

## **ED38 – Evidence supporting Strategic Policy 3.2 (2) – Space and Accessibility Standards**

**8 March 2021**

This document clarifies the evidence supporting Policy 3.1 (2) in Dartmoor National Park Authority's emerging Local Plan 2018 – 2036. This information was requested by the Inspector during examination hearings as part of discussion on Matter 4 Issue 4 on Wednesday 3<sup>rd</sup> March.

### **1 Nationally Described Space Standards**

1.1. Policy 3.2 (2) part 2 requires that 'all new housing development should meet and not significantly exceed nationally described space standards'.

1.2. NPPG (Reference ID: 56-020-20150327) states:

*"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

- *need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions."*

1.3. The need for residential floorspace standards in Dartmoor National Park can be summarised as follows:

- To ensure the market element of housing schemes is suitably sized to meet Dartmoor's market housing needs on the basis Dartmoor has a high workplace-based affordability ratio and its existing housing stock is significantly under-occupied.
- As a clear and robust benchmark to use when assessing the quality and affordability of proposed accommodation, including market, affordable, and rural workers housing.

1.4. Evidence for the under-occupancy of Dartmoor's housing stock is available via the census and is presented in the Strategic Housing Market Assessment. The below Table 1 shows Dartmoor's occupancy rating relative to other areas. This information is produced from the Census, based on the number of bedrooms in households and is used to provide a measure of under-occupancy and over-crowding in the housing stock.

1.5. The occupancy rate is defined as follows:

- 0: the household has the precise number of bedrooms recommended by the 'bedroom standard'.
- -1 or less: the household has at least one bedroom too few for the number and composition of people living in the household and is considered overcrowded.
- +1: indicates that a household has one bedroom more than is recommended for the number and composition of people living in the household and is considered under-occupied by the bedroom standard.
- +2 or more: indicates that a household has two or more bedrooms more than is recommended for the number and composition of people living in the household and is also considered under-occupied.

**Table 1 – Occupancy rating of Dartmoor households relative to other areas (Census 2011)**

		Occupancy Rating				
Location		+2	+1	0	-1	-2
Dartmoor	Households	8,199	5,422	2,908	252	31
	%	<b>49%</b>	<b>32%</b>	<b>17%</b>	<b>1%</b>	<b>0%</b>
South Hams	Households	16,818	12,456	6,979	543	62
	%	<b>46%</b>	<b>34%</b>	<b>19%</b>	<b>1%</b>	<b>0%</b>
Teignbridge	Households	21,355	20,104	11,544	902	98
	%	<b>40%</b>	<b>37%</b>	<b>21%</b>	<b>2%</b>	<b>0%</b>
West Devon	Households	10,550	7,497	4,312	337	29
	%	<b>46%</b>	<b>33%</b>	<b>19%</b>	<b>1%</b>	<b>0%</b>
Devon	Households	132,749	113,732	69,693	5,814	656
	%	<b>41%</b>	<b>35%</b>	<b>22%</b>	<b>2%</b>	<b>0%</b>
England	Households	7,558,815	7,594,129	5,885,951	870,540	153,933
	%	<b>34%</b>	<b>34%</b>	<b>27%</b>	<b>4%</b>	<b>1%</b>

1.6. Table 1 shows that Dartmoor's housing stock is very significantly under-occupied, with a very high proportion of households with an occupancy rating of 2. Analysis of all Local Authority areas in England shows there are only 8 other Local Authority areas, of 348 such areas, with 49% or more of households having an occupancy rating of +2. This makes Dartmoor's housing stock very significantly under-occupied.

