

Consultation on the Regulation 18 Stage of the Housing Standards Development Plan Document (now part of the Core Strategy Review)

Introduction

Part 1 of this paper summarises what consultation activity was undertaken to advertise, notify and elicit opinion on the City Council's proposals for adopting the nationally described space standards and optional standards for accessible dwellings. Part 2 also sets out a summary of consultation responses received.

A formal 6 week period of consultation took place between 13th June 2016 and 28th July 2016, but wider engagement took place outside of these dates.

Part 1: Consultation Activity

The consultation activity undertaken divides into two categories: i) notification and awareness raising and ii) meetings with particular interest groups to explore and scope the issues.

Notifications and Awareness Raising

- i. Webpage. A webpage was added to Leeds City Council's website explaining the intention of the Plan to adopt the optional standards in relation to minimum internal space and accessibility, and setting out how and when people could comment, as well as the proposed timetable for preparing the Plan (see appendix 1)
- ii. PDF Leaflet. A leaflet was designed using the standard Leeds City Council LDF livery to catch attention. This was available on line, and circulated at meetings and with notification emails and letters (see appendix 2).
- iii. Notifications. Emails and letters were sent to over 800 people and organisations who had been involved in consultation on other planning documents including statutory consultees, councillors, MP/MEPs, businesses, housebuilders, agencies, media outlets, education bodies, planning consultants, environmental organisations, Aire Valley Leeds stakeholders, libraries and one-stop-shops and Town and Parish Councils.
- iv. Planning Magazine Article. An item was included in the 15th June 2016 edition of Planning Resource Magazine (see appendix 3).

Meetings with Interest Groups

Officers met with groups considered to have particular interest in the application of the national housing standards, including groups who represent occupiers likely to benefit from dwellings designed to minimum size and access standards, officers involved with area regeneration in Leeds and house builders who will have to adapt their building models to comply with the standards.

- i. Meeting with Leeds Older Persons Forum 13/5/16. Officers explained how the standards can only be introduced through a development plan process subject to examining impact on deliverability of dwellings, viability and need. Questions were raised around the nature of the viability study, need for bungalows and the potential to set minimum percentages of accessible dwellings. Subsequently, officers provided the Housing Standards Plan PDF leaflet for the forum to circulate to all its members (See appendix 4)
- ii. Meeting with the Access and Use-Ability Group 11/5/16. Officers explained how the standards can only be introduced through a development plan process subject to examining impact on deliverability of dwellings, viability and need; that Leeds is one of the first Local Authorities pursuing this. The Group welcomed the initiative and

commented that they would like to continue to be involved with the preparation process (See appendix 5).

- iii. Meeting with LCC Regeneration Officers 25/5/16. Officers explained the strands of evidence gathering underway to inform the plan preparation. Questions concerned whether separate minimum percentages of M4(2) and M4(3) dwellings are needed for affordable housing? It was suggested that consultation needs to include Registered Providers and LCC as a landowner. (See Appendix 6).
- iv. Meeting with Home Builders Federation 5/7/16. HBF representatives were familiar with the national space standards. Planning officers explained the timetable for introduction. Leeds' Access Officer explained more about the standards for accessible dwellings. Issues raised included:
 - a. Application of the standards in Leeds before policy adoption
 - b. Need for recognition that the policy could impact differently on different housing market areas
 - c. Concern about impact on affordability and viability including the impact of LCC's greenspace requirements
 - d. Need for a transition period to enable house builders to adapt their house types
 - e. The HBs research into customer satisfaction already reveals 63% satisfaction with internal layouts of new homes – is the policy really needed?
 - f. Need for consultation with specialist providers of retirement accommodation such as McCarthy and Stone

Appendix 1: Webpage for Housing Standards Development Plan Document

Consultation – Housing Standards Development Plan Document (DPD)

Housing Standards Development Plan Document

In 2015 the Government published as part of the Housing Standards Review, nationally described space standards and introduced new accessibility standards for dwellings. The Council's aspirations include growth and quality of housing and the Council has committed to prepare a Development Plan Document (DPD) which will allow the national standards to be applied to new housing development in Leeds.

