



Standards in New Homes in Winchester District

An Assessment of the evidence for the introduction of accessibility and space standards to new build homes in Winchester District

The Health & Housing Partnership LLP

A Report to Winchester City Council

September 2015

1. Introduction

Context

1. New national technical standards were announced by Government as part of a package in March 2015. The Code for Sustainable Homes was withdrawn and no other local technical standards or requirements are permitted. However, the new national technical standards are optional and should only be required through Local Plan policies if they address clearly evidenced need. Their impact on viability also needs to be considered.
2. Winchester City Council have an opportunity to take forward these standards into Local Plan policy through the Local Plan Part 2 and through a review of the Affordable Housing Supplementary Planning document.

Policy and Guidance

1. Under the new approach to technical standards, which was launched as the 'housing standards review package' on 25th March 2015, local authorities have the option to set technical standards exceeding the minimum required by building regulations in respect of accessibility. There is also an optional nationally described space standard. There is no current minimum space standard for new dwellings in the private sector, although most new affordable homes need to meet HCA standards as a condition of grant funding.
2. The new optional accessibility standards are contained within Part M of Building Regulations. Part M (Access to and Use of Buildings) Approved Document 2015 Edition now describes three standards. Category 1 – known as 'visitable dwellings' – should be applied to all new dwellings and is not optional. This means that reasonable provision should be made for people to gain access to and use the dwelling and its facilities. This should include most people, including wheelchair users.
3. The first optional standard (Category 2) is known as 'accessible and adaptable' dwellings and is broadly equivalent to Lifetime Homes standards. This requires that provision is made within new dwellings to meet the needs of occupants with differing needs including some older or disabled people and allow for the adaptation of the dwelling to meet changing needs of occupants over time. This means that features are provided to enable common adaptations to be carried out in the future to increase the accessibility and functionality of the building.
4. Category 3 requires that provision must be made to allow simple adaptations of the dwelling to meet the needs of occupants who use wheelchairs eg making it easy to

install a lift; or meet the needs of occupants who use wheelchairs eg a through floor lift is installed.

5. Anything other than the base line standard (Category 1) will only be permitted where the local authority has demonstrated that they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance. Furthermore, Category 3 standards should only be applied where a local authority's allocation policies can match the home to a particular person, otherwise dwellings should be built to wheelchair adaptable level.
6. The new Nationally Described Space Standards deal with the internal space within new dwellings. The standards set out the requirements for the gross internal area (GIA) of new dwellings at defined occupancy. They also set out floor areas and dimensions for key parts of the home, notably bedrooms and storage. It is relevant to note that these standards are not adequate for Part M (4) Category 3 wheelchair housing because of the additional internal area required for circulation in these homes. Table 1 below is taken from the document and summaries the space standards according to the size of home and number of occupants. Paragraph 10 of the Nationally Described Space Standards report provides guidance on how properties should conform to this standard.

Table 1 - Minimum gross internal floor areas and storage (m²)

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

² Where a one person flat has a shower room rather than a bathroom, the floor area may be reduced from 39m² to 37m².

7. Winchester City Council's Affordable Housing Supplementary Planning Document 2008 (amended 2012) includes a requirement that all new affordable housing should be built

to Lifetime Homes standards unless there are demonstrable reasons why this cannot be achieved on a particular site. Lifetime Homes standards are broadly equivalent to the new optional Category 2 'accessible and adaptable' homes in Building Regulations. There is no current requirement in policy to provide Lifetime Homes in the market sector.

Objectives

8. Winchester City Council wish to examine whether and how to adopt new technical standards in relation to space and accessibility within new build homes. Specifically, the Council wish to examine:
 - Whether there is evidence to support the nationally described space standards being applied to new market and affordable housing.
 - Whether there is evidence to support the Council requiring developers to provide 'accessible and adaptable homes' (Category 2) and wheelchair accessible properties (Category 3).
 - It is important to distinguish between market and affordable homes since different considerations apply in the implementation of these standards.
9. The rest of this report is structured as follows:
 - Section 2 examines evidence of need.
 - Section 3 outlines current practice.
 - Section 4 presents options for policy.

