

# REGENERATION COMMUNITY AND CULTURE OVERVIEW AND SCRUTINY COMMITTEE

4 OCTOBER 2011

## INTERIM MEDWAY HOUSING DESIGN STANDARDS- PLANNING GUIDANCE

Report from: Robin Cooper, Director of Regeneration, Community and Culture

Author: Martin McKay, Design and Conservation Manager.

### Summary

The proposed Interim Medway Housing Design Standards would provide planning guidance to developers, landowners and their advisors on the layout and space standards that will be expected in the design of new housing and in the conversion of existing properties. Compliance will be a consideration in the granting of planning permission and will apply to all planning applications for dwellings.

The interim standards have been the subject of an extensive consultation process last year and earlier this year. This paper reports on the results of the consultation and proposes a way forward.

### 1. Budget and Policy Framework

- 1.1 The proposed Interim Medway Housing Design Standards planning guidance (the Standards) is within the council's policy and budget framework. It expands upon and provides further details to the saved Local Plan policies BNE1: General Principles for Built Development and BNE2: Amenity Protection.
- 1.2 The proposed interim guidance will assist in achieving the Council core priority of '*everyone benefiting from the area's regeneration.*' It will assist in achieving the Council's ambition for '*a safe and high quality environment*' as laid out in the Medway Sustainable Community Strategy.

### 2. Background

- 2.1 Housing development is a major part of the regeneration of Medway. The next few years will see the continuing development of Rochester Riverside, Gillingham Pier, and Chatham Centre, along with the new settlement at Lodge Hill, Chattenden. At a smaller scale many existing properties are being converted to residential use. However, the Planning Committee has on many occasions expressed concerns over the small size of dwellings and hence the general amenities available to residents.

- 2.2 It is important to ensure that all new development:
- provides a standard of accommodation that enables occupants to comfortably undertake their day-to-day living activities;
  - is flexible and generous enough to allow adaptation to meet future demands and to cater for changing lifestyles;
- 2.3 The proposed Interim Medway Housing Design Standards planning guidance addresses these issues by providing technical *requirements* that will be a consideration in the granting of planning permission. At their core is a set of target space standards that lay down minimum sizes for rooms around the home.
- 2.4 The interim standards have been selected to align with the London Housing Design Guide. This is a set of standards supported by robust evidence based on anthropomorphic data that is simple to apply and which will be familiar to many developers in Medway. Ashford Borough Council is also adopting a set of space standards based on the London Guide. Gravesham Borough Council is considering whether to bring in such standards.
- 2.5 Copies of the Interim Medway Housing Design Standards have been circulated separately to Overview and Scrutiny Members, Group Rooms and will be available at the Council's main receptions and on the Council's website via <http://democracy.medway.gov.uk/mgCommitteeDetails.aspx?ID=115> .

Further copies will also be available from the Cabinet Office. Please contact 01634 332509/332008 for further details.

### **3.0 Consultation**

- 3.1 The draft interim standards were issued for public consultation from 1 November to 10 December 2010. They were sent via e-mail to approximately 350 consultees comprising developers, designers and their agents and other major stakeholders involved in the planning and delivery of housing development in Medway. 17 responses to the consultation were received, including a joint letter from several major house builders. Although small in number, the responses represent a range of stakeholders:
- 4 are large house builders active in the Medway area
  - 3 are large landowner/developers including Land Securities at Lodge Hill.
  - 4 respondents are involved in the delivery of affordable housing or housing for the elderly.
  - The remainder comprise planning and design consultancies and the Kent Fire and Rescue Service.
- 3.2 The interim standards were also discussed at the Medway Major Developers forum on 21 June 2011. Developers at this meeting expressed their views about the document.

3.3 The issues raised by respondents to the consultation fall into three main categories:

- a) *Principle* - The large developers, Affordable Housing Providers Forum and MHS Homes Group stated that the introduction of standards would increase construction costs and affect the viability of schemes at a time of gradual housing market recovery. The standards were also felt to be more generous than is necessary to allow adequate living conditions.
- b) *Implementation* – developers wanted a ‘lead in time’ for the introduction of the Medway Standards. They were concerned about sites that had already received outline planning permission for a set number of dwellings. Questions regarding the changing regulatory climate at the national level (changes to the Building Regulations and the introduction of a new National Planning Policy Framework) were also raised.
- c) *Detail* - all respondents provided varying amounts of detailed feedback on the content of the draft document. This contributed to a constructive process of refinement of the standards.

#### 4. Advice and analysis

*Principle:*

4.1 In response to developers’ concerns officers have:

- a) undertaken a dwelling size survey of recent planning applications to assess the extent to which the proposed space standards exceed that typically delivered in housing development in Medway in recent years.
- b) considered the option of adopting a ‘lower’ set of ‘minimum’ standards.

4.2 The key findings of the Dwelling Size Survey were as follows:

- On average 1-bedroom/2-person flats were 5% smaller (by floor area) than required by the Standards, and 2-bedroom/4-person flats were 2% smaller. 2-bedroom/3-person flats exceeded the Medway standards by 4%.
- 62% of 1-bedroom/2-person flats, 36% of 2-bedroom/3-person flats and 57% of 2-bedroom/4-person flats in recent developments would have failed to comply with the minimum standard. The vast majority were within 10% of the Medway Standards, but the smallest flats (a small proportion) fell well short.
- The majority of smaller house types (2-bedroom/4-person) in recent developments do not comply with the minimum standard. Many had floor areas that fell short by more than 10%. A more detailed examination revealed that stairs were cramped and narrow, there were no spaces for pushchairs, storage was very limited, and second bedrooms were small.
- On almost all schemes some dwelling types met the proposed Medway Standards and others did not.
- The majority of larger house types met the Standards.

4.3 The interim standards will generally result in larger dwellings in general. The required increase in size for flats and for larger houses is relatively small. There will be greater implications for smaller house types. There may be some cost implications for schemes that are predicated mainly on this type of housing.

- 4.4 The proposed Medway interim standards follow those set out in the recently adopted London Plan. These are based on ergonomic studies and include a requirement to meet Lifetime Homes Standards and building regulations. The recent publication of the Panel Report on the Examination in Public (EiP) of the draft replacement London Plan considered in detail the question of whether the proposed standards were overgenerous. It concluded:

*“There was relatively little debate on the figures for gross internal floor areas suggested by the Mayor... Broad consensus is perhaps unsurprising given that the figures specified... effectively derive from a simple exercise in ergonomics. That... was based on assessing the space required to accommodate a basic inventory of furniture together with adequate access, circulation and amenity space, with Lifetime Homes<sup>1</sup> also being taken into account”.*

- 4.5 In conclusion, the interim standards are robust and do not set an over generous standard.