Housing Standards Review

The National Housing Standards Review sets out optional standards in relation to minimum internal space requirements and accessible housing. National Planning Guidance is clear that these standards can only be progressed through the Local Plan process and require justification of need and viability before they can be adopted.

Current Consultation

The early consultation is primarily concerned with identifying the key issues facing Leeds and preparing evidence of need and viability for the Housing Standards DPD. This Plan seeks to introduce internal design standards for minimum size of dwellings and accessible housing. It is hoped that this initial consultation will encourage debate and identify further issues and options, view [early consultation flyer](#).

How to comment

The Plan is subject to formal public consultation for 6 weeks from **23rd June 2016 until 28th July 2016**

You are invited to respond in the following way:
By Email: LDF@leeds.gov.uk or alternatively by

Post: Housing Standards DPD, Plans and Policies Group, The Leonardo Building, 2 Rossington Street, Leeds, LS2 8HD.

Next Steps

The comments received as part of this consultation will inform the preparation of a Publication Draft Housing Standards DPD. There will be a further opportunity to comment during a formal public consultation period later this year. The broad production timetable is outlined below.

The Plan will be subject to Examination by an independent planning inspector who will adjudicate on whether it is "sound". This means checking that it has been prepared in the proper way, justified in terms of evidence, effective and consistent with national policy. In particular, the Inspector will need to judge if there is a need to introduce the standards and the effect on viability of housing development, taking into account all planning policy requirements.

Timetable

The broad timetable for preparing the Plan is as follows:

- i Evidence gathering, scoping and early consultation: Spring 2016
- ii Drafting the Plan for Publication: Summer 2016
- iii Formal public consultation (6 weeks) and assessment of comments: Autumn 2016
- iv Submission with any necessary modifications: Winter 2016/17
- v Examination: Summer 2017
- vi Adoption Summer/Autumn 2017 (subject to receipt of Inspector's report)

If you have any questions about the Plan please contact us at: ldf@leeds.gov.uk

Housing Standards Development Plan document

This Plan will introduce internal design standards for new houses and apartments. Decisions on planning applications will have to take account of the new standards on:
i) **minimum size of dwellings** ii) **accessible housing**

The Council intends to formally consult on the plan in the **Autumn 2016**. There is expected to be a public examination in **Spring 2017**.

During Spring – Summer 2016 the Council is preparing evidence of need and viability and is talking to people, groups and organisations with a particular interest.



to be involved please contact:

Robin Coghlan 0113 247 8131 robin.coghlan@leeds.gov.uk

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Rachel Smalley 0113 247 8102 rachel.smalley@leeds.gov.uk



Council to consult on new space standards

15 June 2016 by Jamie Carpenter, Be the First to Comment

Leeds City Council has launched a consultation on plans for a development plan document (DPD) that would seek to introduce internal design standards for new houses and apartments, including on the minimum size of dwellings.



Leeds: council to consult on internal space standards

An early consultation, which runs until 28 July, is primarily concerned with identifying key issues facing Leeds and preparing evidence of need and viability for the housing standards DPD, the council said.

A council document said that decisions on planning applications would have to take account of the new standards on minimum size of dwellings and accessible housing.

The consultation follows the publication last year of the government's national housing standards review, which sets out optional standards in relation to minimum internal space requirements and accessible housing.

Planning practice guidance says that, where a local planning authority wishes to require an internal space standard, they should only do so by reference in their local plan to the nationally described space standard.

The standards include a minimum gross internal floor area and built-in storage area of 84 square metres for a three-bedroom, two-storey home.