2. Evidence of Needs

Accessibility

1. Planning Practice Guidance 'Housing – Optional Technical Standards' explains that in demonstrating the need to set higher accessibility, adaptability and wheelchair housing standards, local authorities should consider the following factors:
 - The likely future need for housing for older and disabled people (including wheelchair user dwellings)
 - The size, location, type and quality of new dwellings needed to meet specific evidenced needs (eg retirement homes, sheltered homes or care homes)
 - The accessibility and adaptability of the existing housing stock
 - How needs vary across different housing tenures
 - The overall impact on viability.
2. Workstream 1 examined the demand for accommodation from the growing older population. It focused on the need for specialist housing, particularly extra care accommodation. However, it is worth summarising the scale of this demographic group and the number of households who live, and are likely to continue to do so, within the mainstream housing stock. Much of the data and literature that relates to the older population provides information on the population aged 65 and over as this relates to traditional retirement patterns and changes in lifestyle associated with this. However, it is in the older age groups (75+ and 85+) where care needs tend to increase and where the greatest demand for specialist or adapted accommodated is generated.
 - There are currently 21,800 over 65s in the population of Winchester District (2011). 3,280 of which are currently over the age of 85. Older people (aged 65+) account for almost 19% of the population.
 - The population aged 65+ is projected to grow to 39,200 by 2037, with growth fastest amongst 85+ age group which will comprise of 9,800 people in 2037. In 2037, older people (65+) will account for 28% of the population.
 - Those aged 75 and over will account for 16.4% of the population in 2037 (22,600 people), an increase of 11,600 from 2012. The 75+ threshold is used by the Housing LIN SHOP toolkit to forecast demand for specialist accommodation as it is associated with increased demand for care.
 - The vast majority of older people currently live in mainstream housing. According to the Housing LIN SHOP toolkit, in 2014 just 2,800 of those aged 65+ in Winchester lived in specialist accommodation. 87% of the 65+ age group live in the mainstream housing stock.

- If this pattern continues in the future, around 34,000 over 65s will be living in mainstream housing in 2037, around 15,000 more than in 2015.
 - Government policy is to enable older people to remain in their own homes for as long as possible, by meeting care needs at home.
 - This means that the mainstream housing stock needs to enable this. In the past, this has been achieved largely through adaptations to homes eg installation of common features such as level access showers, stair lifts and handrails.
3. **The scale of the older population and projections of growth, particularly amongst those in advanced older age, and the correlation between advanced old age and disability indicates the need for a housing stock in the future which is more accessible and adaptable.**
 4. **In 2037, around one quarter to one third of the housing stock will be occupied by people aged over 65.** The vast majority of these households will want to continue to live in their own homes and will be supported in this aspiration through Government policy on care provision. It is amongst the older age groups – 75+ and 85+ that the need for accessibility and adaptations is most likely to apply.
 5. Evidence on levels of health problems and disability within the population support the need for accessible and adaptable accommodation.
 6. There are 15,470 people living with a long term health problem or disability in Winchester District, 14% of all people in the District. This figure may provide the closest indication for the current need for housing which is accessible or adaptable. Whilst the largest number, almost 10,000 people live in the owner occupied sector, the social rented sector is home to a disproportionate number of people with long term health problems or disabilities – 25% of all people living in the sector.