#### *Implementation*

- 4.6 Developers pointed out that the designs of proposals that presently have outline permission are based on assumptions with regard to housing sizes and therefore housing numbers. The introduction of the Standards could have financial implications at the detailed application stage that were not budgeted for when sites were purchased by developers.
- 4.7 It is recognised that there will need to be some flexibility in applying the interim standards to sites with outline permission, and in these depressed times, to other sites. The Medway Housing Design Standards have been altered to give developers the flexibility to demonstrate that their proposed house types are of an adequate size by the alternative methodology of plotting a required inventory of furniture on planning drawings. In this way the specific shortcomings of submitted designs can be identified and reported to planning committee alongside other planning factors. In addition, and as an interim measure, the furniture inventory (as laid by the Standards) for dwellings that presently have outline permission will be slightly less than that for new developments coming forward for the first time.
- 4.8 Developers suggest that the interim standards should be guidance rather than policy until Local Development Framework Core Strategy policies 2 & 15 have been subject to independent examination and adopted (late 2012).
- 4.9 The Government is committed to reducing the overall regulatory burden on the house-building industry by March 2015 and has indicated that this may result in space standards being set nationally through Building Regulations, but this is not certain. Overall there is some uncertainty about the future of space standards applied via the planning system.

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<sup>1</sup> The Lifetime Homes standard is a set of 16 design criteria that provide a model for building accessible and adaptable homes that fit the needs of a range of users. They are not based on space standards although their application has implications for the space needed within dwellings. The Medway Development Contributions Guide requires that at least 50% of all affordable homes should be constructed to the Lifetime Homes Standard. Emerging policy proposes their general application in the future (draft Medway Core Strategy).

- 4.10 In order to address developers' concerns and the changing national regulatory climate, it is now proposed to introduce the Standards in two phases. First as interim guidance and later reviewed and formally adopted as a Supplementary Planning Document (SPD) after the adoption with the Core Strategy. This would:
- Enable a gradual transition for major developments already underway;
  - Allow for a period of testing and monitoring of the application of the Standards before formal adoption as an SPD.
  - Allow for a review that could be timed to coincide with developing government thinking with regard to space standards.
- 4.11 Interim Guidance that has Cabinet endorsement and has been subject to an extensive consultation process would have some weight (i.e. it would be robust enough to ensure that the size of dwellings and other standards are a legitimate planning issue that has to be considered as part of any planning application for residential development in Medway). The Standards are based on well-researched data and are therefore robust in themselves. There is therefore no reason why there should not be reasonable compliance with most provisions within the document.

*Detail*

- 4.12 A number of minor corrections, additions and amendments to the draft will be undertaken in response to the detailed issues and topics raised by the consultation. In particular, further flexibility is to be built in with a range of 'base line' standards (that should normally be adhered to) and 'good practice' standards (that will be encouraged). This is in line with the latest iteration of the London Housing Design Guide.

**5. Risk management**

<b>Risk</b>	<b>Description</b>	<b>Action to avoid or mitigate risk</b>
Cost and delivery impact 1 – viability.	Impact on viability of development due to reduced site capacity and increased construction costs to developers.  <b>This risk is rated B-2.</b>	Experience suggests that developers adapt to new standards and manage to mitigate initial viability impacts over time. In the meantime the standards are to be introduced as guidance, with a considerable degree of flexibility built in.
Cost and delivery impact 2 – stifling innovation.	Criticism from developers and other stakeholders that standards lead to a 'tick-box' approach that stifles the innovation required to make constrained, difficult sites viable.  <b>This risk is rated C-2.</b>	In some circumstances flexibility in application of the standards may be justified. Such cases will be determined at the discretion of Planning Committee with reference to officer recommendations.

Non Compliance with the standards	In order to go some way to answering developer's concerns with regard to providing a 'lead-in' time to adjust to the standards, the standards will not be adopted as supplementary planning guidance. They could carry less legal weight as a result.  <b>This risk is rated C-2</b>	Irrespective of whether the standards are adopted as SPG they firmly put the size of rooms and other standards on the planning agenda as issues that all developers will have to consider. There is now some built-in flexibility in meeting the standards whilst still ensuring that development provides adequate amenity and living space.
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## 6. Financial and legal implications

- 6.1 Adoption of Interim Medway Housing Design Standards will assist the Council in applying a consistent methodology in assessing housing design and so should help in defending appeals against the refusal of planning permission. However, as planning guidance only, the standards will not carry the same legal weight as they would had they been adopted as a supplementary planning document (SPD).
- 6.2 The interim standards may well be challenged by developers. If this is the case, there may be some costs associated with defending the Standards at appeal.
- 6.3 There are no financial implications.

## 7. Recommendation

- 7.1 That the Overview and Scrutiny Committee considers the consultation responses and proposed alterations to the proposed interim standards and forwards any comments it wishes to make to the Cabinet.

### Lead officer contact

Martin McKay, Design and Conservation Manager  
 Telephone: 01634 331721 E-mail: [martin.mckay@medway.gov.uk](mailto:martin.mckay@medway.gov.uk).

### Background papers

- London Housing Design Guide - Interim Edition - Mayor of London, September 2010
- Draft London Housing Design Guide: Cost and Delivery Impact Assessment, Pre Publication Draft
- Housing Design Standards Evidence Summary July 2010 Mayor of London
- The London Plan, Mayor of London, July 2007.
- Medway Local Plan Adopted May 2003
- Medway Council's Guide to producing Supplementary Planning Documents
- Medway Council Developer Contributions Guide.
- Medway Housing Design Guide- Impact Assessment

# **Medway Housing Design Standards (interim)**

**September 2011**





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# Background

## What are the Interim Medway Housing Design Standards?

The Medway Housing Design Standards (the Standards) provide planning guidance that expands upon and provides further details to the saved Medway Local Plan policies S2: *maintaining and improving environmental quality and design standards*; BNE1: *General Principles for Built Development*, BNE2: *Amenity Protection* and H6: *Flat Conversions*.

This document provides developers, landowners and their advisors with guidance on the main principles and minimum layout and space standards that will be expected in design of new housing and in the conversion of existing properties.

The standards will apply to all proposals involving new dwellings of all tenures. They do not apply to specialist housing such as student accommodation, sheltered housing for the elderly, and housing for wheelchair users. Separate specific design guidance exists for those specialised categories of accommodation.

## Status of the standards:

The Council recognises that there will have to be a degree of flexibility in applying the Standards to sites with outline permission and that it will take developers some time to gear up to the standards. It also recognises that the standards are controversial with developers. In addition the standards are designed to be compatible with Lifetimes Homes standards. These are not yet mandatory for all housing within Medway, but will become so upon the adoption of the Medway Local development Framework.

It is therefore proposed to introduce the Standards in a two-phases- first as interim guidance and later formally adopted in parallel with the Core Strategy. This would:

- Enable a gradual transition for major developments already underway.
- Allow for a period of testing and monitoring of the application of the standards before formal adoption.
- Allow for a period of familiarisation for developers and their agents.

Alongside other planning matters, The Interim Standards will be a material consideration in the determination of all planning applications that include dwellings. The Council will keep the Standards under review before finally adopting them as a supplementary planning document (SPD) following the completion of the draft Local Development Framework in late 2012.

