

Further statement from Tom Smith (representor 390)

The following comments relate, as previously to Section 5.3, item 143 of the Core Strategy Development Plan Document Publication Draft (Local Plan for the Bradford District).

May I start by applauding the Council's decision to introduce space standards in the Bradford District. Too many new build homes are built to substandard sizes, which impact on people's basic lifestyle needs; such as how and where people eat food, how people socialise with guests and members of their family, and how much privacy people have for studying or relaxing.

Unfortunately, the figures that the council have adopted are fundamentally flawed.

Item 7.8C of the Inspector's Schedule of Matters, Issues & Questions asks the following of the Council:

*"Are the size thresholds too high or too low?"*

The size of any given home should be largely determined by three key criteria - the number of bedrooms, the number of occupants and the number of storeys. It is the last of these key criteria that the Council has failed to account for, resulting in a set of figures that are generous if applied to single storey dwellings, but woefully inadequate for dwellings of two or more storeys.

Adding a storey to a house typically increases the circulation space by around 10m<sup>2</sup>, so a two-storey home will have around 10m<sup>2</sup> less useable space than a one-storey home of the same size. To put this into context, 10m<sup>2</sup> is approximately Space for a dining table, seats and circulation space for 6 people.

It is this failure to account for the space requirement differential between single and multi-storey dwellings that makes Section 5.3.143 of the core strategy unsound.

The following are the space standards that Bradford Council are looking to adopt:

1 Bed, 2 Person = 51m<sup>2</sup>

2 Bed, 3 Person = 66m<sup>2</sup>

2 Bed, 4 Person = 77m<sup>2</sup>

3 Bed, 5 Person = 93m<sup>2</sup>

4 Bed, 6 Person = 106m<sup>2</sup>

It is clear that these standards do not differentiate between dwellings built over one, two or three storeys. A one-storey, three-bedroom house would have the same minimum standards as a three-storey, three-bedroom house, which given the additional circulation space required for a three-storey dwelling (approx 20m<sup>2</sup>) is

ludicrous and completely counterproductive to the idea of space standards. 20m<sup>2</sup> is the equivalent of an adequate sized double bedroom and single bedroom combined!

If these figures are adopted, the result will be a continuation of substandard two- and three-storey homes coupled with either very generous flatted developments or flatted developments where each time an applicant files for planning permission, having to prove that these standards are too onerous and affect the financial viability of the scheme.

My recommendation is to instead adopt the following space standards. These are standards taken from the London Plan that are backed by a comprehensive study and publication (The London Housing Design Guide), which sets out minimum dimensions for each type of room to ensure that they provide adequate space for furniture, storage and circulation.

### Flats

1 Bed, 2 Person = 50m<sup>2</sup>

2 Bed, 3 Person = 61m<sup>2</sup>

2 Bed, 4 Person = 70m<sup>2</sup>

3 Bed 4 Person = 74m<sup>2</sup>

3 Bed, 5 Person = 86m<sup>2</sup>

3 Bed, 6 Person = 95m<sup>2</sup>

4 Bed, 5 Person = 90m<sup>2</sup>

4 bed, 6 Person = 99m<sup>2</sup>

### Two Storey Houses

2 Bed, 4 Person = 83m<sup>2</sup>

3 Bed 4 Person = 87m<sup>2</sup>

3 Bed, 5 Person = 96m<sup>2</sup>

4 Bed, 5 Person = 100m<sup>2</sup>

4 bed, 6 Person = 107m<sup>2</sup>

### Three Storey Houses

3 Bed, 5 Person = 102m<sup>2</sup>

4 Bed, 5 Person = 106m<sup>2</sup>

4 bed, 6 Person = 113m<sup>2</sup>

These standards give a clear distinction between the space standards required for homes built over 1, 3 and 3 storeys.

My original comments said much the same as above, which the council responded with the following:

*“The standards set out in the supporting text to Policy HO9 are considered an appropriate basis for assessing if homes provide minimum sufficient space. The standards chosen were developed and reviewed in 2007 by English Partnerships to ensure they were challenging but also viable and adjusted to the market.”*

The English Partnership Standards that the council refer to were rejected by the Mayor of London in their 2010 Housing Design Standards Evidence Summary (July 2010) for the Draft London as substandard as they didn't account for multi storey dwellings:

*4.6.8 – “The proposed London space standards compare well to others in regard to flats, though are higher for dwellings over more than one storey. This is down to the additional circulation space for stairways and corridors required in homes of two storeys or more, which have been incorporated into the London standards.”*

The Council also stated that these standards bear comparison with the London Plan:

*The standards are also broadly equivalent to the standards set out in the London Plan, which RIBA consider the best benchmark available for assessing if a home is large enough.*

The English Partnership standards cannot possibly be described as broadly equivalent to the London Plan. The Royal Institute of British Architects is quite clear on this, The RIBA publication 'The Case for Space- the size of new homes in England, states that:

*‘The London space standards are the best standards available at present in that they offer a much needed improvement on the size of homes currently being built in England.’*

*“The RIBA supports the London space standards. Although we would not consider them to be best practice, we believe homes that meet or exceed these minimums to be adequately sized to function as homes; in short, they are fit for living in. There is no reason that homes falling below these levels should be built because they would not be fit for the activities people need to carry out within their homes.”*

So the RIBA are clear that they view the London Space Standards as an absolute minimum and anything below these thresholds should not be built.

The Council also rightly notes that nationwide housing standards are in the pipeline, however, these will be entirely at the discretion of each Council as to whether these are adopted or not. In any case the standards that council propose are unworkable, even on an interim basis.

To conclude, Section 5.3, item 143 of the Core Strategy Development Plan Document Publication Draft is unsound and Council must act and replace these arbitrary figures with robust standards that take into account the realities of building suitably sized housing in different configurations.