Figure 2: People with Long Term Health Problem or Disability, Winchester District 2011

Disability	All Tenures	Owned or shared ownership	Social rented	Private rented or living rent free
All People	111,540	77,280	15,840	18,430
People with Long Term Health Problem or Disability	15,470	9,810	4,080	1,570
<i>Day-to-day activities limited a lot</i>	<i>5,870</i>	<i>3,330</i>	<i>1,960</i>	<i>570</i>
<i>Day-to-day activities limited a little</i>	<i>9,600</i>	<i>6,480</i>	<i>2,120</i>	<i>1,000</i>

Source: Census 2011

Figure 3: People with Long Term Health Problem or Disability, by Tenure (% of People in each Tenure)

Disability	All Tenures	Owned or shared ownership	Social rented	Private rented or living rent free
People with Long Term Health Problem or Disability	14%	12%	25%	8%
<i>-Day-to-day activities limited a lot</i>	5%	4%	12%	3%
<i>-Day-to-day activities limited a little</i>	9%	8%	13%	5%

Source: Census 2011

- Amongst the older population (aged 65+) there are 8,610 people with a long term health problem or disability. This represents 42% of all people over the aged of 65. The proportion of people aged over 75 with LTHP or disability is likely to be higher. Those aged 65+ account for 56% of all people with a long term health problem or disability.
- In the social rented sector, 60% of those aged over 65 years of age have a long term health problem or disability. Whilst the social rented sector has a disproportionate number of older people with a disability, there are significant proportions of older people living with disabilities in both the owner occupied and private rented sectors.

Figure 4: Older People (Aged 65+) with Long Term Health Problem or Disability, Winchester 2011

Disability	All Tenures	Owned or shared ownership	Social rented	Private rented or living rent free
All people aged 65+	20,700	16,270	3,210	1,220
People with Long Term Health Problem or Disability	8,610	6,110	1,940	570
<i>Day-to-day activities limited a lot</i>	3,500	2,290	950	260
<i>Day-to-day activities limited a little</i>	5,110	3,820	990	310

Source: Census 2011

Figure 5: Older People (Aged 65+) with Long Term Health Problem or Disability, by Tenure (% of People in each Tenure)

Disability	All Tenures	Owned or shared ownership	Social rented	Private rented or living rent free
Older People Living in Tenure with Long Term Health Problem or Disability	42%	37%	60%	46%
<i>-Day-to-day activities limited a lot</i>	17%	14%	29%	21%
<i>-Day-to-day activities limited a little</i>	25%	23%	31%	25%

Source: Census 2011

9. Figure 6 shows that 3,530 people in Winchester are living with bad or very bad health, 3% of the population. This compares to 5% of the population nationally. These people are a subset of those with a long term health problem or disability. Not all of the larger group will describe themselves as in 'bad health' even though they have a long term health problem or disability. The smaller number of people in bad health may have more urgent demand for adaptations to their properties in order to help them manage their conditions. Although the largest number of those in bad health (1,840) live in the owner occupied sector, they make up just 2% of home owners. The social rented sector has a higher proportion of people in bad or very bad health (8% of people).

Figure 6: People in Bad or Very Bad Health, by Tenure 2011

	Owned	Social Rented	Private Rented	All tenures
Winchester	1,840	1,280	410	3,530
Winchester %	2%	8%	2%	3%
South East %	3%	10%	3%	4%
England %	4%	11%	4%	5%

Source: Census 2011

Figure 7: People Claiming Disability Living Allowance (end 2014)

Area	Total	Working Age (16-64)	% of working age population	Pension Age (65+)	% of People Aged 65+
Winchester	3,370	1,980	3%	830	3%
South East	334,780	193,000	3%	89,490	6%
England	2,631,920	1,444,320	4%	854,590	9%

Source: ONS, Department for Work and Pensions data on Nomis web)

10. Another indicator of the level of poor health or disability within the population is provided by the number of people claiming disability living allowance (Figure 7), or the new personal independence payment which replaces it. Not all people living in poor health or with disabilities will claim this, or be eligible to claim it. But it gives an indication of the level of relatively serious health problems or disability within the population. The figures broadly match the numbers who describe themselves as in bad health (Figure 6). These figures do not take account of children who may be in ill health or have a disability. In Winchester, 3,370 people claim DLA (which is being phased out for working age people) and a further 377 claim Personal Independence Payment. The number of claims equate to 3% of the working age population and 3% of the older population. These rates are lower than in the population as a whole.