## Why do we need Standards?

Medway will experience major housing development including regeneration projects such as Rochester Riverside, Gillingham Waterfront, Chatham Centre and the new settlement at Lodge Hill, Chattenden. At a smaller scale many existing properties are being converted to residential use. However, it is undoubtedly the case that some planning applications have featured dwellings that are too small to adequately meet the needs of their occupiers. Designs have also been deficient in a number of other practical respects. It is important to ensure that all new development:

- provides a standard of accommodation that enables occupants to comfortably undertake their day-to-day living activities;
- is flexible and generous enough to allow adaptation to meet future demands and cater for changing lifestyles;

The Standards set minimum requirements relating to a number of aspects of housing layout and design. They are divided into two sections – the first section focuses on the design and management of the spaces around buildings and the second is concerned with the quality of life within the home.

## How are the Standards derived?

The Interim Medway Housing Design Standards have been selected to be in conformity with the minimum gross internal area (GIA), room sizes and dimensions set out in with the London Plan (July 2011) and Interim Edition of the London Housing Design Guide (September 2010). This is a set of standards supported by rigorous testing and a robust evidence base based on anthropomorphic data. It is simple to apply and will be familiar to many developers and their advisors operating in Medway.

The Standards represent reasonable universal minima that ensure that homes allow all residents to comfortably undertake their day-to-day living activities. The Standards are fully compliant with circulation and layouts required by Building Regulations and Lifetime Homes standards<sup>1</sup> and fall in the mid range of those currently laid down in the Homes and Community Agency in its Housing Quality Indicators standards (v4 April 2008).

## Flexibility

In common with the Interim Edition of the London Housing Design Guide, the Medway Housing Design Standards has two categories of standards- Baseline and Good Practice:

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<sup>1</sup> Lifetime homes standards ensure that dwellings are able to accommodate that needs of range of residents. They are criteria rather than space standard based. Nevertheless compliance will have implications for the amount of space provided in each dwelling. They will become mandatory in Medway upon adoption of the Local Development framework in late 2012.

**‘Baseline’ standards:** set the baseline that new homes should meet. The extent to which proposed developments depart from this baseline will be taken into account in taking planning decisions – proposals that depart significantly from the Standards (in terms of failure to meet with a number of these standards, or the extent of failure to meet particular ones) are unlikely to be acceptable.

**‘Good practice’ standards:** are put forward as representing best practice. Departure from individual standards in this category may not justify refusal of planning permission. However, failure to meet a number of good practice standards will lead to a more thorough consideration of the acceptability of the proposals.

## Compliance

In general, the applicant should assume that a proposed development that fails to comply with the baseline standards, or that conspicuously fails to provide enough space for adequate furniture layouts (see paragraph on alternative methodologies), will be deemed unacceptable. However, in the circumstances set out below the Council considers that a case can be made for a lack of compliance.

### *Buildings of historic merit*

Existing buildings have fixed room sizes that may well be below the required room sizes laid out in this document. Compliance with the Standards when converting or refurbishing existing buildings may therefore be difficult. In cases where the quality of the existing building stock justifies its retention, and compliance with the standards may harm the historic character of the building, there may be a case for a greater degree of flexibility in the application of the Standards.

### *Outline planning permission*

The Council recognises that, in purchasing and seeking outline planning permission for sites, developers will have made assumptions about the numbers of dwellings each site can accommodate. It is therefore prepared to make some exceptions for sites that have received outline planning permission before November 2010 (the start of the consultation period for this planning guidance). It should be noted, however, that this exception will not justify schemes where every dwelling type is well below the Standards, or where the room sizes are very obviously small and inadequate<sup>2</sup>.

### *Other reasons*

There may be other reasons why a proposal should not comply with the Standards. If these are to be considered by the Council, the developers must provide full reasoning and justification why particular parts of the Standards can, or should not be, complied with. Such considerations can only be dealt with on a case-by-case basis.

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<sup>2</sup> For sites with outline permission (November 2010) and which will come forward as detailed planning applications, the acceptability of designs that fail the Standards will best be demonstrated than by plotting furniture layouts on plans. In the interim guidance, the Council will be prepared to accept rooms which can not accommodate minor items of furniture (storage, coffee and computer tables, dressing tables in second bedrooms) and circulation space and wc's that do not meet Lifetimes Homes Standards.

## **Alternative methodologies**

Although this interim guidance is based on the solid anthropological data of other studies, it will be acceptable for developers use alternative methodologies to demonstrate that their developments never-the-less provide adequate space for the day-to-day activities within each dwelling. This will best be done by plotting furniture layouts on plans. Appendix 3 at the rear of this document provides a schedule of the furniture that the Council would expect each room to accommodate, along with adequate circulation space.

It is expected that this alternative methodology may result in room sizes and flats sizes that are similar to the slightly lesser minimum standards laid down in the Homes and Community Agency in its Housing Quality Indicators standards (v4 April 2008)- particularly if Lifetime Homes standards are set to one side.

## **Working with the Standards**

The minimum standards for acceptable living conditions are set out in the summary table that follows on page 9 of this document. A more detailed explanation of each of the standards is provided within sections 1 and 2 of the document. Design teams should refer to the summary table on an ongoing basis to assess their own work against the standards.

Drawings submitted as part of a planning application should clearly demonstrate compliance with the mandatory minimum standards and also indicate which of the baseline standards are being met. Applicants must provide dwelling plans not smaller than 1:100 scale with metric room dimensions. The following information for each dwelling or dwelling type is also required:

- the maximum potential occupancy in terms of number of bed spaces
- the Gross Internal Area (see Appendix 1)
- the area of dedicated built-in storage space.
- the area and dimensions of private outdoor space
- the ceiling height of every room.
- the combined area of the kitchen, dining space and living space
- the area of each bedroom
- if the alternative methodology of furniture schedules is used, then furniture should be plotted on each plan

In the case of outline applications that do not include the detail required to assess full compliance with the standards, the onus is on the applicant and their design team to ensure that compliance can be achieved in subsequent reserved matters applications. This can be done by the submission of a selection of illustrative dwelling plans, by an indication of the proposed GIA's of dwellings, or by sketch plans that outline the overall flat or dwelling footprints on a larger scale plan of the development.