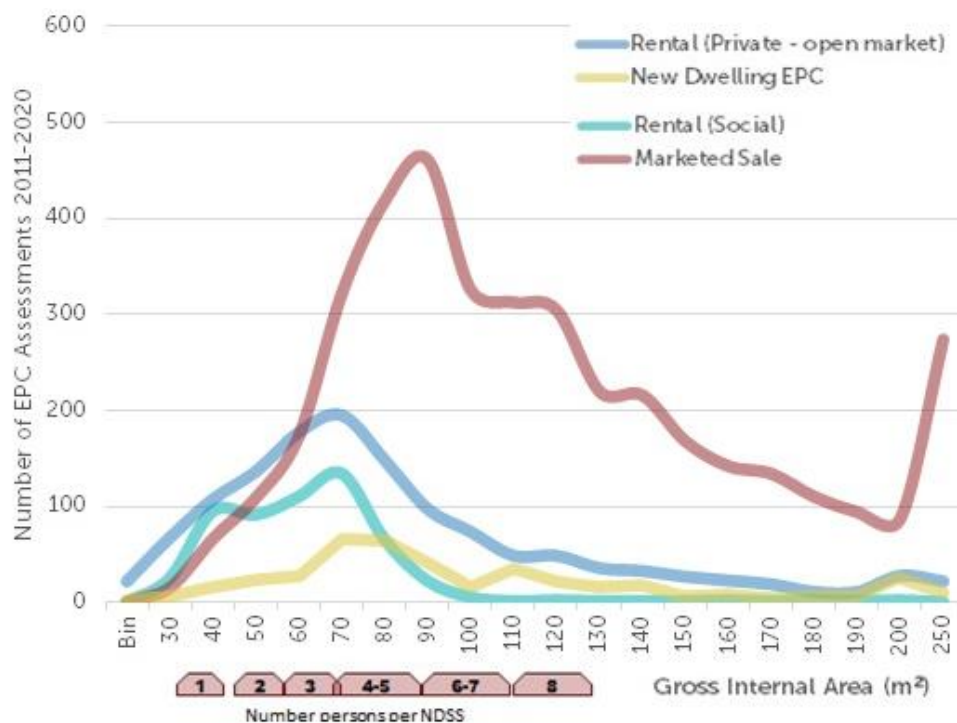
1.7. To further support this the Authority has analysed data from all the Energy Performance Certificates<sup>1</sup> (EPCs) issued for dwellings in the National Park between 1 Jan 2011 to 30 Sept 2020. EPC's are required for any sale, rental or new dwelling, and the data provides the most comprehensive source of floor area. With over 6,000 certificates for more than 5,500 unique dwellings this provides a statistically significant measure of the overall housing supply. The number of EPCs issued over the past decade for homes in the National Park is shown for each dwelling type, followed by the average gross internal area (GIA) for each type and then the closest matching nationally described space standard based on a 2 storey dwelling.

<sup>1</sup> <https://epc.opendatacommunities.org/domestic/search> data for Dartmoor postcodes extracted; estimate is that <= 2% of dwellings counted are outside park boundary but with same rural postcode.

**Table 2** – EPC certificates issued within Dartmoor National Park between 2011 and 2020 by market sector

	Marketed sale	New dwelling	Rental (private)	Rental (social)
Number of EPCs issued	4241	422	1318	561
Average Gross Internal Area (m <sup>2</sup> )	128.6	109.5	90.8	67.9
Closest space standard	5b 8p	5b 6p	3b 5p	2b 3p

1.8. Finally, the following plot shows Gross Internal Floor area of the EPC dwellings by market sector with the NDSS sizes shown below. A large portion of the open market dwellings are in excess of the expected standard for a 3 or 4 person household in accordance with nationally described standards. Around half of the potential market sales are sized for households larger than 6 people. This evidence demonstrates that new dwellings and social re-lets are within the modest parameters of the NDSS, but the stock of available market housing presents few opportunities for smaller households.



**Figure 1** - Gross Internal Floor area of the EPC dwellings by market sector with the NDSS sizes

1.9. Given the above identified need for space the below sets out how DNPA has sought to meet the requirements set out in National Planning Practice Guidance with regards implementing the standards.

1.10. **With regards need** we have analysed the gross internal floor area of 267 recently completed or soon to commence dwellings on allocated sites. We found that on average dwellings are only 2.2% larger than the nationally described space standard. Whilst some dwellings are 15% - 20% smaller or larger than the standard these dwelling types did not generally have high occurrence rates relative to those which complied with the standards. For completeness the raw data from this exercise is provided at Appendix 1.

1.11. **With regards viability** the Whole Plan Viability Assessment has tested the impact of all new dwellings being constructed to meet and not significantly exceed nationally described space standards. All units in testing met nationally described space standards and were not unduly large.