11. At the national level, 2.3% of households in the owner occupied sector contain a family member that uses a wheelchair. In the social rented sector, the figure is noticeably higher at 7.1%.¹ Figures specifically for Winchester are not available.
12. It is possible to examine specific demand for accessible and adapted homes within Winchester from those on the Hampshire Home Choice waiting list and in need of affordable housing. Figure 8 shows that there are just under 200 households who need an adapted property within Winchester District. This accounts for 9% of all registered households. Half of these households are aged 65+ with the vast majority needing a 1 bedroom property. However, amongst younger households, 31% of those needing an adapted property need 2 bedrooms or more.
13. The vast majority of these households need ground floor accommodation (or flats with lifts) and around half need level access accommodation and level access showers, indicating that applicants have restricted mobility.
14. 27 of applicants need a property which is fully wheelchair accessible, around 1.4% of all applicants on the waiting list.

Figure 8: Need for Affordable Adapted Homes in Winchester, August 2015

Age group	1 Bed	2 Bed	3 Bed	4 Bed	Total
18-24	3	1	0	0	4
25-39	9	8	3	3	23
40-49	15	7	2	2	26
50-54	10	3	0	0	13
55-59	15	3	0	0	18
60-64	17	2	0	0	19
65-69	20	3	0	0	23
70-74	21	1	0	0	22
75+	44	2	0	0	46
18-64	69	24	5	5	103
65+	85	6	0	0	91
All Households	154	30	5	5	194

Source: Hampshire Home Choice

¹ CLG Guide to Available Disability Data 2015

Figure 9: Adaptations Required by Households on Waiting List

Type of Adaptation Needed	Number
Ground floor accommodation	190
Ground floor toilet	88
Level access shower	118
Other adaptations	9
Wheelchair accessible accommodation	27
Level access	104
Stair lift	9

Source: Hampshire Home Choice

15. Very few wheelchair accessible properties become available for letting – on average 5 each year over the last 3 years. Each year, there are around 5 households needing a wheelchair accessible home for every property that becomes available through re-letting. This ratio is broadly in line with those needing general needs homes compared to general needs lettings (5 households waiting per re-let). **To maintain this level of availability, taking account of the growing older population, properties either need to continue to be adapted for wheelchair use, or new homes need to be built which are wheelchair accessible in line with Category 3 of Building Regulations.**
16. **The demographic and disability data suggests that there is a case for building up a stock of accessible and adaptable homes over the long term – in line with Category 2 of Building Regulations. The size of the older population (focusing on the 75+ population in 2037) suggests that, in the longer term, around 20% of the housing stock should be capable of housing older people who are likely to have accessibility needs.**
17. However, an issue with such an objective in the market sector is that there is no guarantee that new accessible and adaptable homes would be purchased by those who need them. Indeed, older home owners are the group least likely to move home. It is more likely that new homes with these features are taken up by younger households, who do not need the features and are unwilling to pay a price which reflects their additional costs. Unless these homes are developed on any significant scale, they will take longer to filter through in any numbers to those who need them.
18. However, ensuring a significant proportion (around 20%, broadly in line with the projected size of the 75+ population in 2037) would gradually change the adaptability of the housing stock over time and may allow the development of a submarket for this form of housing.
19. An alternative and more radical option would be to require 100% of new market homes to be accessible and adaptable. New completions add around 1% to the housing stock each year so it would take decades to have a significant impact on the stock as a whole unless the majority of new homes meet the standard. However, new completions often

account for a substantial proportion of properties on the market (around 10% in any one year) and so if all new homes were accessible and adaptable, they could have a significant impact on the supply available to buyers.

