwellings~~ and ~~M4(3) – Wheelchair user dwellings~~ as defined in the Building Regulations.

Evidence

2.4 In order to determine if there is a need to introduce these optional categories, there is a need to gather relevant evidence on a number of issues.

The likely future need for housing for older and disabled people (including wheelchair user dwellings)

2.5 Between 2006 and 2016, there was an increase of 4.6% in the number of people aged 65 and over living within Allerdale (see Figure 2). This is compared to a county wide increase of 4.55%, a decrease of 0.2% across the North West and a 2% increase in England and Wales. This shows that Allerdale has a population that is ageing quicker than areas locally, regionally and nationally.

		Under 65	65-74	75-84	85-89	90+	Total 65+
Allerdale	2006	80.80%	10.2%	6.7%	1.5%	0.70%	19.1%
	2016	76.3%	13.2%	7.53%	1.88%	1.09%	23.7%
Cumbria	2006	81%	10%	6.6%	1.6%	0.8%	19%
	2016	76.46%	13.02%	7.5%	1.91%	1.12%	23.55%
North West	2006	81.5%	10.6%	6%	1.3%	0.6%	18.5%
	2016	81.69%	10.14%	5.86%	1.48%	0.82%	18.3%
England and Wales	2006	84.1%	8.2%	5.6%	1.3%	0.7%	15.8%
	2016	82.1%	9.7%	5.7%	1.5%	0.9%	17.8%

Figure 2: Population for 2006 and mid-2016
(Source: ONS²)

2.6 According to projections released by the Office for National Statistics, Allerdale will have 31,000 people aged 65 and over; this is 9,000 people more than 2014 which represents a 9% increase from 23% of the overall Allerdale population in 2014 to 32% in 2039. Figure 3 clearly shows that this is a larger

increase than the North West (7% increase between 2014 and 2039) and England (6% increase between 2014 and 2039) indicating that Allerdale's population is growing older at a quicker pace than the regional and national levels.

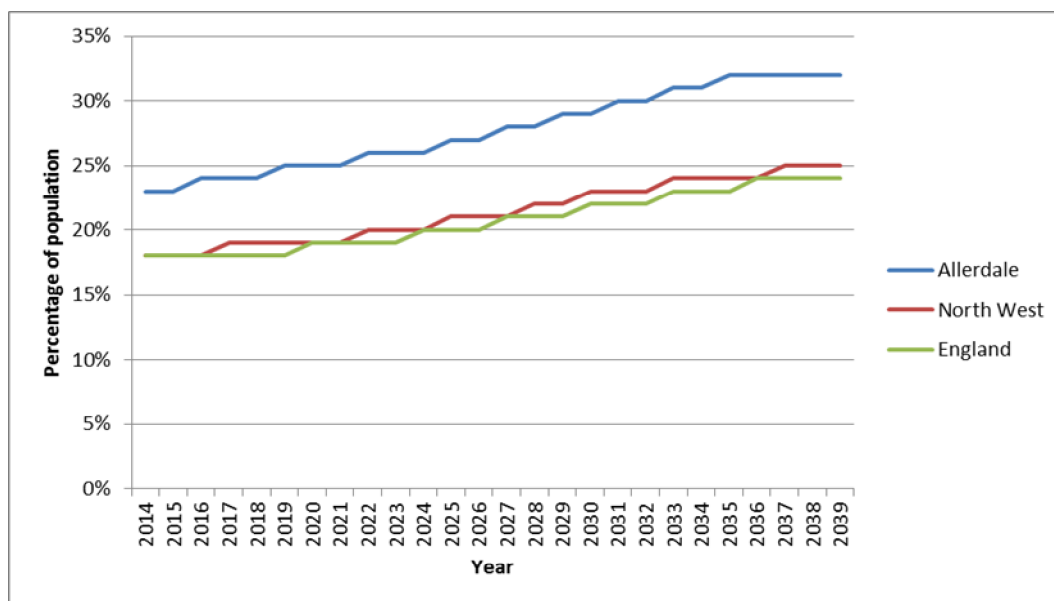


Figure 3: Percentage of population aged 65 and over between 2014-2039 in Allerdale, North West and England (Source: ONS³)

- 2.7 The forecast for an ageing population in Allerdale will have an impact on the housing provision within the district. There is evidence that mainstream housing often presents a challenging environment in which to age, exacerbating otherwise manageable illness and disability⁴. Given that older people tend to spend more time in their home than other age groups, it is important that the home environment is suitable and safe in order to allow them to live independently for longer.
- 2.8 In order to understand the needs of older people, evidence was taken from POPPI (Projecting Older People Population Information System) and PANSI (Projecting Adult Needs and Service Information System). Overall, it is expected that between 2017 and 2035, there will be an increase of 46% in the number of people aged 65 and over who will have mobility problems.

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<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthorities/nenglandtable2>

⁴ http://www.ilc-alliance.org/images/uploads/publication-pdfs/pdf_pdf_49.pdf

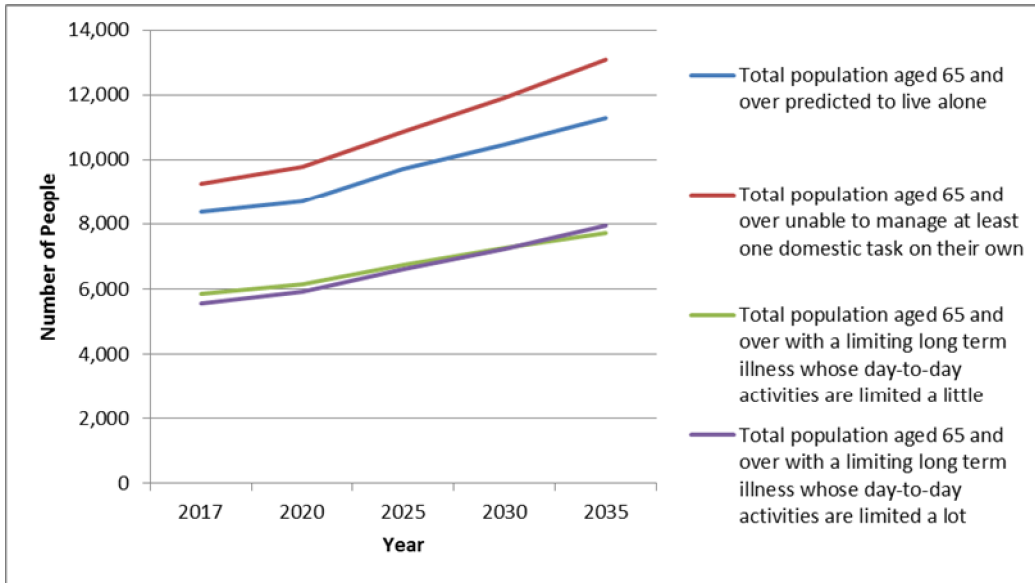


Figure 4: Health projections for older people in Allerdale until 2035 (Source: POPPI)