## Summary Table of The Medway Housing Design Standards

1.0	From Street to Front Door	Baseline	Good practice
1.1	<b>Outdoor Amenity Space &amp; Parking Provision</b>		
	The saved Local Plan policy L4 (Medway Local Plan adopted 2003) sets out the requirements for the provision for open space within new development.	✓	
	Minimum width of open space to be 10.5m		✓
	The Council's requirements for the quantity of parking provision are available from the Environment section of the Medway Council website ( <a href="http://www.medway.gov.uk/environment/parking.htm">http://www.medway.gov.uk/environment/parking.htm</a> ).	✓	
	Parking should accord with Secured by Design and should meet Building for Life Criteria 8,11,12,and 16		✓
1.2	<b>Shared Access and Circulation</b>		
	All main entrances should be visible from the public realm and be clearly identified.	✓	
	Entrances should be illuminated and covered.	✓	
	A single circulation core should serve no more than 8 dwellings per floor per circulation core, or 25 flats per circulation core.		✓
	An access control system with audio visual verification will be required where more than 8 flats per circulation core per floor are served, or more than 25 flats per circulation core.	✓	
	Lifts should be provided in all apartment buildings where dwellings are entered at or above the fourth floor (fifth storey).	✓	
	Access corridors and entrance lobbies should have a minimum width of 1200mm. Where corridors are double loaded or wheelchair accommodation is provided, the minimum width should be 1500mm.	✓	
	Double loaded corridors should be well lit and their design should provide windows that allow views to spaces outside the building.	✓	
	A minimum internal core size of 1100 x 1400 (8 person) is required. This should be a minimum of 1300 x 1400mm above the 6th floor.	✓	
	Two lifts should be provided for flats on or above the seventh floor.	✓	
1.3	<b>Cycle Storage, Refuse and Recycling</b>		
	In apartment buildings cycle storage should be located in a convenient storeroom or secure common space close to the street.	✓	
	Requirements for waste and recycling are available in the guidance document, 'Waste and recycling requirements for new residential developments in Medway': <a href="http://www.medway.gov.uk/environment/waste.htm">http://www.medway.gov.uk/environment/waste.htm</a>	✓	
1.4	<b>Management</b> (for developments of over 10 dwellings and with communal parts)		
	There must be a management plan that specifies who will manage the development and how	✓	
	The plan should provide a means of communicating with the lease holders and freeholders	✓	
	The management plan should include a maintenance plan specifying method of response to failure, frequency and scope of cyclical works and how works will be funded.	✓	

<b>2.0</b>	<b>Dwelling Space Standards</b>																																					
<b>2.1</b>	<b>Internal Floor Area</b>																																					
	The following GIFA must be met as a minimum in new developments:																																					
	<table border="1"> <thead> <tr> <th>Dwelling Type</th> <th>Dwelling Size (bedrooms/persons)</th> <th>GIFA (m<sup>2</sup>)</th> </tr> </thead> <tbody> <tr> <td rowspan="5">Flat</td> <td>1b2p</td> <td>50</td> </tr> <tr> <td>2b3p</td> <td>61</td> </tr> <tr> <td>2b4p</td> <td>70</td> </tr> <tr> <td>3b4p</td> <td>74</td> </tr> <tr> <td>3b5p</td> <td>86</td> </tr> <tr> <td rowspan="5">2 storey house</td> <td>2b3p</td> <td>77</td> </tr> <tr> <td>2b4p</td> <td>83</td> </tr> <tr> <td>3b4p</td> <td>87</td> </tr> <tr> <td>3b5p</td> <td>96</td> </tr> <tr> <td>4b5p</td> <td>100</td> </tr> <tr> <td></td> <td>4b6p</td> <td>107</td> </tr> <tr> <td rowspan="3">3 storey house</td> <td>3b5p</td> <td>102</td> </tr> <tr> <td>4b5p</td> <td>106</td> </tr> <tr> <td>4b6p</td> <td>113</td> </tr> </tbody> </table>	Dwelling Type	Dwelling Size (bedrooms/persons)	GIFA (m <sup>2</sup> )	Flat	1b2p	50	2b3p	61	2b4p	70	3b4p	74	3b5p	86	2 storey house	2b3p	77	2b4p	83	3b4p	87	3b5p	96	4b5p	100		4b6p	107	3 storey house	3b5p	102	4b5p	106	4b6p	113	✓	
Dwelling Type	Dwelling Size (bedrooms/persons)	GIFA (m <sup>2</sup> )																																				
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	4b6p	113																																				
	Plans should demonstrate compliance with furniture, access and activity space requirements relating to declared level of occupancy.	✓																																				
<b>2.2</b>	<b>Living/Dining/Kitchen</b>																																					
	Aggregate floor areas for living/kitchen/dining areas in new development:																																					
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2	23																																					
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4	27																																					
5	29																																					
6	31																																					
	With the exception of the kitchen area, the minimum width of a living area should be 3.2m at the narrowest point.	✓																																				
	Two separate rooms, each with an external window, should generally be provided in homes with 3 or more bedrooms.		✓																																			
<b>2.3</b>	<b>Bedroom</b>																																					
	The minimum area of a single bedroom should be 8m <sup>2</sup> .		✓																																			
	The minimum area of a double or twin bedroom should be 12m <sup>2</sup> .		✓																																			
	The minimum width of a single bedroom should be 2m.	✓																																				
	The minimum width of a double or twin bedroom should be 2.75m.	✓																																				



2.4	<b>Circulation, Storage and Utility</b>		
	A storage cupboard with a minimum floor area of 1.5m <sup>2</sup> . should be provided for 2 person dwellings (in addition to that provided in bedrooms). For each additional occupant a minimum of 0.5m <sup>2</sup> storage space should be provided.	✓	
2.5	<b>Visual Privacy &amp; Private Open Space</b>		
	A minimum distance of 20m is required between the rear facades of homes in new development and between new and existing dwellings <u>or</u> use of BRE methodology for ensuring good daylight, or be in line with the existing street frontages.	✓	
	Ground floor habitable rooms should be separated from adjacent public or communal space by a 1.2m buffer strip or have a floor level raised a minimum of 1m above the level of the adjacent external space.	✓	
	A minimum of 5m <sup>2</sup> of private outdoor space should be provided for 1-2 person flat and an extra 1m <sup>2</sup> should be provided for each additional occupant. The minimum width of balconies should be 1.5m	✓	
	Private gardens with a minimum length of 7m will be acceptable only on constrained sites where it is demonstrated that adequate visual privacy to every home is achieved. Private gardens with a minimum length of 10m will otherwise be expected.	✓	
2.6	<b>Floor to Ceiling Heights</b>		
	A minimum floor to ceiling height of 2.4m is required in all habitable rooms (finished floor level to finished ceiling level). 2.6m is encouraged.		✓
	In conversions of existing buildings to residential use, a minimum floor to ceiling height of 2.3m is required across at least 60% of the floor area of habitable rooms.	✓	
	A minimum floor to ceiling height of 3.0m is encouraged at the ground floor of apartment blocks.		✓
2.7	<b>Environmental comfort</b>		
	An area of glazing equivalent to 20% of internal floor area is required for all habitable rooms.	✓	
	Direct sunlight should enter at least one habitable room for part of the day. The living, dining and kitchen spaces should preferably receive direct sunlight.		✓
	Single aspect dwellings will not be permitted where they are in areas of high noise or pollution, or have three or more bedrooms.	✓	
	Single aspect north facing dwellings are discouraged. They should form no more than a small proportion of the overall number of dwellings (target 25% max)		✓

## **1. From Street to Front Door**

The design and management of the spaces around buildings are vital to creating successful housing development. They play a key role in creating distinctive and welcoming new neighbourhoods that work for both residents and visitors.