20. The key barrier to delivering Category 2 homes in the market sector is the impact on build costs and therefore viability. These costs and impacts will need to be considered by a separate viability assessment. Ultimately, the Council will need to consider whether this is a policy priority, which might take precedence over the delivery of affordable homes (since most other development contributions are fixed in CIL).
21. The case for building accessible and adaptable homes, in line with Category 2, is much more clear-cut in the affordable sector for the following reasons:
 - The proportion of disabled people in the social rented sector is higher than in other tenures. This is particularly true for older people with health problems or disabilities (60% of all older people in the social rented sector in Winchester have a long term health problem or disability). Winchester City Council need to ensure that the affordable housing stock is capable of meeting their needs.
 - WCC has control over the occupancy of the affordable housing stock so can ensure, as far as possible, accessible and adapted homes are available to those with specific needs.
 - WCC has a track record in delivering lifetime homes (essentially Category 2 homes) in new affordable dwellings, in line with its Affordable Housing SPD 2008. This policy has been achieved, with some exceptions on specific sites, since 2008.
22. There is evidence of need for a small number of wheelchair accessible properties (Category 3) within the affordable housing sector, suggesting that 1-2% of all new affordable homes should meet this standard to maintain supply over time. The majority of wheelchair accessible properties in the housing stock have been developed through adaptation to existing homes. It would be worth reviewing the costs of these adaptations and comparing this to the additional cost of providing new wheelchair accessible homes to ensure that such a policy would represent good value for money.
23. In the market sector, given the relatively small need for these properties (2.3% of all home owners need them nationwide), developers are unlikely to want to build them speculatively. There is also no allocation system in place to match new wheelchair accessible properties to those who need them. Indeed owner occupiers exercise a much greater degree of choice over where they live and so new wheelchair accessible market homes becoming available on new schemes have no guaranteed market.

24. This might be addressed through a requirement on developers to make provision for wheelchair accessible homes in their new development (eg notionally set aside 1 or 2 plots which could be developed as such), but only required to build once a buyer has been secured. This should work with the model house builders use for the development of new houses (not flats) where new homes are built at the rate equivalent to sales. It could also help to ensure that the additional build costs are passed on to the buyer, rather than impacting on the developer's profits or through a negative impact on the developer's ability or willingness to support affordable housing contributions. This would also ensure that the features in the property match the individual needs of the buyer.

Space

25. Winchester City Council is interested in examining the size of dwellings, in terms of floor area, that have been delivered through new development in recent years. A concern about dwelling sizes has been evidenced in recent research reports on the size of homes in Britain compared to other countries, including a study done by Cambridge University in 2014 which analysed floorspace data for 16,000 English homes and showed that, on average, homes were smaller than in other European countries.

26. The key driver over the space provided in new homes is high land values. This is particularly true within Winchester District. In summary, the price of space is high. In response, developers tend to build and buyers purchase and occupy smaller homes. The space that any household occupies is determined by what they can afford, not the size of their household or their particular needs. However, Winchester also has a 'prime' housing market where developers bring forward proposals for very large dwellings to meet demand from the wealthiest buyers. This has resulted in the development of some very large apartments in terms of floor area in the City Centre. There is some concern within the Council that, although these are described as 2 or 3 bedroom dwellings and therefore compliant with Local Plan policy (DM2), they do not necessarily make the most efficient use of housing land or meet wider housing needs.

27. The space available in homes in the affordable housing sector is particularly important because these homes are occupied intensively. Households are allocated the minimum amount of space they require, with young children expected to share bedrooms. The space available to households in affordable housing has come under even more pressure since the introduction of the 'bedroom tax' which reduces benefit payments to working age people who are "under occupying" their homes.

28. Where homes are fully occupied it is therefore important to ensure that the space available is sufficient to meet needs.

29. Space standards have been applied to all new affordable homes built under the HCA's development programme in recent years and these standards broadly match those set

out in the Government’s new ‘nationally described space standards’. Affordable homes will now be expected to comply with the new standards if receiving HCA grant.