1.12. **With regards timing** in view of the fact dwellings currently being constructed do not generally significantly exceed nationally described space standards, there is no evidence to suggest that a transition period to allow developers to factor the cost of space standards in future land acquisitions is necessary. Therefore none is proposed in the Plan and through consultation developers have not indicated that one is necessary.

## 2 Accessibility standards

2.1 Policy 3.2 (2) part 2 requires that ‘all new build dwellings should be constructed in accordance with Building Regulations Requirement M4(2) for accessible and adaptable dwellings, or successive regulations’.

2.2 NPPG (Reference ID: 56-020-20150327) states:

*“Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:*

- *the likely future need for housing for older and disabled people (including wheelchair user dwellings).*
- *size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).*
- *the accessibility and adaptability of existing housing stock.*
- *how needs vary across different housing tenures.*
- *the overall impact on viability.”*

2.3 **With regards the likely future need for housing for older and disabled people.** The Strategic Housing Market Assessments for both Exeter<sup>2</sup> and Plymouth<sup>3</sup> Housing Market Areas (HMAs) project that there will be significant growth in the population aged 65 or over. The population of over 65s in the Exeter HMA is projected to increase by 44.4% between 2013 and 2033 and in Plymouth HMA by 41.3% between 2014 and 2034. The effects of these increases are predicted to be particularly acute in Dartmoor National Park which already has a higher proportion of its population over 65 than either of the wider HMAs. Table 3 summarises how Dartmoor population is anticipated to age between 2014 and 2036 using the Edge Analytics dwelling-led population projections and compares these to Devon and England baselines.

**Table 3 - Age profile indicators (Source: ONS and Edge Analytics)**

Indicator	Dartmoor National Park (2036 blended scenario)	Dartmoor National Park 2014	Devon 2014	England 2014
Percentage 65+	37%	26%	24%	18%
Percentage 80+	13%	7%	7%	5%
OAD	48	43	40	27
Median Age	-	50	46	40

OAD (old age dependency ratio) = population aged 65+ / population aged 15-64

2.4 **With regards the size, location type and quality of dwellings needed to meet specifically identified needs.** The Design and Built Environment Topic Paper cites two surveys completed by the Devon Rural Housing Partnership, on the housing aspirations of older people, one for Devon and one as part of the Chagford, Drewsteignton, Gidleigh and Throwleigh Housing Needs Assessment. Both these surveys highlight that there is a high level of need for

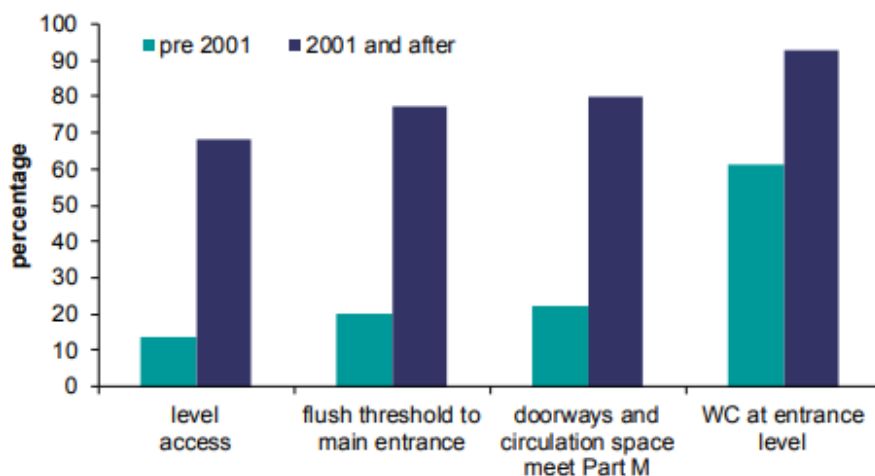
<sup>2</sup> Exeter Housing Market Area (2014) ‘Strategic Housing Market Assessment’

<sup>3</sup> Plymouth Housing Market Area (2013) ‘Strategic Housing Market Needs Assessment’

accessibility features, many homes require costly adaptation to meet these needs which may or may not be possible, and that meeting these needs is very complex as most want to remain in their existing homes. Provision of M4(2) standards can help ensure that homes are adaptable to meet accessibility needs and this can help ensure that older people are supported in continuing to live in their communities, whilst the process of down-sizing can also free up family sized housing for families.