Streets, open spaces and parking provision must be carefully considered together as part of an integrated design strategy. Building for Life is the national standard for well-designed homes and neighbourhoods and the Council will place particular emphasis on the use of these criteria to assess the quality of the external environment created by new housing development.

The means of access to the home at the interface of the building and street affects the experience and sense of safety and security of all users. Entrances and shared circulation areas influence management strategies and the social dynamics of an apartment block. The provision for cycle storage and the collection of refuse and recycling are also key factors in the perceived quality of the street environment.

## 1.1 Outdoor Amenity Space & Parking Provision

### *Outdoor amenity space*

Communal outdoor amenity space provides space for informal play and social interaction, helping to foster a sense of community. The 'saved' Medway Local Plan Policy L4 sets out the requirements for the provision for open space within new development. It relates the required area of open space provision to the projected population of a development. It is not the purpose of this document to repeat existing policy, but to provide further guidance on the design of open space that will be used by planning officers in assessing the merits of proposals.

Communal open space is best designed for a specific use if it is to result in a pleasurable and popular place rather than the space left over once the buildings have been planned. It should be a carefully considered part of the overall design concept such that it contributes to the development's attractiveness and sense of place.

Fewer, larger areas of open space are preferred to more numerous, smaller spaces for their visual amenity value and impact in providing a focal point to a development. Open space can be provided in a variety of ways – urban square, village green, or riverside walk. Landscaped decks over under-croft car parking can provide communal outdoor amenity areas for apartment buildings.

Open space requires to be of a minimum width if it is to be fully functional for a variety of recreational purposes. 10.5 m is suggested as a reasonable minimum width. On larger sites this width should be greater in order to provide an attractive space at the heart of each development.

### **Baseline standards**

- Open space should be provided in accordance with Local Plan Policy L4 –

Where there is a proven deficiency:

- minimum 2.4 hectares per 1000 population for formal and informal recreation and play (residential development of 100 people or more),
- minimum 0.7 hectares per 1000 population for play and casual recreation (between 50 and 100 residents)
- Further detail in policy L4.

### **Good practice standards**

- Open space should be a minimum of 10.5 m in width on small sites and commensurately wider on larger sites.

## *Car parking*

Car parking should be provided so as not to negatively affect the use and appearance of open spaces, whilst also being safe, secure and conveniently located. The Council's requirements for the quantity of parking provision are available from the Environment section of the Medway Council website

Surface parking can have a major impact on the appearance of a development. A large number of existing documents provide guidance on the design of car parking provision<sup>3</sup>. The Council will make reference to such guidance along with Secure by Design principles, and the Building for Life criteria 8, 11, 12 & 16 in assessing the quality of the provision of parking and open space provision in new residential development.

### **Baseline standards**

- Parking should be in accordance with the Council's standards. (<http://www.medway.gov.uk/environment/parking.htm>)

### **Good practice standards**

- Parking accord with secured by design principles and should be designed to meet Building for Life criteria 8, 11, 12 and 16.

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<sup>3</sup> Llewelyn Davies (2000) *The Urban Design Compendium*. London: English Partnerships and The Housing Corporation.  
English Partnerships and Design for Homes (2006) *Car Parking: What Works Where*. London: English Partnerships.  
DTLR and CABE (2001) *Better Places to Live: By Design. A Companion Guide to PPG3*. London: Thomas Telford Ltd.  
DfT and CLG (2007) *Manual for Streets*.  
Kent County Council (2005) *Kent Design Guide*

## 1.2 Shared Access and Circulation

### *Entrance and access*

The entrance to a building, whether it serves an individual house or block of flats, should feel welcoming and safe. Entrances should be well lit and overlooked, visible from public spaces and easy to find.

Access corridors, common halls and entrance lobbies should have a minimum width of 1.2m to allow enough room for people to manoeuvre with shopping and buggies, and for wheelchair users to move with ease. A width of 1.2 m is therefore regarded as a minimum. 1.5 m is highly recommended. In larger developments entrance lobbies may be used for post, cycle storage and buggies.

A width of 1.5m required where corridors serve wheelchair accommodation or where flats are arranged on both sides of an internal access corridor. Such 'double loaded corridors' are generally discouraged but where used they should be well lit and their design should provide windows or openings that for natural light and ventilation and for persons within the building to orientate themselves with respect to the external environment.

### *Shared access and circulation*

Forms of shared access and circulation vary by housing type and all can result in successful developments with good design and management. Research has shown that the security of common entrance lobbies, lifts, stairs and corridors cannot be guaranteed above 20 to 25 dwellings served per circulation core and 100 residents in total- particularly where the cores give access to affordable dwellings for rent or to rented dwellings in general. It is recommended here that the number of dwellings per floor sharing a circulation core should be restricted to no more than eight<sup>4</sup>. Additional security measures will be needed for access cores that serve more than eight flats per circulation core per floor, or more than twenty-five flats in total.

### *Lifts*

Lifts make a range of daily tasks more manageable for everyone living in flats and are particularly important for older people and families with young children. They are essential for wheelchair users. The provision of lifts in flatted development is therefore an essential part of ensuring that such development schemes is suitable for a large range of residents, and ensuring that the blocks remain capable of meeting the needs of residents into the future.

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<sup>4</sup> Living at Superdensity (Design for Homes, 2007) states that grouping between four and eight flats per floor around a single core makes good use of lifts and allows at least some homes to be dual aspect.

In line with the London Housing Design Guide, it is considered that it is unacceptable for people to have to walk up more than three flights of stairs on a daily basis, and more than six flights even on an occasional basis.

As a minimum therefore, at least one lift per core should be provided in all blocks of flats where dwellings are entered on or above the fourth floor (5<sup>th</sup> storey) measured from the main entrance level. Lift provision at the third floor (fourth storey) is highly desirable. To provide cover in the event of a breakdown, at least two lifts per floor are required for any dwellings on or above the sixth floor (seventh storey), as measured from the entrance floor.

All lifts should conform the Lifetime Homes criterion 6 which requires minimum internal car size of 1100mm x 1400mm (referred to as an 8-person lift) which is large enough to accommodate a wheelchair user and a companion. Lifts designed for ten or more people (1300mm x 1400mm and larger) facilitate the movement of bulky furniture, bicycles, stretchers and coffins. They are desirable in general and particularly important for dwellings on or above the sixth floor.