30. In the market sector, occupancy of homes does not relate closely to the size of the household. The Winchester SHMA (2012) and previous Central Hampshire SHMA (2008) revealed that half of single households occupied homes with 2 or more bedrooms. In the market sector, households buy and occupy homes according to their income and life stage and levels of under occupancy are high.
31. Local authorities cannot control the occupancy of market homes (with the exception of some Houses in Multiple Occupation in the private rented sector). Local authorities have very weak influence over the amount of space that households in the owner occupied sector occupy.
32. Furthermore, policies to increase the floor area of new homes in line with space standards are likely to result in higher prices for those units – partly because of higher build costs but mainly because of high land values. More space in individual homes will result in more land being used to deliver the same number of homes, or result in smaller garden sizes and less amenity space. All other things being equal, some households could be priced out of the market for new homes.
33. However, another concern over the space within new dwellings relates to the flexibility and adaptability of the housing stock over time. This is particularly true of small flats which have little prospect of being extended and so the space inside is always limited to its original floor area. In contrast, small properties built in the past (such as terraced housing originally built in the Victorian era) have been capable of extension eg into back garden, side return or loft. The size of new dwellings therefore also needs to be judged in the context in which they are developed. For example, even if the original floor area is small, is there space to extend the dwelling within its plot?

Figure 10: Internal Floor Area (GIA) of Homes for Sale in Winchester, August 2015

Number of Bedrooms	All Properties (sq m)	New Properties (sq m)	Nationally Described Standard (Range dependent on occupancy and number of storeys in dwelling)
1 bed	43.8 sq m	47.0 sq m	39-58 sq m
2 bed	79.9 sq m	73.9 sq m	61-79 sq m
3 bed	123.6 sq m	128.5 sq m	74-108 sq m
4 bed	184.6 sq m	174.9 sq m	90-130 sq m

Source: Rightmove

34. THHP has reviewed the available data on the gross internal area (GIA) of homes on the market within Winchester, using information from floorplans on Rightmove. It is important to note that these GIA measurements are often approximate, but nevertheless provide a guide as to the size of the housing stock. There were 156 properties on the market which had GIA information (out of a possible 265), including 43 new build homes. The sample includes a mix of old and new homes and of varying types and sizes. In summary:

- Overall, the vast majority of dwellings in Winchester, as represented by properties on the market for sale, meet or exceed the new nationally described space standards in terms of GIA.
- Amongst new build properties (developed in the last 10 years) there is no clear evidence that these homes are falling below the new standards on a consistent basis. There are a small number of exceptions (2 units) amongst new 2 bedroom flats in the city centre.
- There were also examples of older properties which do not meet the new space standards so the exceptions are not restricted to new build homes.
- It is relevant to note that sheltered and retirement properties for sale did not usually have GIA information on floorplans. These homes are likely to be among the smallest properties and may be least likely to meet the new space standards. However, this raises the question as to whether any exceptions should be made for specialist housing, particularly where communal areas and facilities are provided. The national standards do not refer to specialist accommodation.

35. It has not been possible to monitor the GIA internal space of new homes which are currently at application stage or have recently received planning permission, other than at Winchester Village where several properties are being marketed and these are included in Figure 10.

36. The difficulty in monitoring the internal floor area proposed in new developments presents a problem if Winchester City Council wish to apply the new space standards. In order to apply such a policy WCC would need to ensure that developers routinely provide data on GIA for each dwelling as well as the number of bedrooms in their applications and that this is recorded in a way that can be monitored and analysed.

3. Current Practice

1. This section examines how far these new standards are already being achieved in new housing development in the District. Although this report does not examine the viability of providing these housing standards, existing practice in delivering them can provide an indication of how viable they are to meet.

Affordable Housing

2. 'Accessible and adaptable' dwellings broadly in line with the optional standard Category 2 of Building Regulations have been provided in all new affordable homes since 2008, with some exceptions on specific sites.
3. Wheelchair accessible dwellings have been provided for affordable housing tenants largely through the adaptation of existing homes. There were around 80 (20 per annum) in the last 4 years, though most of these adaptations provided level access showers and stair lifts rather than wheel chair accessibility. There were 15 adaptations of properties over this period to make homes wheelchair accessible. A further 5 wheelchair accessible homes have been provided through new affordable housing development where Winchester City Council undertook the works whilst the property was being built by the contractor on behalf of the housing association.
4. HCA space standards have also been delivered on all new affordable homes since 2008 as providers have complied with grant conditions. HCA space standards are broadly in line with the new nationally described space standards and will be replaced by them in future developments.

