

BSHF submission to the Department for Communities and Local Government Housing Standards Review consultation

About BSHF

The Building and Social Housing Foundation (BSHF) is an independent housing research charity committed to ensuring that everyone has access to decent and affordable housing. It holds Special Consultative Status with the United Nations Economic and Social Council. Since 1994 BSHF has organised an annual series of consultations at St George's House, Windsor Castle, on a range of housing issues, bringing together diverse groups of experts for in-depth discussion and consideration of an important housing issue.

In addition BSHF conducts original research into areas of importance in housing policy and practice. BSHF's forthcoming report, *Perceptions of Overcrowding: Public views on space in the home*, addresses the issue of space standards and in particular the aspects of space in the home that are considered by the public to be important for an acceptable standard of living in Britain today. This research forms the basis of our submission to the Housing Standards consultation.

Introduction

A key element of decent housing is that it should be large enough for the household. However, approximately three per cent of households (750,000 households) in Britain are overcrowded¹ and the floor space in newly built housing is well below the European average.² The relationship between housing and other factors is complex but there is evidence of a link between overcrowding and physical health problems, poor educational attainment, mental health problems and strained family relationships.³

As the consultation highlights, a variety of different voluntary and mandatory space standards for new build homes exists across Britain, along with different definitions of overcrowding. However, the underlying assumptions have not typically been validated against public views. BSHF has therefore conducted research that explores public opinion on how much space in the home is needed as a minimum in Britain today.

To this end, 12 focus groups across the East Midlands were consulted. Participants were asked to agree the furniture, possessions, activities and levels of privacy that need to be accommodated in

¹ Department for Communities and Local Government (2013) English Housing Survey Headline Report 2011-12, www.gov.uk/government/uploads/system/uploads/attachment_data/file/88370/EHS_Headline_Report_2011-2012.pdf
Welsh Assembly Government (2009) Living in Wales, 2008

wales.gov.uk/docs/statistics/2009/091130livingwales2008en.pdf
The Scottish Government (2008) Overcrowding using Bedroom Standard by LA
www.scotland.gov.uk/Topics/Statistics/SHCS/LAbedroomstandard

² Dol, K. and Haffner, M. (Eds) (2010) Housing Statistics in the European Union 2010

http://abonneren.rijksoverheid.nl/media/00/66/040531/438/housing_statistics_in_the_european_union_2010.pdf

³ See, for example: Office of the Deputy Prime Minister (2004) The Impact of Overcrowding on Health and Education: A review of evidence and literature

<http://webarchive.nationalarchives.gov.uk/20120919132719/http://www.communities.gov.uk/documents/housing/pdf/138631.pdf>

the home for a minimum standard of living. These groups developed lists of requirements for case study households. Halsall Lloyd Partnership (HLP) architects and designers then produced floor plans and calculated the floor space required to accommodate the agreed lists.

There was a sense from many participants that a general lack of space was not conducive to wellbeing. Participants spoke of how too small a home could be claustrophobic, stressful or restrictive. The importance of individuals having their “own space” was mentioned in almost all groups. This was often in relation to being able to retreat or “get away” from other people in the household and their activities.

Participants were also critical of the typical space availability in new build properties, arguing that they seemed to be becoming increasingly small, with insufficient storage being a particularly common complaint. It was also noted that new-build standards should be more generous than the bare acceptable minimum, reflecting the aspiration for rising living standards. Some participants pointed out that what was considered acceptable a few decades ago is seen as insufficient today.

In light of our findings, which are detailed further in response to the questions below, BSHF would make three overarching recommendations with regard to the chapter on space in the Housing Standards consultation:

- Adequate space in the home relates to what is considered socially acceptable as well as technical specifications. What was seen as appropriate in previous generations is often unacceptable today. Therefore, as well as taking into account expert recommendations, it is important that an understanding of public perceptions of acceptable space is considered in drawing up any space standards or benchmarks.
- Any space standards or benchmarks should be aspirational, providing more than the bare acceptable minimum. In saying this, however, we of course recognise the importance of balancing these considerations against viability and affordability. Nonetheless, the importance of building a good quality fit-for-purpose housing stock with longevity should not be underestimated.
- Any system of space standards or space labelling adopted should be mandatory, ensuring that homes are of sufficient quality and enabling consumers to make a genuinely informed choice about the houses they buy.