2.5 **With regards the accessibility and adaptability of existing housing stock**, the Design and Built Environment Topic Paper provides data from the 2015 Index of Multiple Deprivation, which includes a category on indoor living environment defined by the proportion of social and private homes that do not have central heating and the proportion which do not meet the Decent Homes Standard. Although not a direct measure of accessibility the indicator provides a useful proxy for the overall standard of housing in the National Park and is an indicator of the extent to which modern accessibility standards are likely to be met.

2.6 The National Park scores particularly poorly with the indoor living environment being ranked on average in the lowest 12.6% in England and 35% of the National Park being ranked in the lowest 3% in England. The high proportion of listed and traditional buildings and much of the National Park being off the gas grid is likely to be the primary cause of this. Whilst many older homes continue to be desirable and fetch above average prices, it is unlikely they will meet the accessibility needs of an ageing population. Indeed Figure 2 shows data from the English Housing Survey which confirms that homes built prior to 2001 are much more unlikely to meet accessibility standards.



**Base: all dwellings**

**Note: underlying data are presented in Annex Table 2.1**

**Source: English Housing Survey, dwelling sample**

**Figure 2 – Proportion of homes with accessibility features that provide full visitability, 2014 (Source: English Housing Survey<sup>4</sup>)**

2.7 Interrogating census data further it is possible to better understand how the future accessibility needs of Dartmoor’s population are likely to change and what needs may arise in

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/539541/Adaptations\\_and\\_Accessibility\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/539541/Adaptations_and_Accessibility_Report.pdf)

the future. The Census information for National Parks<sup>5</sup> provides an overview of the extent to which the resident population is limited in their day to day activities. This can be used to understand strategic need for accessibility standards. 19.8% of Dartmoor’s population is limited at least a little and this is above the national average.

**Table 4 – Persons with a long-term health problem or disability that limits a person’s day-to-day activities and have lasted or is expected to last at least 12 months (Census 2011)**

Area name	All categories: Long-term health problem or disability		Day-to-day activities limited a lot		Day-to-day activities limited a little	
	Persons		Persons		Persons	
	Number		Number	%	Number	%
Dartmoor National Park	33,596		2,883	8.6%	3,777	11.2%
Lake District National Park	40,770		2,880	7.1%	4,350	10.7%
Peak District National Park	37,905		2,860	7.5%	4,033	10.6%
South Downs National Park	112,343		7,015	6.2%	10,311	9.2%
Yorkshire Dales National Park	19,761		1,234	6.2%	2,081	10.5%
England and Wales	56,075,912		4,769,712	8.5%	5,278,729	9.4%

2.8 This understanding can then be developed further by considering the extent to which those whose day-to-day activities are limited form part of the ageing population. And therefore the extent to which Dartmoor’s ageing population will likely increase demand for dwellings with improved accessibility features. Census data helps show this, Table 5 shows how disabilities are concentrated across age groups within Devon. 22.8% of the 65+ age group are limited a lot, whereas 26.4% of the group are limited a little.

**Table 5 – Disabilities by age group in Devon**

Age	All categories: Long-term health problem or disability		Day-to-day activities limited a lot		Day-to-day activities limited a little	
	Persons		Persons	%	Persons	%
Age 0 to 15	123,174		1,827	1.5%	2,820	2.3%
Age 16 to 49	297,359		10,816	3.6%	15,420	5.2%
Age 50 to 64	157,440		12,793	8.1%	18,696	11.9%
Age 65+	168,426		38,398	22.8%	44,409	26.4%
Total	1,492,798		127,668	8.6%	162,690	10.9%

2.9 With this understanding it is possible to apply these assumptions to Dartmoor’s demographic projections provided by Edge Analytics and estimate (with caution) the likely growth in the number of those with long-term health problem or disability Dartmoor will experience by 2036. Table 6 applies the same occurrence rate from Devon to the projected increase in

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<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/keystatisticsfornationalparksinenglandandwales>

Dartmoor’s 65+ age group population from the 2019 Edge Analytics forecasts shown in Table 3. This high level exercise which only analyses the growth in disabilities amongst the 65+ age group as compared to the rest of the population indicates that Dartmoor could see growth of circa 1,600 persons with day-to-day activities limited a little or a lot. This is a growth of 30% from the 6,660 falling within this category indicated in Table 4.

