Response ID ANON-B3JU-DSTW-P

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**
Submitted on **2019-05-13 14:02:53**

About You

What is your name?

Name:
N kola Miller

What is your organisation?

Organisation:
Homes for Scotland

On behalf of:

How can we contact you?

Email:
[redacted]

Telephone:
[redacted]

Address:
[redacted]

How to Complete

1 Introduction

Section 1 provides a context for the Main Issues Report Do you have any comments in relation to this section?

Do you have any comments in relation to this section?:
Homes for Scotland (HFS) supports a strong vision for the Local Development Plan (LDP) which makes clear links to the statutory requirement for compliance with the Strategic Development Plan (SDP), and which sets the tone for the Plan and the delivery of more homes in Aberdeen City to meet the need and demand that exists and to support sustainable economic growth of the City.

Paragraph 1.4 of the Proposed Plan on page 6 states that given the proposal in the new Planning Bill to abolish Supplementary Guidance (SG), the authority is seeking to review its current SG to bring some aspects of it into the LDP itself. HFS would caution against pre-empting too much detail of the Planning Bill given the level of uncertainty that remains about the future of the Bill and what it may or may not include. This not only relates to SG, but also to SDPs and their relationship with the LDP, and other key aspects affecting the delivery of an LDP.

The Council will be aware that, no doubt following the drafting of this MIR, the Local Government and Communities Committee dealing with amendments to the Planning Bill at Stage 2 voted to keep SDPs in place (despite the initial Bill promoting the abolition of these). There is therefore no certainty over what will or will not be included as the Planning Bill moves forward to Stage 3 and a further round of amendments when the Bill is heard in Parliament over the next few months. In addition to this uncertainty, it is unlikely that any of the provisions of the Bill, once it is finalised, will be enacted from day one given that there remains the lengthy process of drafting and consulting on secondary legislation to take place which will have to happen before the provisions within the Bill can be enacted. There will also be the process of drafting, consulting on and approving national guidance to support the aspirations and practicalities of the new planning regime, including a new Scottish Planning Policy and National Planning Framework 4.

HFS considers that the LDP must focus on the statutory obligations under the current planning regime for now given the level of uncertainty about the future of the planning system and what changes may occur. It is unl kely that any changes to the system will be in place before the estimated adoption of this LDP in early 2022.

HFS also considers that the LDP policies themselves should not be over complicated by adding in a lot of detail from current SG and that a balance must be struck. In the event that this LDP goes forward under the current planning regime, which is highly likely, this will be an opportunity for the Council to consolidate and rationalise its SG in consultation with stakeholders and communities.

2 Settlement Strategy

Question 1 New Housing Sites

Do you agree with our preferred housing sites? Are there any other sites that would be suitable for housing?:
HFS notes that the Settlement Strategy within the MIR, whilst taking up 10 pages of the document, is not a “Main Issue”. We query the omission of any specific main issue identification as part of the Settlement Strategy, particularly given that the MIR sets out Preferred Housing Sites on pages 8-9 of the document.

HFS understands that the housing land requirement, housing supply target and housing allowances for both Aberdeen and Aberdeenshire authorities, as well as for the Aberdeen Housing Market Area (AHMA) and the Rural Housing Market Area (RHMA), and the split between each HMA, are set at SDP level, therefore we do not seek to alter these or open these up for discussion as part of the MIR consultation process, but we would note that there are other parts of the Settlement Strategy beyond the specific housing land supply figures which ought to be considered through the MIR as formal issues, thus providing preferred and alternative options.

HFS would also note that these housing allowances (together with the housing land requirement and housing supply target) are subject to change through the process of the SDP Examination which will be underway shortly, therefore the Proposed LDP may require to plan for more homes than currently anticipated within the Proposed SDP.

The Proposed SDP sets a split between the AHMA and RHMA of 80% / 20% and would note that HFS submitted representations to the Proposed SDP which promoted a further increase to the split to an 85% / 15% split, with justification for this further increase provided in our representation (see attached as appendix). It will therefore be for the Reporter(s) to determine, through the SDP Examination process, what the split should be.
Furthermore, HFS also supported a different methodology for the calculation of the LDP allowances within representations to the SDP and provided alternative tables showing this alternative methodology, which would, if accepted by the Reporter(s) during the SDP Examination, amend the housing land requirement, housing supply target and the resulting LDP allowances for both the AHMA and RHMA. As with the housing market area splits, it may be that the allowances themselves are amended as a result of the examination of unresolved representations in the coming months.

HFS queries the Brownfield Urban Capacity Study undertaken as part of the preparation for the MIR. This study has not been consulted on, and does not form part of the MIR consultation formally, therefore there is little opportunity to comment on it. How do the sites within this Capacity Study relate to sites submitted by interested parties in the Call for Sites stage of the plan preparation process? Given that brownfield sites can be more challenging to deliver, has evidence been provided on the deliverability of each of the sites within the Capacity Study? HFS does not see any evidence of this, nor evidence of a strategy for the programming or timescales for the delivery of these sites.

HFS also queries the inclusion of a large proportion of sites within either local authority or NHS ownership noted as preferred sites. No evidence has been provided to show that these sites have been considered surplus to requirements by the institutional owner and the suitability of these sites for the delivery of homes. Some of these sites do not even have an indicative number of homes against them in the MIR, suggesting that this is not yet known and that the site is at a far earlier stage in the disposal process than would be required for inclusion within an LDP.

HFS believes that a range of sites should be allocated within the emerging LDP to ensure that housing need and demand in the City can be met over the plan period. An over-reliance on brownfield land for the delivery of homes with over 80% of the homes proposed by the Council to meet the SDP allowances coming from brownfield delivery is concerning. HFS would support a range of locations and sizes of sites being allocated to support the delivery of homes in Aberdeen.