Housing Standards Plan – Early Engagement

Meeting with Leeds Older Peoples Forum 13/05/2016

Present:

Robin Coghlan LCC Planning Policy

Nasreen Yunis LCC Planning Policy

Rachel Smalley LCC Access Officer

Bill Rollinson Chair LOPF

John Wellham Vice Chair LOPF

What is the Housing Standards Plan?

Robin explained that the plan aims to introduce i) housing space standards and ii) housing access standards, in line with Government planning policy guidance.

Nasreen explained that local authorities can only introduce the full set of space standards described by the Government; they cannot introduce a partial or varied set of standards. Authorities have to demonstrate a need and show that housing development will remain viable.

Rachel explained the access standards. Previously there were 43 different access standards; different local authorities applied them differently. Hence, the Government replaced all these with a new set of optional standards. Three categories are specified:

- M4i “Visitable Dwellings” provide a baseline standard. It requires a downstairs loo, and higher positioned sockets
- M4ii “Accessible and Adoptable Standard” is roughly equivalent to “Lifetime Homes”. It requires level access, which means that upper floor flats require a lift, and requires larger loos and door widths. Useable for wheelchair users on a temporary basis. Adaptability means good widths and that toilet walls are reinforced for grab rails.
- M4iii “Wheelchair User Dwellings” which split into two sub-categories of “Adaptable” and “Accessible”. Market housing should be wheelchair adaptable so that all the equipment can be easily added if / when needed. Wheelchair accessible housing is only appropriate when wheelchair users are to take up occupation immediately, including local authority allocations.

Nasreen explained the timescales: Collation of the evidence of need and viability during Spring – Summer 2016. Publication of the plan in Autumn 2016 with a 6 week consultation period to follow. Submission of the plan for examination in public in Spring 2017 and adoption in Summer 2017.

Robin provided Bill & John with summary leaflets of what the Housing Standards Plan is about.

Questions from Bill & John

Q. Will the viability study be commissioned externally?

A. Yes, it needs professional expertise, to accord with RICS codes of practice and be robust enough for examination

Q. Can the plan require bungalows? There is a tremendous demand for bungalows.

A. The M4 ii and iii standards apply to all forms of housing. Housing doesn't have to be in bungalow form to be accessible. Bungalows take up land inefficiently, so would impact on viability. Therefore, a greater number of accessible dwellings can be provided as houses or flats than as bungalows.

Q. Would the optional accessibility standards be introduced as minimum percentages?

A. Yes. The percentages would be based on need and viability. The need evidence will take account of the aging population and trends of health conditions. Input will be sought from Public Health services.

**Access and Use-Ability Group (AUAG) Meeting
Wednesday 11 May 2016
Civic Hall, Room 4**

Present

Jag Passan (Independent Chair) – Chief Executive, Leeds Involving People
Maka Camm – Leeds Deaforum
Tim McSharry – Disability Hub
Mary Naylor - Disability Hub
Nathan Popple - Representing disabled young people
Rachel Smalley – Access Officer, City Development
Nasreen Yunis – Principle Planner, City Development
Alice Fox – Communities Team

Apologies

Khalid Ashraf – Leeds Deaforum
Terry Harton – Leeds Deaforum
Colin McDonnell - Representing disabled young people
Narran Saleem – Representing Moortown Primary School

1.0 Welcome and introductions

1.1 Jag welcomed everyone and introductions and apologies were made.

2.0 Matters Arising

2.1 The minutes were agreed to be an accurate account.

3.0 Supplementary Planning Guidance (SPG) – Rachel Smalley

4.0 Optional Housing Standards Development Plan - Nasreen Yunis

4.1 Nasreen explained that she works with the Forward Planning Implementation Team. She gave a brief introduction to the Optional Housing Standards Review.

In March 2015, the government set out a new approach to housing standards, the aim of simplifying standards as different local authorities have different approaches. The government is clear on what local authorities can and cannot do. We can look at minimum space for new build and also accessible housing only.