Questions posed by the consultation (Chapter 2: Space)

13. Would you support government working with industry to promote space labelling of new homes?

Yes.

However, unlike the proposal set out in the consultation document, BSHF recommends that such space labelling be mandatory. Only then would consumers be able to make a genuinely informed choice between properties.

Furthermore, space labelling should not just be limited to new homes. Given the vast majority of house transactions are of existing properties, this would further ensure that all consumers are able

to make an informed decision among all available properties, not just new builds. As noted in the consultation document, all homes sold are required to have an Energy Performance Certificate, which contains sufficient information to provide space labelling. Therefore, such a requirement would not place an additional burden on sellers and estate agents.

14. Do you agree with this suggested simple approach to space labelling?

BSHF is in broad agreement with the approach set out in the consultation document. However, a common complaint with new build homes is the lack of storage space. BSHF would therefore propose that the amount of storage space be included in any space labelling, in addition to Gross Internal Area and room sizes.

15. If not, what alternative approach would you propose?

N/A

16. Would you support requirements for space labelling as an alternative to imposing space standards on new development?

BSHF does not have a strong opinion on which of the proposed methods should be used. However, the following points should be noted with regard to the government's objection to the imposition of space standards:

- Space standards exist in most countries in Western Europe.⁴ These standards manage to overcome issues of complexity and do not appear to have a detrimental effect on affordability or viability.
- The government currently imposes space standards on affordable housing funded through the Homes and Communities Agency, through the Housing Quality Indicators standards. The government therefore feels that this is the most appropriate mechanism for ensuring housing of a sufficient size is built for at least in some instances.

17. Would you support the introduction of a benchmark against which the space labelling of new properties is rated? Please give reasons for your answer.

Yes.

BSHF's research notes that people in Britain are not typically used to thinking of house sizes in m² and therefore these figures in isolation may not be particularly meaningful.

Equally, the inclusion of a benchmark would incentivise developers to build homes that meet or even exceed recommended standards. This would have the potential to improve space standards without the imposition of mandatory regulations. Alternatively, however, a benchmark (if set too low) could effectively become used by industry as a maximum standard, as occurred with the Parker Morris standards for council housing.

⁴ <http://legacy.london.gov.uk/mayor/planning/docs/space-standards.pdf>

It would be important to include the intended occupancy of a dwelling as part of a benchmarking process. In many cases it might be useful to include more than one benchmark on the basis of different occupancy levels.

18. Which of the following best represents your view? Please provide reasons for your views.

- a) Local authorities should not be allowed to impose space standards (linked to access standards) on new development.**
- b) Local authorities should only be allowed to require space standards (linked to access standards) for affordable housing.**
- c) Local authorities should be allowed to require space standards (linked to access standards) across all tenures.**

BSHF is in support of a national space standard for new homes (Question 19), but does not have a strong opinion on whether local authorities should be able to impose additional local space standards. However, we would make the following observations.

1. The government has strongly promoted the rights of local areas and communities to determine their own environments, particularly with regard to planning and development. To prevent local authorities from doing so with regard to space standards (option (a)) is somewhat at odds with this principle.
2. BSHF does not agree with option (b) that standards should apply only to affordable housing. Sufficient space provision in dwellings is important irrespective of tenure.
3. The problems for builders generated by a multiplicity of standards across the country are rightly highlighted within the consultation document. Therefore, if local authorities were to be allowed to make decisions locally on this issue (option (c)), they should be required to have due regard to the potential impact on viability and affordability, including an appropriate assessment of these issues. Any alternative approach adopted by a local authority should be introduced through the Local Plan to ensure it reflects both housing need and viability.