In addition, given that housing supply is not a Main Issue within the MIR, there is no formal opportunity to comment on anything more than the preferred sites within the MIR – alternatives are not provided.

Question 2 Housing Allowances Beyond 2032

Is there a need for us to identify further Housing Allowances or sites for the period beyond 2032?:
The Proposed SDP provides an opportunity for “Strategic Reserve” land to be considered for longer term housing. Paragraph 4.20 of the Proposed SDP states “LDPs may choose to make provision for additional Strategic Reserves for Housing for the period 2033 to 2040, but this is not a requirement”. HFS notes that the MIR proposes (page 9) not to identify any new sites to meet the allowances for this timescale. Whilst we acknowledge that this is not a requirement, we suggest these could be useful to provide certainty for both home builders and communities on the potential future locations for development in the city. We are aware that Moray Council makes good use of its strategic ‘LONG’ allocations which are supported by the home building industry. These LONG allocations / reserved land should be allocated in marketable locations where, in the event of a shortfall in housing land, allocations in these areas which, if in marketable locations where people want to live and home builders can make a reasonable return, can be drawn down to meet that shortage. Aberdeen City historically has been good at identifying strategic reserve land and should continue with this long-established practice.

Question 3 Brownfield and other Opportunity Sites

Are there any further brownfield or other opportunity sites which would be suitable for redevelopment?:

Question 4 New Healthcare Facilities

Do you have any comments on these sites? Are there any other sites in these areas that we should be considering?:

3 Aberdeen City Centre and the Network of Centres

Question 5 City Centre Boundary

Do you agree the Local Development Plan should modify its City Centre boundary to match the City Centre boundary shown in the City Centre Masterplan?:

Question 6 City Centre Masterplan Intervention Areas

Do you agree that the City Centre Masterplan intervention areas should be identified as opportunity sites within the Local Development Plan?:

Question 7 City Centre Retail Core

Should the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres?:

Question 8 Union Street Frontages

Should the Union Street Frontages percentages be reviewed? Do the current target percentages ensure there is a balance between a strong retail focus and allowing for other uses? What other uses should we allow on the retail core area of Union Street:

Question 9 Out of Town Retailing

Should we direct high footfall uses to existing centres including the City Centre? Should we consider new out of town retail parks? What would the impact of these be on Union Street and the City Centre, and Aberdeen's network of centres?:

Question 10 Commercial Leisure Uses

Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?:

Question 11 City Centre Living

How can we encourage more people to live in the City Centre? Would a document outlining the principles which need to be applied in converting a building into residential use be helpful?:

MAIN ISSUE 1 Living in the City Centre

Should we include a policy in the Local Development Plan supporting residential development in the City Centre, including the conversion of upper and basement floors of premises to provide residential accommodation?:
HFS supports the inclusion of policy support within the emerging LDP for city centre living. This is already a commitment of the authority, through existing guidance, therefore does not represent a change of direction for policy within the city. We would note that city centre conversion or uptake of opportunity sites should not be promoted at the expense of land for new housing development to meet the need and demand identified within the SDP for new homes in the city. Of course, increasing city centre living will have positive placemaking, health and wel being impacts, but is unl kely to substantially support the delivery of homes in Aberdeen across the LDP plan period, therefore support for, and allocation of new homes across the city must also be promoted.

Not Answered

Question 12 Residential Development in the City Centre

Are there any other locations within the City Centre where residential accommodation could be provided?:

MAIN ISSUE 2 A 24-Hour City

Should 24-hour activities in Aberdeen be supported and encouraged to grow, especially in the City Centre? Could this be achieved through policy?:

Not Answered

Question 13 Encouraging the Creative Arts

What can we do to support and encourage the creative sector to ensure a range of distinctive experiences so that Aberdeen City Centre is like no other place?:

Question 14 Proposals for Creative Arts

Are there other buildings or areas within Aberdeen that could accommodate the existing, and support an emerging creative sector for desk-based and studio-based artists?:

Question 15 Percent for Art

To ensure Aberdeen City Centre retains its distinctiveness, should developments with construction costs of £1 million or over be required to allocate at least 1% of construction costs for the inclusion of art projects in a publicly accessible/ visible place or places within the development?:
HFS does not support the proposal in Question 15 of the MIR to include a requirement of at least 1% of construction costs (for developments with construction costs over £1m) to be allocated towards "the inclusion of art projects in a publicly accessible / visible place or places within the development". Whilst HFS supports placemaking aspirations of the plan, the requirement for 1% to be spent on public art is overly prescriptive and disproportionate to the benefit that would be achieved from the implementation of such a policy.

HFS understands, from discussions with planning officers, that the intention of this policy is for it to apply to larger scale commercial development within the city centre, however this intention is not clear from the MIR text nor the draft policy wording at Appendix 1.

We suggest that the LDP itself provides for a more flex ble way of delivering the placemaking aspirations of the council through new development, and rather than focussing on the level of funding that will be required to be spent on public art, focussing on the proposal itself.

MAIN ISSUE 3 Support for Visitor Attractions

To support our existing visitor attractions should Aberdeen have a policy about protecting and growing visitor attractions?:

Not Answered

4 Quality Places

MAIN ISSUE 4 Minimum Internal Space Standards for New Residential Development

How can we ensure that new residential development delivers an adequate amount of internal floor space for future occupants?:
HFS believes that, in the spirit of the placemaking agenda, housing development should be masterplan and design led, rather than led by prescriptive standards which may serve to homogenise development and the places which are created through new development.