2.9 More specifically, it is predicted that by 2035 there will be a 41% increase in the number of older people unable to manage one domestic task (e.g. household shopping, clean windows, open screw tops, wash and dry dishes etc.). In terms of limiting long term illnesses, there will be an extra 32% of the population whose day-to-day activities will be limited a little, with an extra 42% whose day-to-day activities will be limited a lot (see Figure 4). However, it is not just physical problems which need to be considered. By 2035 it is predicted that 2,532 of Allerdale residents will suffer from dementia; this is a 65% increase of the 2017 figure of 1,536 (Figure 5).

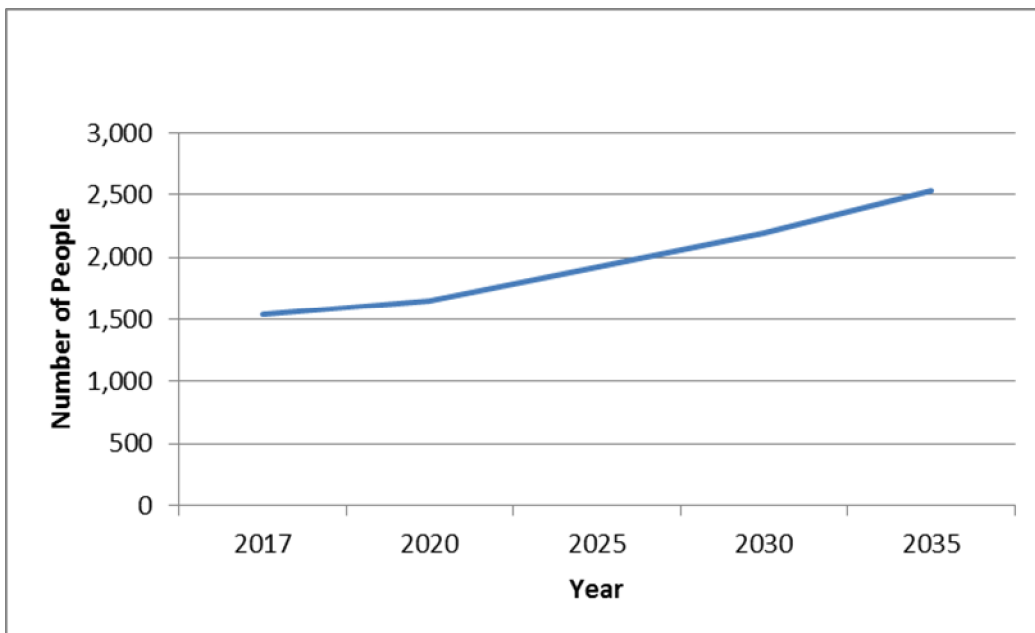


Figure 5: Number of people aged 65 and over predicted to have dementia by 2035 (Source: POPPI)

Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes)

2.10 In 2016, Allerdale Borough Council published a Housing Study⁵ which provides an up-to-date analysis of the housing situation across the borough. As part of the publication of the Study, a household survey was carried out which was completed by 5,557 households which represented a 17.3% response rate.

2.11 Figure 6 summarises the housing options that older people would consider over the next five years.

	% would consider		
	60-74 years	75+ years	Total
Continue to live in current home with support when needed	78.8	86.1	81.0
Buying a property on the open market	20.9	8.6	17.1
Rent a property from a private landlord	3.5	2.0	3.1
Rent from HA	8.7	8.9	8.7
Sheltered accommodation – To Rent	13.8	14.3	14.0
Sheltered accommodation – To Buy	13.3	11.5	12.8
Sheltered accommodation – Part Rent/Buy	4.8	4.2	4.6
Extra care housing – To Rent	9.5	11.3	10.1
Extra care housing – To Buy	9.0	9.5	9.1
Extra care housing – Part Rent/Buy	2.9	4.2	3.3
Residential care home	4.0	13.1	6.8
Co-housing	9.4	9.0	9.2
Total households	10,071	4,484	14,555

Figure 6: Housing options considered by older people (Source: Allerdale Borough Council Housing Study 2016)

2.12 It is clear to see that the preferred housing option for older people is to continue to live in their current home; the next most popular option is to buy a property on the open market. In order for homes on the open market to be suitable to allow people to remain in/move into them, there will need to be an increase in the number of homes that are accessible and adapted.

2.13 In terms of specialised homes, Cumbria County Council produced its Extra Care Housing and Supported Living Strategy⁶ in 2016. This identified that Allerdale has a shortfall of 429 places within Extra Care Housing to meet the predicted demand by 2025. There is also predicted to be a shortfall of 27 places for residential care and 17 places in supported living.

⁵ https://www.allerdale.gov.uk/downloads/Allerdale_Housing_Study_2016.pdf

⁶ <https://www.cumbria.gov.uk/elibrary/Content/Internet/327/6548/425289574.pdf>

The accessibility and adaptability of existing housing stock

- 2.14 Government research has identified older people as the main group needing adaptations to their homes to allow them to live independently⁷; given that older people spend 70-90% of their time in their homes it is important to ensure that homes can be satisfactorily adapted to allow them to live independently in a safe manner for as long as they want to. The type of house and the age of the property will affect how easy it will be to access and adapt existing housing stock but it is critical to assess this as by 2050, the majority of housing will have been built before 2000⁸.
- 2.15 The English Housing Survey 2014-2015⁹ identified that only 7% of homes in England possessed all four accessibility features that allow wheelchair access (also known as visitability). These four features are: a level access to the entrance; flush thresholds inside homes; sufficiently wide doorsets and circulation space; and a toilet on the ground floor.
- 2.16 Homes built after the changes to Building Regulations Part M in 1999 are more likely to include these features; it was considered not to be feasible for 55% of homes built before 1919 to be altered to include all four features.
- 2.17 Figure 7 summarises the age of properties in Allerdale. This shows that nearly 30% of Allerdale's housing stock pre-dates 1919 which has been identified as being the most difficult house type to be altered to include all four features. The more modern houses are more likely to include the features but this represents the smallest proportion of house types within the district (2005 onwards).