**Table 6 – Projected growth in disabilities amongst the 65+ age group**

	2018	2036 (65 dpa)	Estimated Growth 2018 - 2036
	Persons	Persons	Persons
<b>65+ age group</b>	8,834	12,916	+8,082
<b>Day-to-day activities limited a lot (22.8% of 65+)</b>	2,014	2,944	+930
<b>Day-to-day activities limited a little (26.4% of 65+)</b>	2,332	3,409	+1,077
<b>Other age groups (&lt;65)</b>	24,995	21,986	-3,009
<b>Day-to-day activities limited a lot (4.4% of &lt;65)</b>	1,099	967	-132
<b>Day-to-day activities limited a little (6.39% of &lt;65)</b>	1,597	1,402	-192
<b>Total</b>	<b>7,043</b>	<b>8,725</b>	<b>+1,683</b>

- 2.10 It is not feasible to then understand how this growth would translate to a need for accessible dwellings as the relationship between these persons and households is complex, not least indicated by the survey information above, furthermore the limitation of activities is varied and complex, and not necessarily requiring physical alterations to a house. Nevertheless, what is clear from survey information is that there already exists significant need for accessible dwellings. When this and likely future demand are combined it becomes clear that future delivery of accessible dwellings set out in the Dartmoor Local Plan (975 dwellings over 15 years post-adoption) is very unlikely to meet the need even when providing 100% M(4)2 dwellings. A policy position which seeks M4(2) across all new dwellings is therefore considered reasonable and justified to ensure new dwellings are best placed to meet Dartmoor’s current and future local needs.
- 2.11 **With regards how needs vary across different housing tenures**, the above trends occur across housing tenures and the Authority does not feel the need to investigate this relationship further.
- 2.12 **With regards the overall impact on viability** provision of M4(2) standards has been included in the Whole Plan Viability assessment’s assumptions and is demonstrated viable in the scenarios tested.
- 2.13 It is important to note also, that Government considers this a clear direction of travel for



national policy. In a consultation paper in September 2020<sup>6</sup> MHCLG sought views on a range of options around mandating the current M4(2) requirement in Building Regulations as a minimum standard for all new homes. The response to this consultation has not yet been published.

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<sup>6</sup> Raising accessibility standards for new homes (UK Government September 2020)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/930274/200813\\_con\\_doc\\_-\\_final\\_1\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/930274/200813_con_doc_-_final_1_.pdf)

## Appendix 1 – Analysis of gross internal floor area on recent housing development sites in Dartmoor National Park

Settlement	Site	Application reference	Status (March 2021)	Typology code	Closest bed room/spaces match in NDSS	Storeys	Units	GIFA (m2)	Equivalent NDSS space standard (m2)	Difference (m2)	% difference from NDSS standards
Ashburton	Longstone Cross	0312/19	DPP approved	1	1b2p	1	8	51	50	1	2%
				2	2b4p	2	15	82	79	3	4%
				3a	3b5p	2	8	95	93	2	2%
				3b	3b5p	2	4	98	93	5	5%
				4	4b6p	2	3	121	106	15	14%
				5	2b4p	1	1	95	70	25	36%
Ashburton	Brewery Meadow	0035/18	Under Construction	A	4b6p	2	1	110.7	106	4.7	4%
				B	4b6p	3	11	108.3	112	-3.7	-3%
				C	3b4p	2	4	93	84	9	11%
				D	2b3p	2	6	74.4	70	4.4	6%
				E	2b3p	1	1	83	61	22	36%
Chagford	Bretteville, CG Fry	0360/15	Under Construction	407A	4b8p	2	8	144	124	20	16%
				404	4b7p	2	8	131	115	16	14%
				403	4b8p	3	4	142	130	12	9%
				401	4b7p	3	2	116	121	-5	-4%
				312A-G1	4b6p	2	1	119	106	13	12%
				312A	3b6p	2	20	98	102	-4	-4%
				312	3b5p	2	1	91	93	-2	-2%
				312C1	3b6p	2	1	109	102	7	7%
				312C3	3b6p	2	3	117	102	15	15%
				312C5	3b6p	2	6	112	102	10	10%
310A	3b5p	2	2	77	93	-16	-17%				