We note that the MIR states that “the UK has the smallest homes by floor space area of any European country, with the average new build property covering just 76sqm…”. We understand the figure of 76 sqm to be a grossly outdated figure. As far as HFS is aware, the first mention of this 76sqm figure is back in 1996 in the “English House Condition Survey 1996”. There has also been a suggestion that this average figure dates back further to the early 80s. In addition, this is an English figure, not a UK figure, therefore we query its use in terms of justifying the Council’s assertion that the UK has the smallest homes by floor area than the rest of Europe. We are not aware of any up to date evidence which supports this average figure of 76sqm for new build home building.

HFS is not aware of specifically Scottish research that has been carried out regarding new build floor space averages, and how those have changed over time, nor are we aware of much UK based research. Savills published relevant research in its “Housing Market Note” in May 2015 (see attached as appendix to this representation). This looks at the size of homes, using England-based research. This paper provides evidence which refutes the Council’s reasoning within the MIR that support its preferred option in Main Issue 4.

We do not believe that there is a robust evidence base, or any data to support the assertions made regarding the average UK floor space, nor the assertion that the UK sits below all other European countries in terms of floor space area of new build homes. HFS believes the figure of 76sqm to be inaccurate and out of date, providing a misleading picture of new build housing delivery today.

In addition, there are other mechanisms which currently influence the floor space of a new home. Building Standards, whilst not setting out actual space standards, do contain minimum standards for a number of aspects of new homes. The Building Standards Technical Handbook (2015) sets minimum activity space standards within new housing, including bed space, wardrobe space and chest of drawer space which will influence the minimum size of a bedroom; kitchen manoeuvring space which will influence the size of a kitchen; bathroom activity space affecting the size of a bathroom; and access within buildings which will affect the corridor width of a property and therefore the floor space of that home.

HFS does not support the Council’s preferred option in Main Issue 4. We do not believe that this option is based on sound evidence and consider that it may negatively impact the viability of sites for housing unnecessarily, and also the affordability for potential purchasers. We query the introduction of this English voluntary benchmarking standard into a Scottish context without necessary research into how it translates across to the Scottish Building Standards and planning policy framework. HFS supports Option 1 – the current approach, which would allow for the continuation of a design led approach to delivering homes in the City.

Option 1 - Current Approach

Question 16 External Space Standards

Do you think that the amenity spaces currently delivered are of a sufficient quality? Should we strive for a better quality/ quantity of private/ semi-private residential amenity space across the city and refuse planning permission to proposals which do not meet our high standards? What standards would you like to see set for new dwellings, flats, and conversions in respect of quality and quantity of external amenity space?:
HFS considers that new development should continue to be delivered on a design-led basis without the introduction of overly prescriptive policies which may serve to homogenise the creation of place. HFS members support the placemaking agenda through the applications for residential development they submit and implement which include amenity space, open space, external finishings and garden space which is of a quality and quantity acceptable to both the applicant and the Council. Flexibility is valued in this respect, and we do not consider a more rigid approach through new policy will be beneficial.

Question 17 Natural Environment

Do you agree that the proposed list of policies for Natural Environment gives a clearer and more coherent structure than at present?:
The MIR proposes changes to the natural environment policies by renaming and consolidation. HFS considers that where new policies are proposed, these should have been included in Appendix 1 alongside other proposed new draft policies to give certainty and clarity and in order to be able to respond to Question 17 more effectively.

It is unclear therefore whether there are any changes proposed to Green Belt policy in the emerging LDP. For clarity, HFS does not consider that any enlargement to the Green Belt is warranted within the LDP given that the Strategic Development Plan does not provide any basis for Green Belt review.

Given the nationally recognised need to increase the delivery of homes across Scotland, HFS would support a suite of natural environment policies which not only protect and enhance the natural environment, but also acknowledge the positive benefits that the delivery of new homes will bring to the region in terms of increasing sustainable economic growth, and supporting national priorities.

Question 18 Food Growing

How can the Local Development Plan support the delivery of food growing projects in the City? Do you think food growing should be included in the next Plan by way of a new policy, or through existing policy and guidance?:

5 Transport and Infrastructure

Question 19 City Centre Parking

Should we reduce car parking in the City Centre to support the City Centre Masterplan? If so, how?:

MAIN ISSUE 5 Electric Vehicle Charging Infrastructure

How best can we encourage the provision of infrastructure to support changes in transport technologies? :
HFS does not support the preferred option of increasing the vehicle charging infrastructure for all new developments that provide parking.

HFS members have indicated that in some circumstances, it will be appropriate to include electric vehicle (EV) charging within their developments, however we do not consider that a blanket policy should be introduced to require these facilities in all housing developments.

Distr bution network operators have noted concerns regarding the ability of their network to accommodate the peak energy loads for EV charging. Therefore, the inclusion of an LDP policy requiring all new developments which provide parking to provide for EV charging may exacerbate such issues and require significant network reinforcement if undertaken at scale.

In addition, Building Standards is already considering requirements and standards around EV charging points as part of its review for the next set of Standards which will come into effect in 2021. It is essential that planning policy does not result in pigeon-holing of current technology, which is continuously evolving, adding potentially unreasonable costs to developers to install technology which may not be suitable in the future. Planning policy should not be used to duplicate or pre-empt what Building Standards requirements are or will be and must be cognisant of grid capacity issues to ensure that policies are achievable.

A more appropriate approach would be to ensure that housing and other development sites are adaptable to allow retrofitting of renewable technologies where appropriate rather than requiring all new housing developments to include such technology. A more flexible policy within the LDP would avoid current unknowns such as timescales for grid capacity upgrading, issues of expected battery life increases resulting in fewer domestic EV charging points being required, and other issues to render the policy undeliverable, ensuring that the LDP is more able to adjust to technological advances in the future.