Pre-1919	29.6%
1919-1944	10.3%
1945-1964	19.4%
1965-1984	19.2%
1985-2004	15.4%
2005 onwards	6.2%

Figure 7: Age of properties within Allerdale (Source: Allerdale Borough Council Housing Study 2016)

- 2.18 The English Housing Survey identified 72% of the homes that lacked full visitability could be adapted to provide all four features, but 28% cannot.
- 2.19 Terraced homes are the most likely to not be feasible to be made fully visitable (50%); in addition 27% of flats, 15% of semi-detached homes and 14% of detached homes are unlikely to be able to be made fully visitable.

⁷ http://www.ilc-alliance.org/images/uploads/publication-pdfs/pdf_pdf_49.pdf

⁸ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/535187/gs-16-10-future-of-an-ageing-population.pdf

⁹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/539541/Adaptations_and_Accessibility_Report.pdf

2.20 If the English Housing Survey percentages are applied to the dwelling types in Allerdale, it would mean that approximately 22% (10,304 dwellings) of Allerdale's current housing stock for terraces, semi-detached and detached houses and flats could not be made fully visitable (see Figure 8).

Type of dwelling	Number of dwellings in Allerdale	Percentage of dwellings that cannot be made fully visitable (based on English Housing Survey)	Number of houses in Allerdale that cannot be made fully visitable
Detached house	9,844 (21%)	14%	1,378
Semi-detached house	13,046 (28%)	15%	1,956
Terraced house	12,180 (26%)	50%	6,090
Bungalow	7,117 (15%)	N/A	N/A
Flat/Apartment	3,261 (7%)	27%	880
Maisonette	139 (0.5%)	N/A	N/A
Caravan/ Park Home	170 (0.5%)	N/A	N/A
Other	330 (1%)	N/A	N/A

Figure 8: Type of properties within Allerdale (Source: Allerdale Borough Council Housing Study 2016)

How needs vary across different housing tenures

2.21 Nationally, the type of dwelling that is more likely to contain visitability features are those houses managed by Housing Associations (see Figure 9); 20% of dwellings in Allerdale are managed by Housing Associations (see Figure 10). This is supported by Figure 11 which shows that the residents in Allerdale that have long term health problems or disabilities, they are more likely to live in social rented accommodation compared to owner occupied and private rented dwellings.

2.22 Between 2015 and 2016, Government data for Social Rent General Needs¹⁰ showed out of 832 residents, 91 (11%) left their property as it was unsuitable due to ill health/disability, and a further eight (1%) people moved into accommodation with support. Eight people required a property to be fully wheelchair accessible, 66 (8%) people required a property to have level access housing and 38 (4.5%) people had other disability related requirements for a house.

2.23 One of the tenures least likely to have the visitability features is actually the tenure type which is more prolific in Allerdale which is owner occupied (69%).

¹⁰ <https://www.gov.uk/government/statistics/social-housing-lettings-in-england-april-2015-to-march-2016>

This suggests that more support will need to be given in the future to owner occupiers due to the ageing population.

	Number of visibility features				
	None	One	Two	Three	Four
Owner occupied	25.7%	42.0%	20.1%	7.1%	5.2%
Private rented	28.9%	34.6%	18.6%	9.9%	8.0%
Local Authority	23.1%	31.9%	20.5%	18.1%	6.5%
Housing Association	18.1%	27.6%	18.6%	17.5%	18.3%

Figure 9: Number of visibility features according to tenure (Source: English Housing Survey 2014-2015)

	Number of dwellings	Percentage of dwelling stock
Owner occupied	32,236	69%
Private rented	4,813	10%
Housing Association	8,633	20%
Shared Ownership	297	0.5%
Tied accommodation	415	1%

Figure 10: Tenure profile of occupied dwellings in Allerdale (Source: Allerdale Borough Council Housing Study 2016)

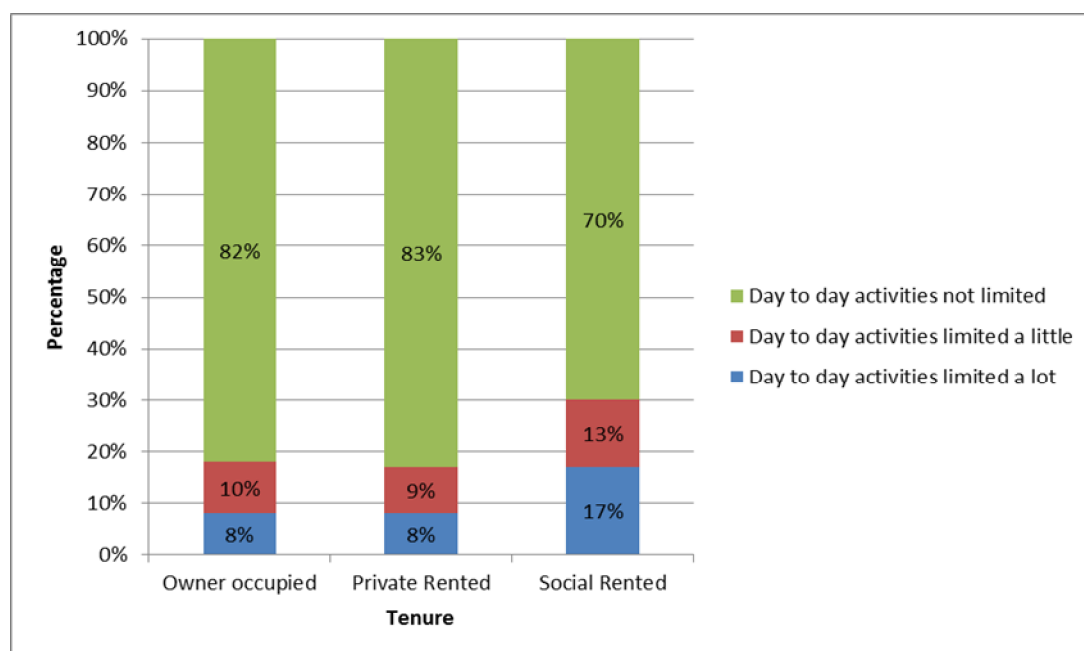


Figure 11: Long-term health problem or disability by housing tenure (Source: 2011 Census)

2.24 The Allerdale Housing Survey identified the adaptations required within the next 5 years according to age (see Figure 12). It is clear to see that many of the adaptations are minor requirements but that the requirement for all adaptations increases with age, with the exception of the adaptations to kitchen where the need for 65+ years residents is lower than under 65 years.