### Baseline standards

- All main entrances should be visible from the public realm and be clearly identified.
- Access corridors, common halls, and entrance lobbies should have a minimum width of 1.2m. 1.5m is highly recommended, and required where corridors are double loaded or serve wheelchair accommodation.
- Double loaded corridors should be well-lit and should feature natural light and ventilation.
- An access control system with audio visual verification will be required where any of the following apply:
  - more than 8 flats served per circulation core per floor
  - more than 25 flats per circulation core.
- Lifts should be provided in all apartment buildings where dwellings are entered at or above the fourth floor (fifth storey). Two lifts per floor are required for all dwellings on or above the seventh floor.
- A minimum internal lift size of 1100 x 1400 (8 person) is required. Larger lifts of at least 1300 x 1400mm are highly desirable and essential for dwellings that are entered on or above the sixth floor (i.e. buildings of seven storeys or more).

### Good practice standards

- Entrances should be illuminated and covered.
- No more than:
  - 8 flats served per circulation core per floor
  - 25 flats per circulation core
- Lifts for all flats on or above third floor (4<sup>th</sup> storey).

## 1.3 Cycle Storage, Refuse and Recycling

### *Cycle Storage*

Medway's Cycle parking requirements are set at a minimum of one space per dwelling. All new housing developments should offer secure, convenient, sheltered cycle parking to encourage people to use their bicycles. In apartment buildings cycle storage should be located in a convenient storeroom or secure common space close to the street.

Cycle storage for houses may be provided within the home but must be in addition to the minimum storage and circulation requirements that contribute to the minimum Gross Internal Area of the dwelling (see sections 2.1 and 2.3). The location of cycle storage spaces should be indicated on planning submission drawings.

### *Refuse and Recycling Storage*

Requirements for waste and recycling are available under the Environment section of the Medway Council website in the guidance document, '*Waste and recycling requirements for new residential developments in Medway*' (<http://www.medway.gov.uk/environment/waste.htm>).

This covers a full range of considerations including detailed guidance on the location and quantity of space required for external domestic refuse and recycling storage. It recognises that the way in which waste and recycling is stored, separated and collected may change in the coming years and advises that designers should consider:

- anticipated volume of refuse;
- convenience to residents;
- access for refuse collectors and vehicles;
- fire risk;
- health and hygiene;
- appearance.

Further questions should be directed to the Waste Minimisation team via Customer First on 01634 333333.

### **Baseline standards**

- In apartment buildings cycle storage should be located in a convenient storeroom or secure common space close to the street.
- Cycle storage provided within the home but must be in addition to the minimum storage and circulation requirements that contribute to the minimum Gross Internal Area of the dwelling (see sections 2.1 and 2.3).
- The location of cycle storage spaces should be indicated on planning submission drawings.

## 1.4 Management

Housing developments with a significant element of communal space are particularly reliant on high quality management for their enduring success. This is particularly the case with flatted developments.

The Council will apply planning conditions to planning permissions for major schemes<sup>5</sup> to require the submission and agreement of a Management Plan prior to the occupancy of the scheme.

The plan must be detailed in order to be effective. It should provide details on:

- cleaning and maintenance of common parts (including roofs and external walls and windows),
- collection of service charges and enforcement of conditions of leases.
- provision for residents to have an ongoing say as it evolves in response to changing circumstances.

### Baseline standards

- There must be a Management Plan which specifies who will manage the development and how.
- The plan should provide a means of communicating with all tenants and include an obligation to consult them on management matters.
- There should be a Maintenance Plan setting out objectives and standards, the method of response to reports of failure, and the frequency and scope of cyclical works including cleaning and maintenance.
- The Maintenance Plan should specify how replacement and maintenance works will be funded and the charge that the freeholder or landlord will make to procure and manage them.

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<sup>5</sup> 10 dwellings or more with common parts (land or building elements)



## 2. Dwelling Space Standards

This section focuses on the quality of life within the home. In addition to setting out requirements for minimum internal and external private space Standards it covers the relationship between floor-to-ceiling heights, daylight and sunlight and cross-ventilation.

### *Occupancy*

The Standards assume full occupancy of each dwelling. For instance the living space and kitchen of a two-bed/ four-person house should have adequate space for four people. Similarly second bedrooms should be fully functional. The Council recognises that dwellings may be under-occupied (for example a two-bedroom/ four-person house may be occupied by only two or three people). However, it is essential that each dwelling type has adequate space to meet the needs of all potential occupants and owners into the future.

### *Baseline and Good Practice standards:*

The Gross Internal Floor Area's (GIA's) required by this document for each dwelling type is a 'baseline' standard- i.e. a standard that should normally be met.

The standards for individual rooms are fully compatible with minimum GIA's. However they are recommended as 'good practice' rather than 'baseline'. This offers the designer some flexibility with regard to the internal design of dwellings whilst ensuring the required dwelling functionality overall.

If rooms of smaller dimensions than the set minima are proposed, clearly illustrated and dimensioned plans must be provided to demonstrate all of the furniture, access and activity space requirements for the intended number of occupants.

### *Relationship between space standards and mix of dwellings:*

In accordance with PPS3, the draft National Planning Policy Framework, and the draft LDF, any large development should provide a mix of dwellings across the full range of house types to ensure balanced provision and a good match to need and demand.

The Council will therefore expect to see a range of sizes and occupancies within each dwelling type within a scheme. For example – a development of apartments would be expected to feature 1-bedroom/2-person 50sq.m. flats, 2-bedroom/3-person 61sq.m. flats, and 2-bedroom/4-person 70sq.m. flats, as well as possible 3-bedroom flats. In relation to this standard, it will not be acceptable for a development to have solely 2-bedroom/3-person flats as a specific means of avoiding the construction of larger 2-bedroom/four-person 70sq.m flats.

## 2.1 Internal Floor Area

Minimum gross internal area (GIA) relates space requirements to the maximum 'potential' occupancy of a home as defined by the number of bed spaces that it is designed to accommodate, rather than to a number of bedrooms. Minimum GIA reflects not only the number of bed spaces in relation to bedroom size but also the space to sit, eat and talk together and the space to store possessions equivalent to the number of occupants implied by the number of bed spaces. It is also influenced by the number of storeys in a dwelling as this has an impact on the amount of circulation space required.

The standards set out here encompass minimum internal space standards for the full range of typical dwelling types relevant to the Medway context.

The following GIA's must be met as a minimum in new developments:

<b>Dwelling Size</b> (bedrooms/persons)	<b>Essential GIA<sup>6</sup></b> (sq.m)
<b>Flats</b>	
1b2p <sup>7</sup>	50
2b3p	61
2b4p	70
3b4p	74
3b5p	86
<b>2 storey houses</b>	
2b3p	77
2b4p	83
3b4p	87
3b5p	96
4b5p	100
4b6p	107
<b>3 storey houses</b>	
3b5p	102
4b5p	106
4b6p	113

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<sup>6</sup> The required Gross Internal Floor areas (GIA's) do not include utility rooms, studies or en-suites. These are encouraged but require additional floor area above minimum GIA to avoid compromising the space and functionality of other parts of the home. The GIA's do however assume an additional separate w.c. for large dwellings. Full details of the definition of GIA are contained in Appendix 1.