Option 1 - Current Approach

Question 20 Digital Infrastructure

Should high speed broadband be mandatory in all new residential developments with 5 or more units? Do you wish to suggest any other proposed changes to the Digital Infrastructure and Telecommunications Infrastructure policies?:
HFS supports digital connectivity, however, would caution against an LDP policy placing a burden on homebuilders which is not within the control of the developer. Instead of introducing any policy making high speed broadband mandatory, work should be carried out by the Council with infrastructure providers to ensure that this is possible, and that networks are in place to support all new development coming forward in Aberdeen City being capable of hosting high speed broadband.

Question 21 Developer Obligations and Infrastructure Delivery

Do we need to change our approach to securing developer obligations for future development proposals?:
HFS notes that this section of the MIR references potential changes to the Scottish Planning System which “may also propose new or different ways in which Councils plan new infrastructure”. Given that this is unknown at this stage, we do not believe this should be a consideration for the current LDP. It is not possible to pre-empt what the Planning Bill will include if and when it is enacted, given the significant amendments at Stage 2, and the emerging Stage 3 process in coming months. It is also not possible at this stage to predict what secondary legislation will be required to cover, when this will be implemented, the timescales of associated guidance and national policy, and the content of such. It is not currently possible for the Aberdeen LDP 2022 to take on board changes to planning legislation and guidance which are currently unknown.
HFS and its members support planning for new infrastructure to support the delivery of new homes across Aberdeen, and consider that the Council’s approach to developer obligations should be clearly set out in a draft Supplementary Guidance and consulted upon at the relevant stage of the plan making process, if the process and approach is to change.

Home builders understand the need to mitigate against the impact of development, however that mitigation must be proportionate and related to the development in question, with the public sector accepting its proportionate role in delivering necessary infrastructure to support communities. Unnecessary and disproportionate burdens should not be placed on the development industry, and the positive outcomes of the delivery of new homes must be recognised.

6 Resource and Business Policy

MAIN ISSUE 6 Low and Zero Carbon Generating Technologies and Water Efficiency

Should the requirement of existing Policy R7 be changed?:
HFS supports Option 1 – the current approach over the preferred option, or Option 3 for this Main Issue.

New build housing, through Building Standards, have already reduced carbon emissions by 75% on the 1990 baseline standard through the staged improvement of fabric efficiency standards as well as promotion of LZCEGT (decentralised) and LZC energy sources (network). The home building industry is already working closely with stakeholders to better understand technologies as they become mainstreamed as well as to set out a pathway to climate change objectives. Reducing emissions further will inevitably be challenging as the cost-effectiveness of solutions becomes more limited (i.e. the cost of technologies against the carbon reduction impact).

Imposing further burdens through the planning system will only go to create additional barriers to the delivery of new housing. Building Standards remains the best framework to address carbon reduction through new construction given that it is more reactive and adaptable to new technologies providing a national baseline for the step change in standards to reach 2032 and 2050 climate change targets. For example, the review of Building Standards is already underway with the next set of standard set to be introduced by 2021, and the main calculation methodology SAP11, set for launch in 2022 is currently being developed.

Given the industry is already meeting the requirements of policy R7, HFS advocates that the authority does nothing, as the increases in Building Standards will assist in fulfilling the authority's objective of reducing carbon emissions. On that basis option 1 should be maintained.

Option 1 - Current Approach

Question 22 Low and Zero Carbon Generating Technologies and Water Efficiency

What methodology should the Council use in calculating compliance with Policy R7, specifically how should the target of reducing carbon dioxide levels be calculated?:
Standard Assessment Procedure (SAP) already provides the robust calculation methodology for addressing compliance with Policy R7. Additional methodologies or information requests within planning policy would simply duplicate this outcome of the development process.

Question 23 Solar Farm Developments

Do you agree that Solar Farms should be supported within the Council's policy on Renewable and Low Carbon Energy developments, and should specific guidance be included within Policy R8?:

MAIN ISSUE 7 Heat Networks

Should we include a policy in the Local Development Plan supporting the development of Heat Networks within the City?:
The preferred option (Option 2) for this Main Issue refers to a policy in Appendix 1 of the MIR, however none if the proposed new draft policies in Appendix 1 relate to Heat Networks.

HFS queries the evidence base behind the preferred option regarding Heat Networks. No evidence is provided within the MIR or by the Council to show that heat networks can work beyond the institutional examples currently in place in the City. What type of development does the Council envisage will enter into an existing or new heat network, and how will this work in practice? Given the "significant infrastructural investment" of heat networks, as noted in the MIR text, how will these new or expanded networks be funded and maintained? HFS does not support the inclusion of an LDP policy on Heat Networks without appropriate research and evidence shown to support the effective delivery of such networks for new development.

As new homes become more energy efficient, the business case for heat networks becomes obsolete. Estimated energy costs for new build homes constructed to 2015 standards are already around one third of that of the national average, and as new homes become more efficient and incorporate use of LZC heat energy such as ASHP this will reduce even further.

The Scottish Government is currently developing a national approach to the development of Local Heat and Energy Efficiency Strategies (LHEES) which will set out an approach to decarbonising heat energy.

HFS supports Option 1 – the current approach. This would allow for heat networks to come forward for appropriate developments, but would not require heat networks to be created when these are not viable, appropriate, or deliverable.