Adaptation required	Age group (% of households)	
	Under 65 years	65+ years
Lever door	1.7	1.7
Wheelchair access	2.4	3.4
Stair lift	3.0	7.3
Downstairs toilet	3.9	4.5
External handrails	4.0	7.9
Internal handrails	4.6	10.1
Adaptations to bathroom	6.7	10.8
Adaptations to kitchens	4.5	3.3

Figure 12: Adaptations required in the next 5 years by age group
(Source: 2016 Allerdale Housing Study)

Wheelchair users

- 2.25 It is difficult to identify the need for dwellings for wheelchair users at a local level. However, regional evidence is available for the North West within Habinteg's Mind the Step report¹¹. This report provides a formula to provide an indicative unmet need for wheelchair user housing within a local authority area.
- 2.26 Using the formula (see Figure 13), it is calculated that there are approximately 1,269 wheelchair user households within Allerdale. In the North West, 23% of wheelchair user households have unmet housing needs. Applying this to the 1,269 figure, this indicates that Allerdale has an unmet need of 292 houses.
- 2.27 In order to address the unmet need through the Local Plan, the 292 figure has been divided across the 18 year Local Plan period. This equates to 16 dwellings per annum which represents 5% of Allerdale's annual housing supply target of 304.

Number of households in local authority area	x	% of all households that are wheelchair user households in the North West	=	Number of wheelchair user households in local authority area
42,317	x	3%	=	1,269

Figure 13: Calculating the indicative number of wheelchair users households in Allerdale

- 2.28 The Habinteg report goes on to state that wheelchair users live in approximately 2.8% of households in England. However, given the fact that Allerdale's population is ageing quicker than the national average, it is considered that this figure will be higher in Allerdale. Therefore, it is proposed that 5% of houses where a total development yield on a site is 30 units or more should meet the requirements of M4(3).

¹¹ <https://www.habinteg.org.uk/news/mind-the-step-habinteg-takes-a-fresh-look-at-housing-for-wheelchair-users-388>

The impact on viability

- 2.29 Local planning authorities need to ensure that the requirements of Local Plan policies do not have a negative impact on the viability of future development to the point that it would stop development being deliverable.
- 2.30 Evidence within the English Housing Survey has shown that nearly 80% of dwellings could be made fully visitable for wheelchair users. With minor works, 14.4% could be made fully visitable, whilst 56.4% would require moderate works; 8.6% of dwellings would require major works.

M4(2) – Optional Requirement	Potential viability impact
Car parking and drop off and step free access	
M4(2) has an additional car parking and drop off requirement that requires at least one parking space that can be widened to 3.3m, a standard parking bay close to communal entrances with a clear access zone of 900mm, step free access between parking bay and dwelling entrance, and level or gently sloping parking bays with suitable surfacing.	There could be potential impacts on site layout in that there will be a need for additional external space for the car parking requirements and there could be the need for additional groundworks or land profiling on sloping sites. It is considered that the cost of the requirements and the potential to affect development density would be negligible.
Communal Entrances	
Communal entrance to be slightly wider. Also some extra requirements e.g. lower door entry controls, level landing area outside the entrance.	It is considered that the requirements can be met through design solutions without adding cost to the development.
Lifts	
This requirement specifies slightly larger lift sizes for communal lifts in flatted developments.	Due to the larger lift car size required, there will be an increased cost of purchasing the lift and an increased space demand within the development which could have a slight impact on the numbers of units that could be delivered.
Entrances	
M4(2) requires a slightly wider principal entrance door opening (850mm rather than 775mm) with a level external landing area that is at least partly covered and automatically lit (motion/dusk to dawn). Additionally some of the extra M4(2) requirements also apply to other entrances and not just the principal one.	There will be a small cost to the developer through the provision of larger doors and the installation of automatic sensor light and covered canopies.
Requirements for living, kitchen and eating areas	
M4(2) requires a living area to be provided on the entrance storey. It requires a minimum 1200mm clear space in front of and between kitchen	The potential need for a larger kitchen could be achieved through a well designed layout. There could be an effect on the delivery of three storey

units and appliances. It also requires glazing to the principal window of principal living area to start at a maximum 850mm above floor level.	townhouses due to the need to provide a living area on the entrance storey, but this is something that again be overcome through design.
Space requirements for bedrooms	
M4(2) requires every bedroom to provide a clear access route 750mm wide from the doorway to the window. For principal bedrooms it requires 750mm space on the sides and foot of the bed.	Larger bedrooms could be required which could increase the footprint of a dwelling, potentially affecting the development yield of a site.
Bathroom facilities	
M4(2) requires walls, ducts, boxings etc. in bathroom areas to be strong enough to support grab rails, seats and other future adaptations. In a 2/3 storey dwelling with 3+ bedrooms, bathrooms should have an installed level access shower or the potential for a level access shower. There are also some additional access zone requirements for bathroom layouts to ensure sufficient space. M4(2) also requires a bathroom to be located on the same floor as the principal bedroom.	A larger bathroom could be required which could increase the footprint of a dwelling, potentially affecting the development yield of a site.
Services and controls	
M4(2) sets additional standards in terms of the heights of window handles, boiler timer controls and thermostats.	It is considered that the requirements can be met through design solutions without adding cost to the development.

Figure 14 – potential viability issues with introducing optional M4(2) standards

- 2.31 The Viability Study carried out by Keppie Massie took the M4(2) and M4(3) requirements into account when calculating the viability of the proposed site allocations. The Study incorporated an additional amount of £1,100 per dwelling (reduced to £750 for apartments) for the provisions of M4(2) and this was applied to 100% of the dwellings tested.
- 2.32 For the requirements of M4(3), an allowance of £5,500 per dwelling was applied to 5% of the dwellings tested where the total development yield on a site is expected to be at least 30 units.
- 2.33 Following the viability testing, it was shown that a number of sites have a development surplus before developer contributions (with the exception of affordable housing) are considered. As with any Local Plan, there are less viable sites which have lower surpluses. This will mean that the requirements for M4(2) and, where applicable, M4(3) will need to be balanced with the demands of other developer contributions at the time of a planning application.

