

Homework item #17 –note to clarify the difference between analysis of internal space standards in recent permissions in Appendix 1 of the justification note on Nationally Described Space Standards [ED 57] and analysis of unit sizes of properties currently for sale in Appendix 6 of the Local Plan Site Allocations and Development Policies Viability Assessment [ED 52], particularly with reference to statement in ¶8.24 of ED 52, which indicates most units currently for sale in Cheshire East are above NDSS sizes.

Introduction

1. This note seeks to clarify the difference between the justification paper on Nationally Described Space Standards [ED 57] and the Local Plan Site Allocations and Development Policies Viability Assessment [ED 52], particularly with reference to ¶8.24.
2. As confirmed in ¶2.1 of the Nationally Described Space Standard (“NDSS”) Justification Paper [ED 57], national planning policy and guidance does not provide for a detailed methodology required to demonstrate the need for the application of NDSS. This allows for differing approaches to be undertaken.

Approach to NDSS in the Justification Paper [ED 57]

3. The NDSS Justification Paper (¶¶2.1 -2.6) sets out the methodology applied. A sample of 135 schemes granted planning permission over the period 01 April 2015 – 31 March 2019 were examined to gauge how they performed against the criteria in the NDSS.
4. Submitted floor plans were used to measure the Gross Internal Area, bedroom floorspace and width. These were then compared to the NDSS criteria. The outcomes of that assessment are clearly and transparently set out in Appendix 1: NDSS Data extract.
5. As illustrated in Appendix 1 of ED57, a judgement was made about the number of bedspaces (persons for each dwelling). For example, the scheme at Briarwood, Goostrey (page 13, [ED 57]) assumed, based on measurements obtained and the presence of double / single bedrooms, that 8 persons would reside in a five-bedroom house and the assessment, against the NDSS standards, was made on that basis.
6. The conclusion of the NDSS justification report [ED 57] recognises that the survey work may have its limitations and may not be able to perfectly represent the exact dwelling and room dimensions of all dwellings constructed in the borough, but does provide for a broad guide or illustration of the level of compliance with the standards across the borough.

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Approach to NDSS in the Local Plan Site Allocations and Development Policies ('SADPD') Viability Assessment [ED 52]

7. ¶8.24 of the Local Plan SADPD Viability Assessment [ED 52] confirms that all units included in the viability appraisal are at least as large as the requirements of the NDSS.
8. ¶8.24 also notes that an analysis of the size of units for sale in the Cheshire East area, at the time of the report, indicates that most new units being advertised for sale are above the NDSS sizes.
9. To come to this judgement, the Viability Appraisal collected information on overall house sizes taken from a number of sources including a survey of developers' websites and via property search engines including Rightmove, Zoopla and others. The number of bedrooms and the overall floor areas were taken from the advertised data on developer / property search engine websites.
10. Taking the overall house sizes and comparing them to the number of bedrooms advertised led to a judgement as to how the property performed in respect of meeting the NDSS standard. There was no information available, on the listed website sources, in relation to the actual bedspaces (opposed to bedrooms) but a proportionate judgement was made based on available information.
11. A total of 314 properties for sale were considered through the viability assessment. 248 properties for sale were in excess of the NDSS, 23 were not considered to meet the standard and in a further 43 cases, there was insufficient published information available to come to a judgement of the scheme's performance against the NDSS standards.
12. It is acknowledged that the data set has more larger units than smaller units, being a reflection of the units being advertised at the time of the survey. This could be a reason behind the difference.

Conclusion

13. This note has outlined the different approaches that the Council and its Viability consultants have undertaken in respect of space standards.
14. There are clear methodological differences between the approaches undertaken which could have led to a difference in the conclusions made. This is facilitated, in part, through no national guidance on how Councils are to determine compliance with the NDSS.
15. For the Local Plan SADPD Viability Assessment [ED 52], the viability appraisal assumes that units making up the modelled typologies included in the assessment are at least as large as the requirements of the NDSS for the purposes of the conclusions on viability.

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16. The NDSS justification report [ED 57], has separately led the Council to conclude that the NDSS are required in Cheshire East, through Policy HOU 6, on the basis of the broad illustration of performance against the NDSS and the level of performance against the standard. This is set out in ¶¶6.1-6.4 of the NDSS report [ED 57].