				302	3b6p	2	3	104	102	2	2%
				303B	3b6p	2	2	112	102	10	10%
				F201	2b4p	2	2	92	79	13	16%
				F203	2b4p	2	2	85.9	79	6.9	9%
				G1	1b2p	2	6	49.49	58	-8.51	-15%
				G3	1b2p	2	6	48.69	58	-9.31	-16%
				S203	2b4p	2	7	77	79	-2	-3%
				S203A	2b4p	2	3	77	79	-2	-3%
				S305	3b5p	2	6	86	93	-7	-8%
Chagford	Bretteville, Blue Cedar Home	0524/14	Completed	1-6	2b4p	1	6	74.3	70	4.3	6%
				7-10	2b4p	2	4	135.5	79	56.5	72%
				11&15	3b6p	2	2	135.4	102	33.4	33%
				12&13	3b6p	2	2	143	102	41	40%
				14	3b6p	2	1	124.4	102	22.4	22%
Mary Tavy	Garage Sites	0853/07	Completed	1	3b5p	2	1	98.55	93	5.55	6%
				2	3b5p	2	1	98.55	93	5.55	6%
				3	2b4p	1	1	68.21	70	-1.79	-3%
				4	3b5p	2	1	84.3	93	-8.7	-9%
				5	3b5p	2	1	84.3	93	-8.7	-9%
				6	3b5p	2	1	79.78	93	-13.22	-14%
				7	3b4p	2	1	87.19	84	3.19	4%
				8	3b5p	2	1	74	93	-19	-20%
				9	3b5p	2	1	74	93	-19	-20%
				10	3b6p	2	1	91.3	102	-10.7	-10%
				11	3b5p	2	1	83.16	93	-9.84	-11%
				12	4b6p	2	1	147.08	106	41.08	39%
				13							
				14	3b4p	2	1	88.2	84	4.2	5%
				15							
				16	4b7p	2	1	117.1	115	2.1	2%

South Brent	Fairfield, Phase 2	0346/18	DPP approved	17	3b5p	2	1	98.52	93	5.52	6%
				18	3b5p	2	1	98.52	93	5.52	6%
				19	3b5p	2	1	92.62	93	-0.38	0%
				A	2b4p	2	2	63	79	-16	-20%
				B	3b5p	2	11	79	93	-14	-15%
				C	3b5p	2	3	90	93	-3	-3%
				D	3b5p	2	4	90	93	-3	-3%
				H	4b8p	2	5	137	124	13	10%
				K	4b8p	2	1	134	124	10	8%
				Flat 1	1b2p	1	6	50	50	0	0%
2B4P	2b4p	2	6	72	79	-7	-9%				
3B5P	3b5p	2	2	82	93	-11	-12%				
South Brent	Fairfield, Phase 1	0354/14	Completed	A	1b2p	1	4	51.5	50	1.5	3%
				B	2b4p	2	6	67.2	79	-11.8	-15%
				K	2b3p	1	1	58.7	61	-2.3	-4%
				C	3b5p	2	3	81.6	93	-11.4	-12%
				D	3b5p	2	2	79	93	-14	-15%
				E	3b5p	2	2	87.6	93	-5.4	-6%
				L	3b6p	2	2	95	102	-7	-7%
				F	3b5p	2	6	91.8	93	-1.2	-1%
				J	3b5p	2	1	91.8	93	-1.2	-1%
				K	4b6p	2	6	120	106	14	13%
				H	4b7p	2	5	129.4	115	14.4	13%
				M	4b7p	2	2	135.9	115	20.9	18%
								<b>Average</b>	3.46%		
								<b>Weighted average</b>	2.20%		