<sup>7</sup> The principal bedroom of any home will normally be expected to be of sufficient size to form a double bedroom. Single bed-space dwellings (studio flats) of less than 50sqm are not encouraged. However, in specific circumstances single bed space dwellings with a minimum area of 39sqm may be allowed:

- in central areas where they will form a very small proportion of the housing mix.
- where developers can demonstrate that they meet an identified housing need such as in student housing or some forms of sheltered housing. In these cases the developer must be able to guarantee future nomination rights for the specific type of housing need.

## 2.2 Living/Dining/Kitchen

The minimum floor areas for living room, kitchen and dining areas are combined here as a set of aggregate living areas for different occupancy levels. These should allow the designer some freedom in how these spaces are organized.

Open-plan designs often disguise a lack of space and an entirely open-plan layout is likely to be less satisfactory than one that achieves a degree of separation between kitchen and living space. In larger family homes, two separate rooms should generally be provided.

Flexibility in the way that space can be used is also a key consideration. This is determined by space and room layout, and also by the number of rooms in a home. Homes where the living areas and circulation spaces are entirely open-plan will not necessarily create the greatest degree of flexibility when the home is in use.

### Baseline standards

- With the exception of the kitchen area, the minimum width of a living area should be 3.2m at the narrowest point.

### Recommended standards

Aggregate floor areas for living/kitchen/dining areas in new development:

Floor area for living/dining/kitchen (persons)	(m <sup>2</sup> )
2	23
3	25
4	27
5	29
6	31

- Two separate rooms, each with an external window, should generally be provided in homes with 3 or more bedrooms.

## 2.3 Bedroom

Each single bedroom should provide one adequate bed space. A minimum floor area of 8sq.m. is highly recommended. Double and twin bedrooms have the same recommended minimum floor area of 12sq.m. to encourage room designs flexible enough to accommodate adults or children.

Children and young people need space in a bedroom for study, play and spending time alone. The minimum space standards are set to accommodate this. The minimum widths allow sufficient space for a wheelchair user to pass by a bed placed against a sidewall.

Bedroom floor areas in new development:

- The minimum area of a single bedroom should be 8sq.m.
- The minimum area of a double or twin bedroom should be 12sq.m.
- The minimum width of a single bedroom should be 2m.
- The minimum width of a double or twin bedroom should be 2.75m.

## 2.4 Circulation, Storage and Utility

An efficiently planned home should have a minimum of space solely used for circulation, whilst also being designed for ease of access for all potential residents and visitors. All dwellings should aim to allow space near the entrance to off-load outdoor items without the need to pass through habitable rooms. Straight stair runs with generous landings are encouraged to allow for ease of moving furniture.

Layouts must make provision for waste and recycling bins, washing machines and drying clothes. In larger flats and houses, a separate utility room for washing and drying clothes may be more desirable.

In addition to wardrobes, storage for large items such as ironing boards, sports gear, and for ordinary possessions is important. Dwellings should have a minimum floor area of 1.5 sq.m. for 2 person dwellings and an additional 0.5 sq.m. of storage space for each additional occupant<sup>8</sup>. It may be located in any room or circulation area except for bedrooms and should be provided in addition to the space required by the furniture schedule for the living, kitchen and dining areas of the home. The storage cupboard must be free of services and appliances and have a minimum internal height of 2m.

### Baseline standards

- 1.5 sq.m. storage for 2 person dwellings.
- Additional 0.5 sq.m. storage space for each additional occupant.
- Provision for waste and recycling bins, washing machines and drying clothes.

### Good practice standards

- Space to off-load outdoor items.
- Straight stair runs with generous landings.

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<sup>8</sup> This requirement has increased that set out in the draft Medway Housing Design Standards to ensure conformity with the Space Standards Study set out in the consultation draft replacement London Plan (October 2009) and Interim Edition of the London Housing Design Guide.

## 2.5 Visual Privacy & Private Open Space

Residents of all types of housing value the provision of private or semi-private outdoor space highly. It is also necessary to ensure a certain amount of privacy from the outside for the interiors of dwellings.

### *Visual separation and privacy*

Planning guidance for visual separation has traditionally specified a minimum distance of approximately 20m between the private rear facades of homes of more than one storey. In new developments, back-to-back gardens of 10m each in length will therefore meet this requirement. This will also allow for a small extension of the ground floor layout of the dwelling to adapt to the future needs of its occupants.

There is a case for accepting less privacy in on sites suitable for high-density development, especially those that are suitable for flats where it is reasonable to assume that privacy is less important to residents. However, there is still a need to ensure that development is not overly imposing or intimidating, either for its own occupants or for those who inhabit neighbouring properties. A crucial part of this is ensuring that, in all circumstances, good daylight is available to all habitable rooms. The BRE good practice guide '*Site layout planning for daylight and sunlight*' provides a methodology for measuring this.<sup>9</sup>

Many sites are constrained by narrow existing streetscape. In these instances it is reasonable for infill development to follow street frontages rather than being set back. An exception will therefore be allowed for infill development that is no higher than the general height of existing buildings.

In the case of:

- Site suitable for higher density development;
- sites which are suitable for flats where it is reasonable to expect less; visual privacy than would be appropriate for family dwellings; and
- the fronts of all dwellings of where they face onto a street;

a distance of less than 20m between the facades of homes will be acceptable provided:

- buildings are two storeys or less; or
- adequate daylight to every home is achieved- as measured by the methodology laid down in the BRE guide '*Site layout planning for Daylight and Sunlight*;
- the design demonstrates that some visual privacy can be achieved.

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<sup>9</sup> The basic rule laid down in this document is that '*no obstruction* (building or part of building) *measured in a vertical section perpendicular to the main face, subtends an angle of more than 25% to the horizontal*'. There are more complex rules for partial obstructions and for internal corners of courtyard buildings.

Design features which help to ensure privacy include:

- the avoidance of directly facing windows and balconies in tight spaces
- angled or side glazed bay windows
- semi obscure glazing for the lower parts of windows and/or balcony glazing
- fixed and/or movable screens
- the placing of non habitable rooms on public facades.

In addition to this there is a need to ensure psychological and visual privacy for dwellings at ground floor level that are immediately adjacent to a street or a communal space such as a parking court. For this reason, it is strongly recommended that ground floor habitable rooms in all types of housing should be separated from adjacent public or communal space by a 1.2m buffer strip or have a floor level raised a minimum of 1m above the level of the adjacent external space. Other methods of separation may be possible.

Further guidance on the design and layout considerations of relevance to achieving adequate privacy for the occupants of new dwellings is provided in section 2.2.6 of the Kent Design Guide.

#### **Baseline standards: visual privacy**

- visual separation between buildings:
  - A minimum distance of 20m is required between the rear facades of homes in new development and between new and existing dwellings; or
  - Use of Building Research Establishment methodology for ensuring good daylight (including the front of buildings where they are three storeys or more); or
  - Infill development will be allowed to follow the established street line provided that it is no higher than the general height of surrounding buildings

#### **Good practice standards: visual privacy**

- Ground floor habitable rooms should be separated from adjacent public or communal space by a 1.2m buffer strip or have a floor level raised a minimum of 1m above the level of the adjacent external space.