Option 1 - Current Approach

Question 24 Supporting Business and Industrial Development

Should we carry forward our current policy approach to safeguarding existing business and industrial areas from other development pressures into the next Local Development Plan?:

MAIN ISSUE 8 West End Office Area

Should the policy support a mix of uses in the West End Office Area? If so, what types?:

Not Answered

7 Affordable Housing

Question 25 Affordable Housing

Do you agree with the Local Development Plan's current affordable housing approach being carried forward? What other measures could the Council consider in order to assist with the delivery of affordable housing units via the Plan? Should the threshold of not applying affordable housing requirements to developments smaller than 5 units remain in place?:
Scottish Planning Policy (SPP) states that the "level of affordable housing required as a contribution within a market site should generally be no more than 25% of the total number of houses" (paragraph 129). As such, HFS supported the proposed SDP which was in line with SPP in stating 25% affordable housing contributions, and we would support a level of 25% within the Aberdeen City LDP. It is important that the Plan acknowledges the significant contribution that the private sector makes to the delivery of affordable housing in across Scotland, and also in Aberdeen. A significant percentage of affordable housing is delivered through Section 75 contributions made by the affordable housing contr bution from market sites. Therefore, there is a fine balance to encouraging the delivery of market homes (of which there is also a defined need and demand) which will, in turn, support the delivery of affordable homes in Aberdeen City through the

affordable housing policy.

HFS supports the existing approach of 25% affordable homes on sites greater than 20 units and would continue to support the threshold of no affordable housing requirements for developments of under 5 units remaining in place to support SME development in the city.

Question 26 Private Rented Accommodation and Build to Rent

Are there ways that the Local Development Plan can facilitate Build to Rent development, through policy?:
The Build to Rent Opportunity in Scotland report (available on the HFS website under projects) sets out the role BTR can play in addressing housing need and demand in Scotland. As part of this work the Scottish Government's Chief Planner already set out Planning Delivery Advice on Build to Rent to help explain this new housing typology, to encourage a flexible approach to design standards and developer contributions more reflective of this tenure. It also asked authorities to consider the opportunities available to them to provide affordable housing contr butions under the management of a single, professional landlord within an undifferentiated service, tenure-blind development model.

8 Sustainable Mixed Communities

MAIN ISSUE 9 Inclusive Housing Mix (Housing for the Elderly and Accessible Housing)

How can the Local Development Plan ensure a greater mix of housing types is achieved in new developments?:
HFS supports Option 1, the current approach, for this Main Issue. The current approach recognises that home builders will build homes according to what they believe will sell in particular circumstances. This is based on the market in that particular location, and at that time, and should not be prescribed by a policy.

HFS does not support setting a minimum requirement for a housing mix within an LDP policy as set out in the preferred option. Stipulating the mix of units on a private development site could impact the viability of the site if the mix is not in line with market demand on that site.

Further, the preferred option begins to overlap with Building Standards where it refers to "units that can be demonstrated as 'adaptable' for varying needs, or designed for lifetime living…" New homes are already designed to be adaptable to the changing circumstances of occupants. Building Standards (since 2007) has incorporated Housing for Varying Needs and Lifetime Homes Standards (bar two aspects). Therefore, any new home will comply with the criteria set out within the preferred option since this duplicates Building Standards current practice and requirements.

Option 1 - Current Approach

MAIN ISSUE 10 Residential Care Facilities

How should the Local Development Plan cater for proposals relating to Residential Care Facilities?:

Not Answered

MAIN ISSUE 11 Student Accommodation

How can the Local Development Plan cater to proposals relating to student accommodation?:

Not Answered

MAIN ISSUE 12 Houses in Multiple Occupation

How can the Local Development Plan support sustainable mixed communities, with regards to HMOs?:

Not Answered

Percentage limit of HMOs in each area:

Please explain why you chose your answer:

Geographical boundary of each area:

Please explain why you chose your answer:

Threshold for when planning permission is required for a HMO:

Please explain why you chose your answer:

Question 27 Community Planning

Is there anything else that the Local Development Plan can do to support the objectives of the LOIP or the aims of Community Planning?:

Question 28 Changing Places Toilets

Should large new developments that require public access provide Changing Places toilets? What types of venues should provide them?:

Appendix 1 Proposed Draft New Policies

Policy D2 Amenity

Do you have any comments on the policy?:

Policy D5 Advertisements and Signage

Do you have any comments on the policy?:

Policy D8 Shopfronts

Do you have any comments on the policy?:

Policy D9 Windows and Doors

Do you have any comments on the policy?:

Policy H4 Housing Mix and Housing for Particular Needs

Do you have any comments on the policy?:
As set out above in response to Main Issue 9, HFS does not believe that planning policy should duplicate Building Standards requirements and, as such, does not support the wording within this draft policy.

Policy H8 Residential Care Facilities

Do you have any comments on the policy?:

Policy H9 Student Accommodation Developments

Do you have any comments on the policy?:

Policy H10 Houses in Multiple Occupation

Do you have any comments on the policy?:

Policy NC9 City Centre Living

Do you have any comments on the policy?:

Policy NC10 24-hour City

Do you have any comments on the policy?:

Policy NC11 Visitor Attractions and Facilities

Do you have any comments on the policy?:

Policy NC12 Public Art Contribution

Do you have any comments on the policy?:
As set out above in response to Question 15 re the potential introduction of at least 1% of construction costs to be allocated towards art projects in the development, HFS does not support this proposal and considers it to be overly rigid and inflexible. Instead of focussing on the level of contribution to public art, the emphasis should be on the proposals themselves and the positive aspects that the proposed development will bring to placemaking in the area. HFS understands, from discussions with planning officers, that the intention of this policy is for it to apply to larger scale commercial development within the city centre, however this intention is not clear from the MIR text nor the draft policy wording at Appendix 1.

Additional Documents

Please include comments on other documents below:

Please include comments on other documents below::

Additional Files

If you have further information you would like to provide you may upload it here.:
Savills Housing Market Note - May 2015.pdf was uploaded

Housing Market Note

Size Matters

How Big Are Our Houses?