Implementation

- 2.34 From the date of the formal adoption of the Local Plan (Part 2), the Council will expect all relevant planning applications to conform to Policy SA5, unless material considerations indicate otherwise in line with the exceptions set out within the Policy.
- 2.35 For planning applications that have already been submitted and are currently undetermined or where schemes are at the early design/planning stage when the Local Plan (Part 2) is adopted, then the Council will determine an appropriate level of weight to give to Policy SA5 on a case-by-case basis given the viability and delivery issues which may arise from the requirement to amend schemes at these stages.
- 2.36 Whilst Building Control and Planning are two separate functions, the Council recognises the need for the two departments to work together to ensure that where the housing standards have been incorporated into planning permissions, that they are carried out as part of the development. Procedures are being developed between the two departments to ensure the implementation of the policy where it is required.

Compliance with Planning Practice Guidance

- 2.37 The Government issued a Planning Practice Guidance (PPG) note to provide advice on how local authorities can gather evidence to support the introduction of the optional technical standards.
- 2.38 The PPG identifies that local authorities should gather appropriate evidence from a wide range of datasets to justify the introduction of the optional technical standards based on the local housing need (Paragraphs 002, 005 and 007) and consider the impact of the introduction of the optional technical standards as part of the Local Plan viability assessment (Paragraph 003).
- 2.39 Policies should also take into account site specific factors which may make a site less suitable for the application of the requirements of M4(2) and M4(3) (Paragraph 008). Local Plan policies cannot seek to impose additional requirements other than those stated in M4(2) and M4(3) (Paragraph 008).
- 2.40 Paragraph 009 of the PPG states that Local Plan policies can only require dwellings to be wheelchair accessible where the local authority is responsible for allocating or nominating a person to live in that dwelling. Where this is not the case, the Local Plan policy can only require homes to be wheelchair adaptable.
- 2.41 It is considered that the introduction Policy SA5 of the Local Plan (Part 2) is supported by a robust and reliable evidence base which has taken data from a range of sources that shows that there is a need for Allerdale to introduce these optional housing standards. The Viability Assessment which has been undertaken to assess the policy requirements of the Local Plan (Part 2) does not show that the policy should be removed from the Local Plan (Part 2) on

viability grounds. The policy does make reference to the fact that there may be site specific issues which may need to be addressed in the implementation of the policy and that this will be considered during the determination of a planning application. Policy SA5 only includes the standards included in M4(2) and M4(3) and does not seek to introduce any additional requirements. The text in Policy SA5 has been amended slightly to reflect Paragraph 009.

Conclusion

- 2.42 The evidence has clearly shown that Allerdale has an ageing population. As a result of this, there is an increased need for housing suitable for older people due to the mobility and disability issues associated with an increase in age. The Infrastructure Delivery Plan produced to support the Local Plan (Part 2) shows that there is limited capacity within local elderly care and specialist homes. This means that it is even more important to incorporate these changes into new homes so that people can stay in their own homes for as long as possible and not be forced to leave properties which cannot support their living needs.
- 2.43 Whilst the main pressure for these changes comes from an ageing population, it is important to note that these changes will not just benefit the older population of Allerdale. The design changes required as part of M4(2) and M4(3) will provide benefits to those with young families and those with disabilities.
- 2.44 It is accepted that for some of the less viable sites, competing developer contributions will need to be balanced, but overall, the cost of implementing M4(2) and, where applicable, M4(3) would not prevent the Local Plan (Part 2) from delivering the identified housing need in Allerdale.

3.0 Internal Space Standards

Introduction

- 3.1 Across Europe, the UK has the smallest average house size¹² and a study released in December 2015 by the Royal Institute of British Architects stated that new homes are too small to meet the needs of residents¹³. Homes that are too small can have an impact on the quality of life and health and wellbeing of people living in them¹⁴.
- 3.2 In order to help address this issue, the Government has introduced optional national minimum internal space standards (see Figure 15)¹⁵ which can be included within Local Plans if authorities can prove that there is a need for them. However, this must be balanced against the potential benefits of smaller houses, including lower purchase prices and lower running costs which make the houses more affordable to a wider range of people.

Number of bedrooms	Number of bed spaces (persons)	1 storey dwellings (m ²)	2 storey dwellings (m ²)	3 storey dwellings (m ²)	Built-in storage (m ²)
1	1	39 (37)	N/A	N/A	1.0
	2	50	58	N/A	1.5
2	3	61	70	N/A	2.0
	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	3.0
	6	99	106	112	
	7	108	115	121	
	8	117	124	130	
5	5	103	110	116	3.5
	7	112	119	125	
	8	121	128	134	
6	7	116	123	129	4.0
	8	125	132	138	

Figure 15: Minimum gross internal floor areas and storage (Source: Department for Communities and Local Government)

Allerdale Borough Council's Current Position

- 3.3 Allerdale does not currently have an adopted planning policy which requires a minimum space standard for new dwellings.

¹² <http://www.independent.co.uk/money/spend-save/uk-homeowners-smaller-properties-prices-rise-housing-marking-future-downsizing-a7739926.html>

¹³ <https://www.architecture.com/-/media/gathercontent/space-standards-for-homes/additional-documents/homewisereport2015pdf.pdf>

¹⁴ <http://www.cam.ac.uk/research/news/study-finds-premise-behind-bedroom-tax-is-fundamentally-flawed>

¹⁵ <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>

Evidence

- 3.4 In order to determine if there is a need to introduce a minimum house standard in Allerdale, evidence was gathered from a sample of planning applications that were approved or commenced development between January 2015 and December 2017. Where floor spaces were available, they were compared against the optional national standard; Appendix A contains the assessment of 119 houses.
- 3.5 The 119 houses offered a wide range of housing units ranging from one bedroom units for two people to five bedrooms for ten people. Within this range, developers offer a choice with two bedroom houses for two or three people, three bedroom houses for five or six people and four bedroom houses for six, seven or eight people.
- 3.6 The results show that 69% of the houses assessed meet or exceed the suggested national standard. 15% of the houses failed to meet the standard by 10% or less, whilst 16% of the houses failed to meet the standard by more than 10%.

Number of bedrooms	Number of houses assessed	Met or exceeded national standard	Failed to meet national standard by 10% or less	Failed to meet national standard by more than 10%
One	4	3 (75%)	1 (25%)	0 (0%)
Two	35	21 (60%)	5 (14%)	9 (26%)
Three	38	19 (50%)	11 (29%)	8 (21%)
Four	41	38 (93%)	1 (2%)	2 (5%)
Five	1	1 (100%)	N/A	N/A
Total	119	82 (69%)	18 (15%)	19 (16%)

Figure 16: Assessment of permitted and newly constructed houses in Allerdale

- 3.7 Figure 16 shows that two and three bedroom houses are more likely to fail to meet the national standard, when compared to the larger houses.