Leeds would like to adopt these national housing standards, and in order to do so, must demonstrate that there is a need for it. For example, we need to highlight if there a problem in Leeds where houses are too small, and demonstrate viability.

Nasreen explained that a government inspector has the final decision about if Leeds' proposal is robust. A report went to the Executive Board on 20 April and it was agreed to progress putting together a housing standards document. Nasreen will lead on the minimum space section and Rachel Smalley will lead on the access component.

They are aiming to have a draft plan by the end of the summer, and there will be a 6 week statutory public consultation in the autumn. Further modifications to the document will be made by the end of 2016, and the council will undergo an Examination in spring 2017 with adoption in summer 2017.

The AUAG agreed that they would like to be involved with this programme.

4.2 Nasreen said that they are currently undertaking the needs assessment. The government is very prescriptive and have set minimum space requirements. Leeds has the option of either adopting government standards or no standard at all. This is seen as a positive initiative for Leeds and we are ahead of most local authorities. Not all local authorities are adopting it.

4.3 Rachel explained that the accessible housing standards consist of 1 baseline standard and 2 optional standards. The baseline standard is mandatory and quite poor regarding access, for example, it does not enforce level access, or downstairs toilets etc.

The 2 optional standards are much better:

- Category 2 housing is very similar to the old lifetime homes standard. It is not designed for fulltime wheelchair users, but is relevant to households where wheelchair users visit, and to those with some mobility restrictions.
- Category 3 is aimed at wheelchair user dwellings that is either fully wheelchair accessible, or easily adaptable for wheelchair users.

Both Category 2 and 3 are easier and cheaper to adapt. All accessible housing standards can only apply to new build dwellings, and are not applicable to old buildings that are being converted into flats.

Rachel made it clear that the council has to deliver within the confines of what the government prescribe.

4.4 Tim said that he is confident that a good piece of work will be delivered. It is always good to have external independent support and there should be a partnership between them all. Nasreen stated that it's about the quality of housing.

Tim asked if some information can be circulated about the programme.

Action: Rachel and Nasreen to provide a summary of the Optional Housing Standards. They will come back to the AUAG with the pre-public consultation in September.

5.0 Greek Street site visit – Alice Fox

6.0 Review of Terms of Reference

7.0 Any Other Business

7.1 None

Next Meetings

Wednesday 15 June, 1-3pm, Room 1, Civic Hall – this meeting will focus on simplified spaces

Thursday 30 June, 5.30pm-6.30pm – site visit to Greek Street to view the layout that applies on

Thursday, Friday evenings and at weekends.

Appendix 6: Meeting with LCC Regeneration Officers

Housing Standards Plan – Early Engagement

Meeting with Regeneration / Housing Growth officers 25/05/2016

Present:

Robin Coghlan LCC Planning Policy

Adam Brannen LCC Regeneration

Maggie Gjessing LCC Regeneration

Mark Mills LCC Regeneration

Sarah May LCC Regeneration

Martin Blackett LCC Asset Management

What further evidence is needed to support the Housing Standards Plan?

Robin explained the strands of evidence gathering underway, i) viability, ii) measuring performance of permitted dwellings against NDSS, iii) effects on site design and capacity. A further strand would be understanding impact on housing affordability, particularly with regard to marginal housing markets where household affordability is limited.

It is accepted that the other evidence will help understand affordability and viability in marginal housing markets, but we could go further. One avenue would be to explore opinion of house builders known to work in marginal areas; Strata, Keepmoat and Gleeson were cited.

Other matters covered:

- What are other LAs doing? Only London has introduced Housing Standards so far.
- What is the evidence for requiring 30% M4(2) and 3% M4(3) dwellings? And is there a case for a tenure split between market and social housing?

Who else needs to be consulted?