Neal Hudson
Associate Director
07590 531150
nhudson@savills.com
@resi_analyst

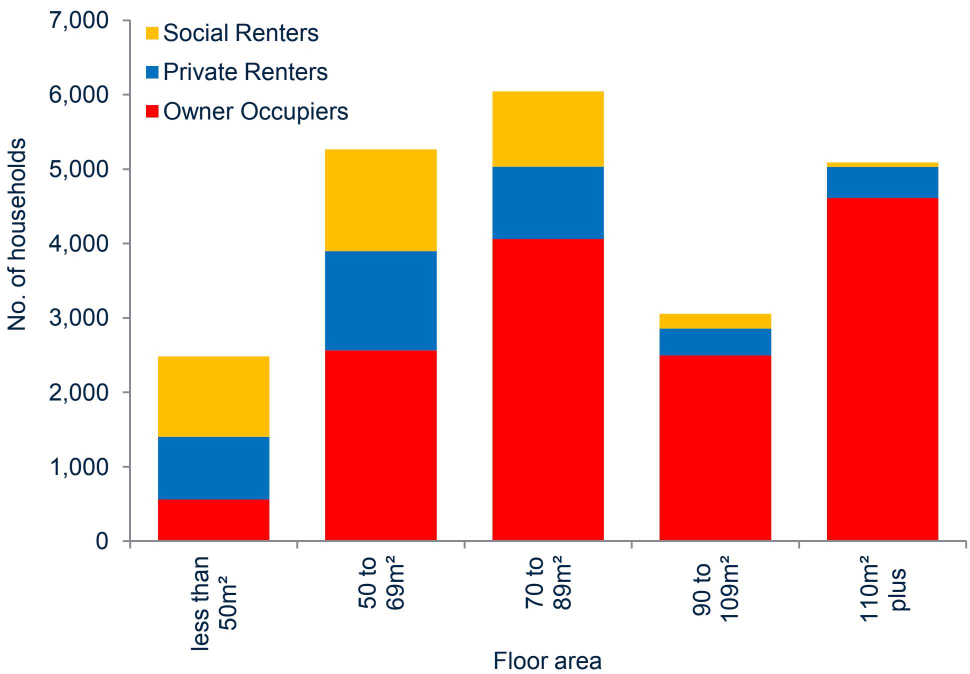
It is now easier than ever to find out how much your new neighbours paid for their house thanks to online data. It is far trickier finding out if the house is comparable to yours in size. Land Registry house price data is invaluable but unfortunately it only records the type of property sold e.g. detached, semi-detached, terraced or flat.

If you're lucky, the property details will still be on an agent's/listing website with a floor plan. Aside from third parties with access to mortgage lending data, there is no easy publicly accessible way to find out how big an individual property is. Wider access to floor area data would improve transparency in pricing by allowing people to quickly compare house prices on a £ per m² or ft² basis.

So how big are our homes? The 2012/13 English Housing Survey provides some useful evidence for England and indicates that the mean property floor area is 92.3 m² (993.5 ft²). For comparison, the 2011/12 survey indicates that an average floor area for flats is 56.9 m², for terraced houses is 82.6 m², for semi-detached houses is 93.2 m² and for detached houses is 151.7 m².

As with any average, that figure doesn't tell us much about the distribution of property sizes. Fig 1 below shows the distribution tending towards smaller homes and highlights the divergence by tenure. The average size of an owner occupied home is 105 m², a private rented home is 74 m² and a local authority home is 63 m². Some of that difference will be accounted for by the different mix of property types (e.g. flats versus houses) in each tenure but it is perhaps not surprising that higher levels of overcrowding are found in the two rental tenures.

Fig 1 – Distribution of Housing Stock by Floor Area & Tenure, England 2012



Source: English Housing Survey 2012-13

Dwelling Size (m²) 2012	
Cyprus	141.4
Luxembourg	131.1
Iceland	130.4
Belgium	124.3
Norway	123.2
Switzerland	117.1
Denmark	115.6
Netherlands	106.7
Portugal	106.4
Sweden	103.3
Austria	99.7
Spain	99.1
Germany	94.3
France	93.7
Italy	93.7
England	**92.3**
Greece	88.6
Finland	88.6
Slovakia	87.4
Croatia	81.6
Ireland	80.8
Slovenia	80.3
Czech Republic	78.0
Hungary	77.4
Poland	75.2
Bulgaria	73.0
Estonia	66.7
Lithuania	63.2
Latvia	62.5
Romania	44.6

Source: Eurostat [ilc_hcmh01] English Housing Survey 2012/13

Comparing the size of homes to other countries is fraught with difficulties. The latest data I've sourced is from Eurostat and was collected in 2012. Unfortunately the results didn't include any data for the UK due to a response rate of only 13% to the dwelling size question. Fortunately the English Housing Survey data is for the same period and appears to be based on a broadly similar definition of dwelling size.

Based on these two data sources and assuming some consistency in measurement across all countries, it appears that the average dwelling size of 92.3 m² in England is just below the regional average of 96m² and within 10% of Austria, Spain, Germany, France, Italy, Greece, Finland and Slovakia. The size of dwellings in some countries does suggest that there is room for improvement. The Netherlands with an average size of 106.7 m² and Denmark with 115.6 m² are popular examples of having larger homes than this country. The particularly high figure for Demark reflects a much higher proportion of detached homes than in England and doesn't tell us anything about the distribution of property sizes.