Market Housing

5. Evidence from the new homes on the market currently suggest that space standards, in relation to the internal floor area, are broadly being met by new developments. There are some exceptions amongst smaller flats. THHP has not been able to review whether detailed requirements such as the size of the master bedroom and storage areas are in line with the new standards, although information on floorplans suggest that, on the whole, master bedrooms do meet the new minimum standards.
6. There is insufficient readily accessible information contained in planning applications to assess the GIA and other space standards against the dwellings proposed. Whilst GIA data is collected in order to calculate CIL contributions from new developments, the figures recorded relate to the development as a whole and are not broken down for individual dwellings. Data collection could be amended to capture this information in the future.

4. Options for Policy

Summary

1. New affordable housing in Winchester meets the new standards in terms of accessibility and space and should continue to do so given the needs of the population who live in this tenure and the occupancy levels in social rented homes.
2. In addition to the standards already achieved, a small number of wheelchair accessible affordable homes are required to maintain supply and meet the needs of applicants on the waiting list. THHP suggest that it would be worthwhile confirming whether it is better value for money to do adaptations to existing homes, or require new wheelchair accessible properties through the affordable housing requirement in new development.
3. There is a case for developing new 'accessible and adaptable' homes (Category 2) in the market sector on the basis of demographic change and increasing care needs, particularly amongst the older population. The vast majority of older owner occupiers will continue to remain in their homes rather than move to specialist accommodation.
4. Space standards are broadly being achieved in the market sector. It is also questionable whether WCC would want to enforce building larger dwellings with the impact this might have on the cost of new homes and affordability. Indeed, it is noted that draft policies have been developed to restrict 'over-large' 2 and 3 bedroom dwellings (Local Plan Part 2 policy DM2). All other things being equal, more land might be required to deliver WCC's Local Plan housing allocation, if dwelling sizes are increased, unless flexibility is given around open space or other requirements on specific sites.
5. WCC could also not control occupancy once these new homes were built to ensure the household has sufficient space. In practice, most owner occupiers under occupy their homes and so the protections offered by space standards are irrelevant to them.
6. The issue of flexibility and adaptability of the housing stock is important however. Small flats in particular are not capable of being extended or adapted to meet needs in future.

Accessibility

7. **In relational to affordable housing, the Council should adopt and apply Category 2 of the Building Regulations, which is broadly equivalent to 'Lifetime Homes' standard.** This is already being delivered in affordable housing in the District which would suggest that it is achievable, viable and part of established practice.