The impact on viability

- 3.8 Ideally, all new houses constructed within Allerdale would meet the national standards. However, increased house sizes for those house types that do not currently meet the standards will have an impact on viability which needs to be considered.
- 3.9 A study commissioned by the Government has provided indicative costings of implementing the optional housing standard sizes and the potential developer recovery costs (see Figure 17)¹⁶. However, this will vary depending upon the viability of the area; in areas with reduced viability, the developer cost

¹⁶

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/353387/021c_Cost_Report_11th_Sept_2014_FL_NAL.pdf

recovery will be reduced. The table shows that as the amount of additional space provided increases, the potential recovery costs decreases.

	1 bedroom flat	2 bedroom flat	2 bedroom terrace	3 bedroom semi	4 bedroom detached
Total cost increase per m²					
<i>Total cost increase after space cost recovery</i>					
+ 1m²	+ £722 + £73	+ £722 + £73	+ £632 + £64	+ £632 + £64	+ £540 + £55
+ 2m²	+ £1,444 + £146	+ £1,444 + £146	+ £1,264 + £128	+ £1,264 + £128	+ £1,080 + £109
+ 3m²	+ £2,166 + £435	+ £2,166 + £435	+ £1,896 + £381	+ £1,896 + £381	+ £1,620 + £164
+ 5m²	+ £3,610 + £1,014	+ £3,610 + £1,014	+ £3,175 + £891	+ £3,175 + £891	+ £2,700 + £758
+ 10m²	+ £7,220 + £2,893	+ £7,220 + £2,893	+ £6,320 + £2,532	+ £6,320 + £2,532	+ £5,400 + £2,164

Figure 17: Additional space cost summary and space cost recovery

Conclusion

- 3.10 The evidence has shown that using the selected sample of recently approved planning applications nearly 69% of dwellings meet the national standard. 15% of the houses failed to meet the standard by 10% or less, with 16% of the houses failed to meet the standard by more than 10%.
- 3.11 Small increases in the size of dwellings would not have a significant impact on viability. However, requiring larger increases will begin to affect the density of development which could potentially result in fewer houses being built on a site which could affect viability.
- 3.12 If a new standard was introduced, the smaller houses which currently fall short of the national standard would be removed from the market. This would remove an element of choice for house buyers who might be looking for more of an affordable option.
- 3.13 The Council has decided not to introduce the minimum house standard size. However, it will continue to monitor the sizes of permitted dwellings and this will be re-assessed when the Local Plan is reviewed.

4.0 Water Efficiency

Introduction

- 4.1 Local Planning Authorities have the option to introduce optional standards for water efficiency that goes beyond the national standards so that there is a reduction from 125 litres per person, per day to 110 litres per person, per day. However, this can only be introduced where there is a clear, evidenced need in conjunction with consultation with local utility providers, and where the impact on viability has been considered.

Allerdale Borough Council's Current Position

- 4.2 The Local Plan (Part 1) does contain some reference to the role of developers in reducing levels of water consumption in construction.
- 4.3 Policy S2 (~~Sustainable Development Principles~~) states that the Council will encourage developers to incorporate the principles of sustainable construction to reduce water consumption+. Policy DM12 (~~Sustainable Construction~~) explains that development proposals will be expected to minimise the consumption of water by incorporating measures such as water efficiency and water harvesting/recycling devices+.
- 4.4 The supporting text for Policy DM12 states that a water supply deficit in West Cumbria has been identified and, whilst a long term solution has been identified, there is a need to manage demand and improve water efficiency until 2020. One of the identified methods to help achieve this was that new development should achieve at least a Level 4 in water conservation in the Code for Sustainable Homes assessment. However, as Code for Sustainable Homes has been withdrawn, the Council now relies on Policies S2 and DM12 and the current building regulations for water efficiency in developments.

Evidence

- 4.5 The Planning Practice Guidance identifies the primary sources of evidence to help local authorities determine if there is a need to introduce the optional standard.
- 4.6 The Environment Agency Water Stressed Areas Classification (July 2013) identified that United Utilities is currently under moderate stress. Future testing based upon future water usage and climate change scenarios was carried out which identified that United Utilities would remain under moderate stress. More specifically, Allerdale is not considered to be an area with serious water stress.

- 4.7 In March 2015, United Utilities produced its Final Water Resources Management Plan¹⁷ which is an assessment of the available water supplies and the demand for water between 2015 and 2040.
- 4.8 The report forecasted a deficit in the supply of water in the West Cumbria Resource Zone by 2040 unless new sources are developed and demand is reduced. The current abstraction license at Ennerdale will be revoked by the Environment Agency due to the need to protect the environment and prevent rare species from becoming extinct in England.
- 4.9 Three options have been assessed to address this deficit and to maintain an adequate public water supply for West Cumbria. The chosen option has been to transfer abstraction to Thirlmere. This will require a new water treatment works and a pipeline to transfer the water to Allerdale. It is expected that this will be completed to allow abstraction to cease at Ennerdale, and other places within West Cumbria, by 31 March 2022, although as with any project, there are risks which could delay this.
- 4.10 Given the planned works to address the deficit, there is not considered to be a water supply issue within the West Cumbria Resource Zone within which Allerdale sits.

Conclusion

- 4.11 After assessing the evidence available, and the planned works to address the predicted deficit, it is considered that there is no need to introduce the optional standard for water efficiency in Allerdale.