Apples and Oranges

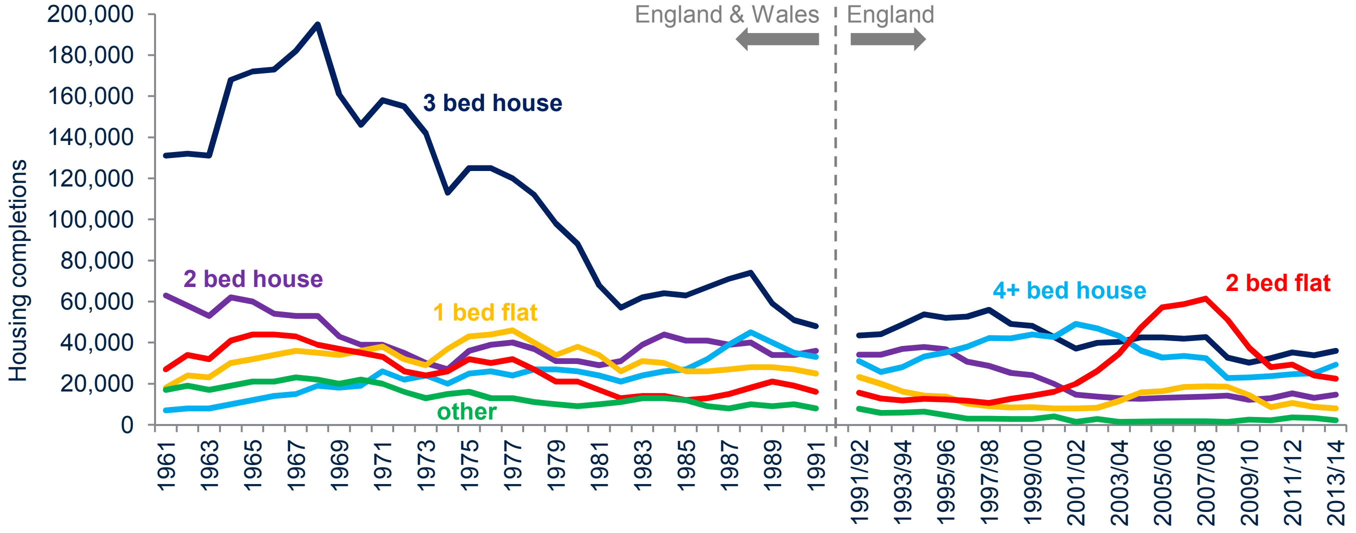
While the size of all homes in England appears be fairly average compared to the rest of Europe, how do the size of new homes compare? Unfortunately, given the difficulties in comparing new build property sizes across Europe and ensuring consistency of measurement, I'm going look at how new build compares to the existing stock instead. Recent reports that have attempted an answer have issues that primarily stem from a lack of up to date data.

For example, a report by RIBA in 2011 (The Case For Space) reported that new homes in the UK *'were the smallest in Western Europe'*, but this used findings from a 2002 EU report. That report gives an average new build size of 76m² for England and was collected in 1996.

More recently, LSE published a report (UK Housing and Planning Policies) that says *"New houses are about 40% smaller than in similarly densely populated European countries"* which references an EU report published in 2005 and gives an average new build size of 82.7m² for the period 1981-2001.

So just how accurate and relevant are these data sources for current new build homes given their date and the changing trends in the type of property being built? Figure 2 below shows how the type of property being built has changed over time. Historically, the most common property type built was a 3 bed house. The decline in the number being built followed the wider decline in housebuilding until the 2000s. Construction of 3 bed houses were then briefly overtaken by 4+ bed houses in the early 2000s and 2 bed flats during the mid to late 2000s. Since the credit crunch they have once again become the most common type of property built albeit at lower levels.

Fig 2 – Completions by Type and Number of Bedrooms



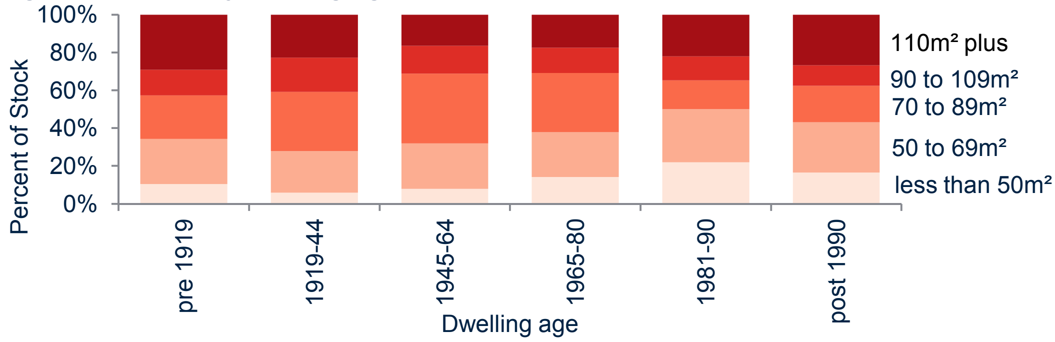
Source: DCLG Tables 209/254, CCHPR AE Holmans 2005 (Other is 1 bed houses and 3+ bed flats)

Usefully, the 2011-12 English Housing Survey provides data on dwelling sizes split by dwelling age. As probably expected, the data appears to show a decline in size over time. The average size of homes built prior to 1919 is 102 m² and falls to an average size of 83.9 m² for homes built between 1981 and 1990. Perhaps contrary to common perception, the average size for homes built after 1990 actually increases to 91 m².

The data appears to show that property sizes have fallen over time with a rebound in recent years despite a larger number of flats being built. However, it is important to understand what this data does and doesn't tell us. It doesn't tell us the average size of properties when they were built but does tell us how big they are now. Older properties have had more time for renovations and extensions. The useable floor plan for an older property may be vastly different to when it was first constructed thanks to extensions, loft conversions, conservatories, and digging out basements.