8. **THHP suggest an additional requirement for a small number of wheelchair accessible affordable properties, in line with demand on the waiting list. This implies the need for 1-2 wheelchair (Category 3) properties for every 100 affordable homes developed.**
9. **In market homes, there could be a requirement for developers to set aside 2% of homes to be developed as wheelchair accessible Category 3 properties (in line with national wheelchair usage amongst owner occupiers).** THHP suggest that these plots could be developed if buyers come forward so that developers can guarantee a sale, additional costs can be passed on to buyers and so that buyers can specify their particular requirements. This approach may work best on large sites (over 100 homes) and the MDAs where developers are building out in phases and where homes can be presold or reserved by buyers and there remains some flexibility over internal specifications.
10. WCC might wish to consider the NHS and Public Health England 'Healthy New Towns' programme, launched in August 2015, which may offer the opportunity to consider how new development can improve the health and wellbeing of communities. There may be support and/or funding to pilot the development of 100% Category 2 homes on specific sites for example.
11. **WCC should consider the viability impact of applying Category 2 'accessible and adaptable' dwellings to all market homes.** This approach would have the greatest impact on the housing stock over time, as new development adds around 1% to the housing stock each year. This would mean that, after 20 years, around 20% of the housing stock would be accessible and adaptable for most people to live in as they age. Theoretically, if the stock grew to represent 20% of all homes it would allow the majority of older people to access these properties, providing they are willing to buy and move into them. This could have significant benefits for health and social care outcomes in the long term.
12. The main constraint on applying Category 2 universally is the additional build costs incurred compared to standard building regulations and the impact this would have on the viability of development, given that Category 2 homes are unlikely to command a price premium. Ultimately, this rests on whether WCC is willing to 'trade' other policy objectives to achieve this increase in standards. As some policy objectives are fixed (eg CIL), improved standards are likely to be achieved largely at the expense of general affordable housing provision / contributions.
13. **A more modest goal might be to require around 20% of market homes to meet 'accessible and adaptable' (Category 2) dwelling requirements as part of WCC's strategy for meeting the needs of older people and allowing them to remain in their homes for as long as possible.** 20% is the estimated of the proportion of older

households (aged 75+) in the population in 20 years time. Those aged 75+ are more likely to need accessible and adaptable homes and it is the age threshold used in 'More Choice; Greater Voice' to forecast demand for specialist accommodation. This would not ensure that older people end up in these homes, but a submarket might develop over time (much like with the market for bungalows or sheltered homes) where older people recognise the advantage of these properties and are prepared to move to them and outbid other buyers.

Space Standards

14. **In relation to affordable housing, THHP suggest Winchester City Council seek that all homes comply with the new nationally described space standards.** These are broadly in line with those that have been applied by the HCA on affordable housing schemes which have received grant funding in recent years. These standards are critical in affordable housing because these homes are generally fully occupied and so space standards provide a minimum guarantee for their occupants. Though it is important to acknowledge that overcrowding in relation to occupancy criteria remains a problem within affordable housing and space standards will not solve this - it is more affordable housing that is required.
15. The case for the application of space standards in the market sector is not about occupancy and guaranteeing space to occupants but about the flexibility and adaptability of the housing stock in the long term.
16. At present, THHP would see little value in requiring space standards on market houses and larger flats. There is little evidence that new homes do not comply with the new standards or that there are problems caused by excessively small dwellings being developed (if anything, policies seek to address excessively large dwellings). There is flexibility with many of these properties to extend and adapt over time. Furthermore, if larger houses do not meet the space standard (eg 4 bedrooms) developers may just start describing them as 3 bedroom homes in their planning applications. How they are marketed by estate agents once completed is not within WCC's control as long as they meet building regulations standards.
17. **Given current evidence, there is a case for applying a minimum dwelling size for all dwellings of 39 sq m, though in practice it would only likely apply to new flats. This is the minimum size for a 1 bedroom flat in the 'nationally described space standards' guidance. The standards set out in paragraph 10 of the nationally described space standards would apply in terms of the measurement of the property.**
18. In the market sector, some 2 and 3 bedroom flats may fall below the new nationally described space standards for the overall GIA of 2 and 3 bedroom homes but it is difficult to identify this as a real problem because buyers of these new properties have a

choice over whether they buy them and how they occupy them. There are numerous larger properties available at cheaper prices in the existing stock which are substitutable. Most owner occupiers also under-occupy their homes.

19. Winchester City Council may make exceptions for some specialist forms of housing, extra care housing for example, where communal facilities are provided. It may not be desirable to apply space standards to housing with care because of the cost this would add to developments which already find it difficult to compete with mainstream developments for land.
20. **Overall, THHP suggest WCC begin to monitor the GIA of individual homes in new schemes by encouraging developers to report information on proposed dwelling mix in line with national space standards.** This could be incorporated into CIL data collection as WCC already records the total GIA for whole developments. This would allow WCC to review whether developments are meeting the new space standards, with a view to applying the standards in future if particular problems are identified.