- LCC as a house builder / land owner
- Registered Providers – Maggie and Sarah will advise best way to involve RPs

Next steps

Robin agreed to set out proposals for involving house builders, perhaps with structured questions, so that responses can be formally recorded as a piece of evidence

Leeds Housing Standards DPD Meeting with the HBF: Regulation 18 Consultation, 5th July 2016

Present:

Robin Coghlan (RC), Nasreen Yunis (NY), Daniel Golland (DG), Rachel Smalley (RS) - Leeds City Council (LCC)

Simon Grundy (SG) - WYG, interest in floorspace standards and student accommodation

Matthew Good (MG) - Home Builders Federation

Mark Jones (MJ) - Barratt Homes

CURRENT WEIGHT GIVEN TO PLANNING APPLICATIONS

SG raised concerns about space standards policy being applied to planning applications currently. Immediate application means effect of policy cannot be taken into account in land purchases. Not enough strong advice being given to Members. RC said we would pass on concerns to Steve Butler. There is inconsistency between panels and therefore produces uncertainty, which may be deterring investment. Issue has been raised in HBF letter of 7th March. The HBF welcome the introduction of DPD to provide certainty, but needs some intervention to help understand the current weight given to the standards. Hopefully LCC can reply soon.

STUDENT HOUSING

SG highlighted a concern about impact on student housing. SG states that an average scheme generally proposes studios at 28sqm. LCC members believe that there is an oversupply of student housing, however this ignores the shifting patterns of students from HMOs to central PBSA, and PBSA is releasing existing HMOs back to residential property. Westfield Road application has three standards – bronze, silver and gold standard. RC enquired about satisfactory surveys for student accommodation. SG said he would explore this. RC brought up the issue about interchange of student occupation and general market occupation. SG referenced the Kirkstall Design Centre application where size standards were a significant factor in the appeal decision.

CURRENT MARKET

MG stated that the market is in flux due to the decision to leave the EU, and the space standards may have a critical effect on any certainty. SG stated that there is a concern about land supply and any viability testing needs to be holistic.

TIMETABLE

The proposed timetable by NY was:

- Reg 18 formal 6 week period - 13th June to the 28th July
- Approval of document for formal 6 week consultation.
- Submission winter 2016-17
- Adoption Summer 2017

APPLICATION OF ACCESS STANDARDS

RS provided an overview of the M4(1), M4(2) and M4(3) standards. M4(2) is similar to lifetime homes (BS9266) but slightly less onerous. M4(3) divides into “adaptable” and “accessible”. The latter has to be kitted out with all equipment, and needs to be in dwellings that are to be allocated to wheelchair user households. There are however a lot of implementation issues e.g conversion of existing buildings, overlap of building regulations and planning. The FAQs in Ms document are also being changed.

GENERAL DISCUSSION ON SPACE STANDARDS

There is considerable concern about the impact of policy on different housing market areas. SG notes that development industry agrees there is a need for quality housing, but not at expense of non-delivery.

MJ brought up the RIBA surveys that asked lots of questions about housing standards, but may have ignored the issue of price in people’s preferences. Affordability has to be key. The size standards may limit choice, particularly at lower end of the market. There is also the impact of greenspace requirements. MJ states that there is a need for a transitional period and that it should be built in to adopted policy. House builders need time to adjust their house types, e.g. Barretts has 300 house types. MJ states that any post adoption transition period needs to be at least 12 months.

MJ highlighted that an independent Customer Satisfaction survey was taken by the HBF. The results state that 63% are very satisfied with the internal layout of their new home. The results also showed evidence that residents are satisfied with current levels of storage.

National Guidance footnotes were added in May 2016.

Regarding Greenspace Policy, SG mentioned that Hilltop Works has had issues with G4, however there was a pragmatic solution. However, generally a 80sqm/dwelling requirement does not work for high density housing schemes.

Regarding elderly person accommodation, there will probably be an impact on specialist providers. Therefore there is an agreed need for consultation with McCarthy & Stone.