¹⁷ http://corporate.unitedutilities.com/globalassets/z_corporate-site/about-us-pdfs/water-resources/wrmpmainreport_acc17.pdf

Appendix A

Key

Meets or exceeds national standard	Fails to meet the standard by 10% or less	Fails to meet the standard by more than 10%
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Location	House Type	Bedrooms/People	Size (m ²)	National Standard (m ²)	Meets National Standard?
One Bedroom					
Bounty Avenue, Maryport	Flat 10/17	1 bedroom 2 people	59	50	Yes + 9m ²
Bounty Avenue, Maryport	Flat 03	1 bedroom 2 people	55	50	Yes + 5m ²
Bounty Avenue, Maryport	Flat 11/18	1 bedroom 2 people	54	50	Yes + 4m ²
Bounty Avenue, Maryport	Flat 08/15 Flat 09/16	1 bedroom 2 people	49	50	No - 1m ²
Two Bedroom					
James Duffield Close, Workington	Unit 8a	2 bedrooms 3 people	203	70	Yes + 133m ²
Land at Harglyn, Stainburn	N/A	2 bedrooms 4 people	204	79	Yes + 125m ²
The Hards, Aldoth, Silloth	N/A	2 bedrooms 4 people	181	70	Yes + 111m ²
James Duffield Close, Workington	Unit 8	2 bedrooms 3 people	123	70	Yes + 53m ²
Land adjacent to Firth View, Plumbland	N/A	2 bedrooms 4 people	117	79	Yes + 38m ²
Bounty Avenue, Maryport	Flat 04	2 bedrooms 3 people	77	61	Yes + 16m ²
Bounty Avenue, Maryport	Flat 02	2 bedrooms 3 people	75	61	Yes + 14m ²
Land adjoining King Street, Wigton	Kinver	2 bedrooms 4 people	93	79	Yes + 14m ²

Bounty Avenue, Maryport	Flat 10/17	2 bedrooms 3 people	73	61	Yes + 12m ²
Land adjoining King Street, Wigton	Grizedale	2 bedrooms 4 people	90	79	Yes + 11m ²
Bounty Avenue, Maryport	Flat 05	2 bedrooms 3 people	71	61	Yes + 10m ²
Bounty Avenue, Maryport	Flat 06	2 bedrooms 3 people	71	61	Yes + 10m ²
Bounty Avenue, Maryport	Flat 11/18	2 bedrooms 3 people	71	61	Yes + 10m ²
Land adjoining King Street, Wigton	Dallington	2 bedrooms 4 people	87	79	Yes + 8m ²
Former Corus Steel Works, Workington	Souter	2 bedroom 4 people	87	79	Yes + 8m ²
Land adjoining King Street, Wigton	Delamere	2 bedrooms 3 people	67	61	Yes + 6m ²
Bounty Avenue, Maryport	Flat 01	2 bedrooms 3 people	66	61	Yes + 5m ²
Bounty Avenue, Maryport	Flat 09/16	2 bedrooms 3 people	65	61	Yes + 4m ²
Land adjoining King Street, Wigton	Ashdown	2 bedrooms 4 people	81	79	Yes + 2m ²
Land at Salterbeck Road, Workington	D	2 bedrooms 4 people	80	79	Yes + 1m ²
Brigham Road, Cockermouth	D	2 bedrooms 3 people	70	70	Yes
Former Corus Steel Works, Workington	Moseley	2 bedrooms 3 people	69	70	No - 1m ²
Moor Road, Stainburn	B1	2 bedrooms 4 people	66	70	No - 4m ²
Wilsons Terrace, Broughton Moor	N/A	2 bedrooms 4 people	75	79	No - 4m ²

Strawberry How, Cockermouth	Hawthorn	2 bedrooms 3 people	65	70	No - 5m ²
Land off Moor Road, Stainburn	Hawthorn	2 bedrooms 3 people	65	70	No - 5m ²
Land adjoining King Street, Wigton	Gisburn	2 bedrooms 4 people	71	79	No - 8m ²
Land adjacent 8 Brough Street, Aspatria	N/A	2 bedrooms 4 people	70	79	No - 9m ²
Moor Road, Stainburn	Alder	2 bedrooms 3 people	60	70	No - 10m ²
Land adjoining King Street, Wigton	Heartwood	2 bedrooms 4 people	69	79	No - 10m ²
Abbott Wood, Great Clifton	N/A	2 bedrooms 4 people	68	79	No - 11m ²
Newlands Park, Dearham	Penrose	2 bedrooms 3 people	58	70	No - 12m ²
Land north east of Coachman Inn, Seaton	Epsom	2 bedrooms 4 people	66	79	No - 13m ²
Bounty Inn, Maryport	N/A	2 bedrooms 4 people	56	70	No - 14m ²
213-215 Moss Bay Road, Workington	N/A	2 bedrooms 3 people	75	61	No - 14m ²
Three Bedroom					
Land at Tallentire Hall, Tallentire	N/A	3 bedrooms 6 people	192	102	Yes + 90m ²
High Brackenthwaite Farm, Wigton	N/A	3 bedrooms 6 people	172	95	Yes + 77m ²
Moorhouse Hall, Wigton	N/A	3 bedrooms 4 people	140	84	Yes + 56m ²
Former Social and Education Centre, Aspatria	N/A	3 bedrooms 6 people	156	102	Yes + 54m ²
Workington Lawn Tennis	N/A	3 bedrooms	145	95	Yes

Club, Workington		6 people			+ 50m ²
Moor Road, Stainburn	Willow	3 bedrooms 6 people	146	102	Yes + 44m ²
Grey Abbey, Papcastle	N/A	3 bedrooms 6 people	138	102	Yes + 36m ²
Brigham Road, Cockermouth	A	3 bedrooms 5 people	127	93	Yes + 34m ²
Derwent Cross Lane	Plot 3	3 bedrooms 6 people	135	102	Yes + 33m ²
87 St. Helen's Street, Cockermouth	N/A	3 bedrooms 5 people	122	93	Yes + 29m ²
Land adjoining King Street, Wigton	Sherwood	3 bedrooms 5 people	114	93	Yes + 21m ²
Former Corus Steel Works, Workington	Chedworth	3 bedrooms 5 people	114	93	Yes + 21m ²
The Old School, Abbeytown	N/A	3 bedrooms 6 people	123	102	Yes + 21m ²
67 Kirkgate, Cockermouth	N/A	3 bedrooms 6 people	116	102	Yes + 14m ²
Wilson's Terrace, Broughton Moor	N/A	3 bedrooms 5 people	106	93	Yes + 13m ²
Land adjoining King Street, Wigton	Parkhurst	3 bedrooms 5 people	102	93	Yes + 9m ²
Land adjoining King Street, Wigton	Burnham	3 bedrooms 6 people	111	102	Yes + 9m ²
Land adjoining King Street, Wigton	Whinfell	3 bedrooms 6 people	110	102	Yes + 8m ²
Newlands Park, Dearham	Clandon	3 bedrooms 5 people	93	93	Yes
Strawberry How, Cockermouth	Hastings (detached)	3 bedrooms 5 people	91	93	No - 2m ²
Former Corus Steel Works,	Hatfield	3 bedrooms	90	93	No