19. Do you think a space standard is necessary (when linked to access standards), and would you support in principle the development of a national space standard for use by local authorities across England?

BSHF supports the introduction of a mandatory space standard (linked to access standards) across England. As noted both in the consultation document and elsewhere in this submission, there are complexities around the introduction of mandatory space standards. However, mandatory space standards (as opposed to voluntary approaches) have the advantage of ensuring that all homes built are of a sufficient size. As with other building regulations, this ensures the quality of the dwelling stock, which is important if all households in Britain are to live in decent housing, both now and in the future.

A range of complexities exist when developing space standards. Sufficient space is sometimes more about occupancy than size. A smaller two-bedroom dwelling may be unsuitable for a family of three (even though this would not constitute overcrowding), but may be suitable for another household type requiring a two-bedroom property (e.g. a couple wanting a spare room, or two adults sharing).

Equally, space is about much more than minimum floor area. The layout of rooms and dwellings will have a big impact on the usability of the space available and feeling of spaciousness.

There are also considerations with regard to viability for developers and affordability for households, as highlighted in the consultation document. However, many of the issues with regard to viability of developments and affordability of housing are related to the functioning of the housing market (particularly in the current economic climate). Issues of viability and affordability need to be rigorously addressed through planning housing market mechanisms rather than through limiting the quality of dwellings.

Although there are important issues to resolve in developing an appropriate standard, space standards have been implemented successfully in other countries, as well as in some contexts in England (e.g. in London and for affordable housing). BSHF recommends that, in consulting on the specifics of a space standard, a wide range of actors are involved. As well as developers, architects and other specialists, it is also important to consider what is considered a socially acceptable standard of living in Britain today. BSHF's research in this area suggests, for example, that the public do not consider current overcrowding standards to be acceptable and find that new build homes lack the necessary space for storage and practical living.

20. Do you agree with the proposed limiting of the scope of any potential space standard to internal aspects only?

BSHF has no particular comment to make on this issue.

21. Do you agree that Space Standards should only be applied through tested Local Plans, in conjunction with access standards, and subject to robust viability testing?

Space standards, if introduced alongside space labelling and access standards should be introduced as part of building regulations instead of through Local Plans.

As discussed above, viability is an important consideration in the development of housing. However, if a dwelling is considered unsuitably small, then it should not be built. While standards should not be set at an unrealistic level, provision of housing of an acceptable standard is essential for the future health and wellbeing of households.

22. Do you agree with the costs and assumptions set out in the impact assessment? We are particularly interested in understanding;

- a) **Do stakeholders agree with our assumption that house builders are able to recover 70% of the additional cost associated with space in higher sales values?**
- b) **Do you agree with the extra over unit costs we have used for the current and proposed space standards? If you do not agree, could you provide evidence to support alternative figures for us to include in the final impact assessment?**
- c) **Do you agree with the proportion of homes we have estimated to have taken up space standards in the "do nothing" and "option 2" alternatives? If you do not agree, could you provide evidence to support alternative figures for us to include in the final impact assessment?**

BSHF has no particular comment to make on this issue.

23. If you do not agree with the costs set out in the impact assessment please state why this is the case, and provide evidence that supports any alternative assumptions or costs that should be used?

BSHF has no particular comment to make on this issue.

24. We also need to verify how many local authorities are currently requiring space standards, and what those space standard requirements might be. Can you identify any requirements for space standards in local planning policies? Please provide evidence or links where possible.

BSHF has no particular comment to make on this issue.

25. Can you provide any of the following, (supporting your submission with evidence wherever possible)?

- a) Evidence of the distribution of the size of current private and affordable housing development?
- b) Evidence of space standards required by local authorities stating what is required and by whom?
- c) Evidence of the likely cost impact of space standards?

BSHF has no particular comment to make on this issue.

26. What issues or material do you consider need be included in H6 of the Building Regulations, in order to address the issues identified above?

BSHF has no particular comment to make on this issue.

27. Do you agree with this approach to managing cycle storage?

BSHF has no particular comment to make on this issue.