42% of dwellings built before 1944 are over 90 m² in size, 31% of those built between 1945 and 1980 are over 90 m², and 36% of those built since 1981 are over 90 m²

Fig 3 – Floor Area by Dwelling Age



Source: English Housing Survey 2011-12

Bigger Than You Might Think (but with an important caveat)

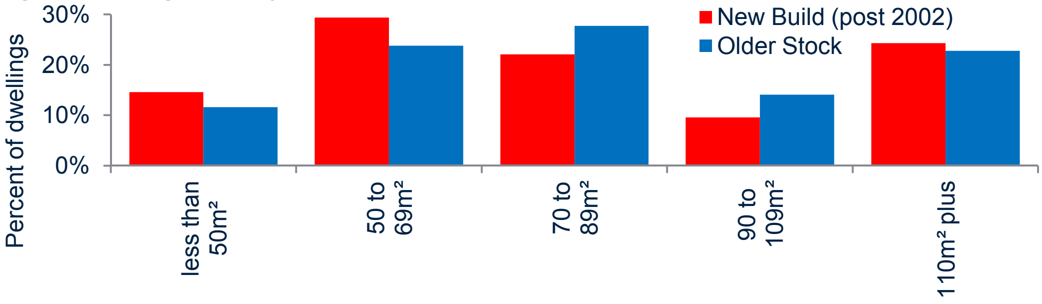
As we saw on the previous page, the average size of homes built after 1991 is actually larger than those built in previous decades. The 2012-13 English Housing Survey reinforces this trend and shows that the average floor area of homes built between 2002 and 2012 (96 m²) is actually slightly above the average for older homes (92 m²). As a secondary source, the DCLG data on Energy Performance Certificates for properties built and/or sold in 2014 also shows slightly larger new build homes (94 m²) than second hand homes (92 m²).

So the data appears to show that new build homes are on average larger than existing homes. However, as Fig 4 shows, the average hides a wide distribution with a large number of smaller new build homes (most likely flats) counterbalanced by a sizeable proportion of much larger homes. Relative to the existing stock there are far fewer homes in the middle of the distribution.

This distributional issue is far more important than how a simple average compares to other countries. It raises questions around the inequality of access to housing, over and under-occupation, generational divides and what it is we need our new build housing to actually do. As just one example, perhaps using new build to unlock existing family homes through downsizing may be more beneficial than trying to build high density family homes in some markets.

The average floor area of homes built between 2002 and 2012 was 96m², slightly above the average for older homes (92m²). However, this average hides the large proportion (66%) of new build homes sized below 90m² that is counterbalanced by the large proportion of new build homes with floor area of more than 110m².

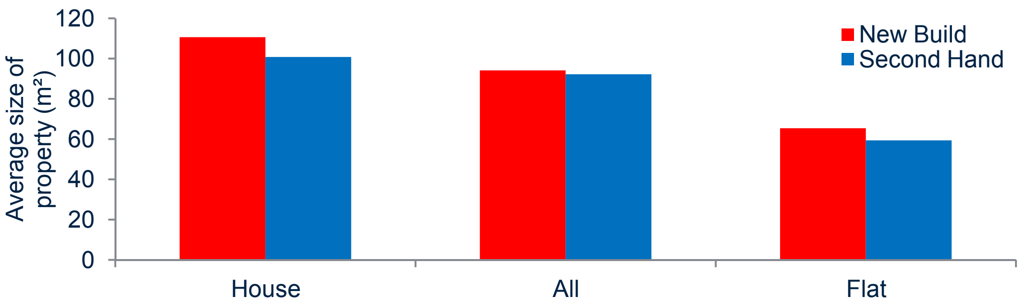
Fig 4 – Housing Stock by Floor Area



Source: English Housing Survey 2012-13

According to Energy Performance Certificates, the average new build flat in 2014 was 65.5m² compared to 59.4m² for second hand flats. New build houses were 110.6m² compared to 100.9m² for second hand houses. These figures include all tenures.

Fig 5 - Average Size of Domestic Property Built/Sold in 2014, England & Wales



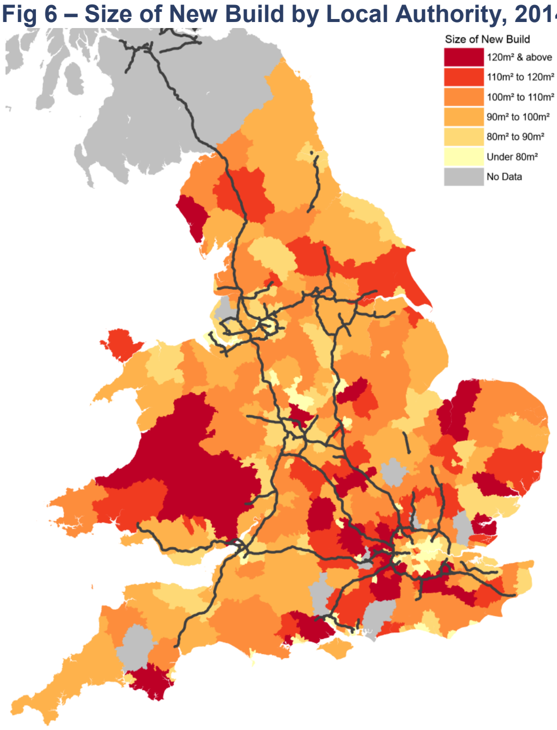
Source: DCLG NB4, D5

On the whole, the map of average new build sizes opposite just illustrates population density and underlying property types. Smaller new build homes are found in urban areas and larger new build homes in rural areas.

However, there is an interesting feature with much larger average property sizes within the greenbelt constrained Home Counties, even compared to adjoining rural areas.

This reflects the pressure London puts on surrounding housing markets and the price premium for space at the top end of the market within a commutable time from central London.

Fig 6 – Size of New Build by Local Authority, 2014



Source: DCLG NB4