Workington		5 people			- 3m ²
Newlands Park, Dearham	Hatfield	3 bedrooms 5 people	90	93	No - 3m ²
Land north east of Coachman Inn, Seaton	Banbury	3 bedrooms 6 people	99	102	No - 3m ²
Moor Road, Stainburn	Aspen	3 bedrooms 5 people	89	93	No - 4m ²
Land off Moor Road, Stainburn	Hastings	3 bedrooms 5 people	89	93	No - 4m ²
Strawberry How, Cockermouth	Hastings (semi- detached)	3 bedrooms 5 people	88	93	No - 5m ²
Moor Road, Stainburn	Elder (semi- detached)	3 bedrooms 6 people	96	102	No - 6m ²
Strawberry How, Cockermouth	Chester	3 bedrooms 6 people	96	102	No - 6m ²
Moor Road, Stainburn	B3	3 bedrooms 5 people	78	86	No - 8m ²
Strawberry How, Cockermouth	Rowan	3 bedrooms 5 people	84	93	No - 9m ²
Strawberry How, Cockermouth	Kingston	3 bedrooms 5 people	79	93	No - 14m ²
Moor Road, Stainburn	Juniper	3 bedrooms 5 people	79	93	No - 14m ²
Land off Moor Road, Stainburn	York	3 bedrooms 5 people	75	93	No - 18m ²
Former Corus Steel Works, Workington	Hanbury	3 bedrooms 5 people	71	93	No - 22m ²
Newlands Park, Dearham	Hanbury	3 bedrooms 5 people	71	93	No - 22m ²
Moor Road, Stainburn	Osier	3 bedrooms 5 people	66	93	No - 27m ²
Former Corus Steel Works,	Morden	3 bedrooms	51	93	No

Workington		5 people			- 42m ²
Former Corus Steel Works, Workington	Rufford	3 bedrooms 5 people	51	93	No - 42m ²
Four Bedroom					
The Borrans, Pardshaw	Plot 1	4 bedrooms 8 people	327	124	Yes + 203m ²
1 Longthwaite Nook, Cuddy Lonning, Wigton	N/A	4 bedrooms 8 people	228	124	Yes + 104m ²
Craika Road, Dearham	Plot 1 and 2	4 bedrooms 6 people	210	106	Yes + 104m ²
Land at Salterbeck Road, Workington	A	4 bedrooms 7 people	225	115	Yes + 110m ²
Craika Road, Dearham	Plot 3	4 bedrooms 6 people	207	106	Yes + 101m ²
Land at Salterbeck Road, Workington	B	4 bedrooms 7 people	200	115	Yes + 85m ²
Sutherland House, Kirkbride	N/A	4 bedrooms 6 people	180	106	Yes + 74m ²
Overcroft Farm, Greysouthern	N/A	4 bedrooms 8 people	191	124	Yes + 67m ²
Brigham Road, Cockermouth	C	4 bedrooms 7 people	179	115	Yes + 64m ²
Brigham Road, Cockermouth	C1	4 bedrooms 7 people	179	115	Yes + 64m ²
Land to the rear of Thorndene, Moor Road, Great Broughton	N/A	4 bedrooms 8 people	185	124	Yes + 61m ²
Strawberry How, Cockermouth	Richmond	4 bedrooms 8 people	170	124	Yes + 46m ²
Strawberry How, Cockermouth	Salisbury	4 bedrooms 8 people	169	124	Yes + 45m ²
Land off Moor Road,	Oxford	4 bedrooms	165	124	Yes

Stainburn		8 people			+ 41m ²
Wilsons Terrace, Broughton Moor	N/A	4 bedrooms 7 people	155	115	Yes + 40m ²
Strawberry How, Cockermouth	Balmoral	4 bedrooms 8 people	160	124	Yes + 36m ²
Moor Road, Stainburn	Beech	4 bedrooms 8 people	160	124	Yes + 36m ²
Strawberry How, Cockermouth	Taunton	4 bedrooms 7 people	147	115	Yes + 32m ²
Derwent Cross Lane	Plots 1 and 2	4 bedrooms 7 people	146	115	Yes + 31m ²
Land off Moor Road, Stainburn	Gosforth	4 bedrooms 7 people	142	115	Yes + 27m ²
Strawberry How, Cockermouth	Arundel	4 bedrooms 7 people	134	115	Yes + 19m ²
Strawberry How, Cockermouth	Warwick	4 bedrooms 7 people	130	115	Yes + 15m ²
Moor Road, Stainburn	Cedar	4 bedrooms 7 people	130	115	Yes + 15m ²
Land off Moor Road, Stainburn	Warwick	4 bedrooms 7 people	130	115	Yes + 15m ²
Land off Moor Road, Stainburn	Durham	4 bedrooms 7 people	127	115	Yes + 12m ²
Strawberry How, Cockermouth	Boston	4 bedrooms 7 people	126	115	Yes + 11m ²
Former Corus Steel Works, Workington	Winster	4 bedrooms 6 people	117	106	Yes + 11m ²
Newlands Park, Dearham	Winster	4 bedrooms 6 people	117	106	Yes + 11m ²
Land at Salterbeck Road, Workington	C	4 bedrooms 7 people	126	115	Yes + 11m ²
Moor Road, Stainburn	Ash	4 bedrooms	124	115	Yes

		7 people			+ 9m ²
Newlands Park, Dearham	Chedworth	4 bedrooms 6 people	115	106	Yes + 9m ²
Moor Road, Stainburn	Cypress	4 bedrooms 7 people	121	115	Yes + 6m ²
Beech House Farm, Blencogo	N/A	4 bedrooms 7 people	112	108	Yes + 4m ²
Moor Road, Stainburn	Hornbeam	4 bedrooms 7 people	117	115	Yes + 2m ²
Land adjoining King Street, Wigton	Arden	4 bedrooms 7 people	117	115	Yes + 2m ²
Newlands Park, Dearham	Crathorne	4 bedrooms 6 people	107	106	Yes + 1m ²
Strawberry How, Cockermouth	Wellington	4 bedrooms 7 people	115	115	Yes
Land off Moor Road, Stainburn	Wellington	4 bedrooms 7 people	115	115	Yes
Newlands Park, Dearham	Roseberry	4 bedrooms 6 people	102	106	No - 4m ²
Former Corus Steel Works, Workington	Roseberry	4 bedrooms 7 people	102	115	No - 13m ²
Newlands Park, Dearham	Penshaw	4 bedrooms 7 people	94	115	No - 21m ²
Five Bedroom					
Strawberry How, Cockermouth	Mayfair	5 bedrooms 10 people	177	128	Yes + 49m ²