#### *Gardens and balconies for amenity, play and recreation.*

Houses should be provided with a private garden for play and recreation that is not overlooked from the street or other public place. Gardens with a minimum length of 10m deep (see above paragraph) across the width of the dwelling will provide a reasonable space for play and recreation. An allowance of 3m for future 'permitted development' extensions would still leave a modest garden length of 7m.

In locations where space is constrained this 7m standard will be acceptable for new planning applications but not encouraged.

All flats should ideally have access to a terrace or balcony. The space requirement for balconies has been established by considering the minimum area to provide for clothes drying, a meal around a small table, and for a family and visitors to sit outside.

Balconies should preferably be located next to a dining or living space and receive direct sunlight. They should be designed to provide some shelter and as great a degree of privacy as possible from neighbours. This could be achieved by using screens or by setting the balcony back within the façade.

In certain circumstances it may not be practical or desirable to provide balconies. These exceptional cases will be assessed on a case-by-case basis but examples may include:

- Where the amenity value of the balcony would be compromised by noise and fumes from traffic;
- Smaller, infill sites where the provision of balconies may raise issues of privacy and overlooking of neighbouring properties without and within the development (particularly the internal corners of courtyard development); and
- In areas where infill development should respect the prevailing character of an existing streetscape and the provision of balconies would adversely affect this character.

In many situations it may be possible to mitigate obstacles to the provision of private balconies through careful design. Balconies should be provided on rear and side elevations in cases where they may be deemed unsuitable on a front elevation.

Where it is not suitable to provide balconies or terraces these amenity needs could be met with an internal 'winter garden' space of the same size provided that it is adjacent to full height windows and is provided in addition to the minimum Gross Internal Area of the dwelling (see section 2.1). Juliet balconies may assist in the creation of a suitable internal space in the absence of an external balcony or terrace.

### Baseline standards: Private open space

- A minimum of 5m<sup>2</sup> of private outdoor space should be provided for 1-2 person dwellings and an extra 1m<sup>2</sup> should be provided for each additional occupant.
- Balconies should be a minimum of 1.5m in width<sup>10</sup>
- Houses should have a private garden with a minimum length of 7m. 10m will normally be expected.

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<sup>10</sup> Area and width derived from HCA Housing Quality Indicators Version 4, Code for Sustainable Homes Technical Guide 2009- ENE4 and HEA3



## 2.6 Floor to Ceiling Heights

Generous ceiling heights make a home feel spacious. When matched with generous window sizes, they can also improve the quality of natural light and ventilation. In habitable rooms, ceiling heights of a minimum of 2.4m will be required, with a preference for 2.6m or more.

Further exceptions to the 2.4m standard will be considered where it can be demonstrated to be necessary to successfully relate new development to a surrounding context of historic buildings of architectural merit.

A lower ceiling height may be acceptable due to constraints associated with the conversion of existing buildings to residential use. In such cases, a minimum floor to ceiling height of 2.3 m is required across at least 60% of the floor area of habitable rooms.

In ground floor dwellings higher ceilings can provide a better urban scale to the base of larger buildings and make buildings more suitable for future conversion to non-residential uses. To allow for this, the ground floor of apartment buildings should ideally have a 3.0m floor to ceiling height.

### Baseline standards

- A minimum floor to ceiling height of 2.4 m is required in all habitable rooms in new development (finished floor level to finished ceiling level)
- In conversions of existing buildings to residential use, a minimum floor to ceiling height of 2.3m is required across at least 60% of the floor area of habitable rooms.

### Good practice standards

- A minimum floor to ceiling height of 2.6 m is encouraged in all habitable rooms in new development (finished floor level to finished ceiling level).
- A minimum floor to ceiling height of 3.0 m is encouraged at the ground floor of all apartment blocks.

## 2.7 Environmental comfort

Good natural light makes dwellings more attractive and energy efficient. All dwellings should achieve adequate levels of daylight. As a general rule of thumb this can be achieved by providing an area of glazing equivalent to 20% of the internal floor area of a room.

Ideally all dwellings should have sunlit living rooms and kitchen/dining spaces as these are the rooms most likely to be used for long periods in the daytime. Sunlight can have a significant impact on thermal comfort and the energy consumed for winter heating. A sunlit room is defined as having windows facing within 90 degrees of due south.

Dual aspect design will always be encouraged over single aspect flats as it provides for better daylight and ventilation, a choice of views, access to quieter rooms for all and greater flexibility in use. Single aspect dwellings will not be permitted if where they face over noisy or polluted environments (which may require permanent mechanical ventilation) or if the dwelling has three or more bedrooms. North facing single aspect flats are discouraged. Where they are provided they should form a small proportion of the total housing stock within large schemes (suggested figure of no more than 15%).

In order to mitigate the disadvantages of single aspect dwellings a larger minimum window area is encouraged.

### Baseline standards

- Single aspect dwellings will not be permitted where they face over polluted or noisy environment, or have three or more bedrooms.
- Where single aspect dwellings are proposed, it should be demonstrated that good levels of privacy, light and ventilation are provided to each habitable room and the kitchen.

### Good practice standards

- An area of glazing equivalent to 20% of internal floor area is required for all habitable rooms. Larger openings should be considered for single aspect dwellings.
- Direct sunlight should enter at least one habitable room for part of the day. The living, dining and kitchen spaces should preferably receive direct sunlight.
- North facing single aspect dwellings are discouraged (45 degrees either side of north). Where provided they should form only a small proportion of the overall housing stock within large schemes.

## Appendix 1 - Definition of Gross Internal Area

The definition of Gross Internal Area of a dwelling includes:

- Floor area measured between the inside faces of the finished enclosing walls of each unit, including the space taken up by the following:
  - Private staircases
  - Partitions
  - Internal walls
  - Heating appliances
  - Internal chimney breast projections
- Internal porches forming an integral part of the habitable space.
- Internal storage space greater than 1.5m in height.
- Conservatories forming an integral part of the habitable space.
- Additional and separate wc for houses of four or more people, additional wc for flats of five or more people.

The definition of Gross Internal Floor Area of a dwelling excludes:

- Perimeter wall thicknesses and external projections.
- Central lobby areas, passageways, and other communal areas shared with other units.
- Any space where the height to the ceiling is less than 1.5m (e.g. elements of rooms with sloping ceilings, external dustbin enclosures, etc.).
- Porches, covered ways, etc.
- Balconies (private, escape and access) and decks.
- Voids and air wells.
- Non-habitable basements, attics, thermal buffer zones or sheds.
- External storage space.
- All space for purposes other than housing (e.g. garages, commercial premises etc).
- Conservatories not forming an integral part of the habitable space.
- Studies, utility rooms or en-suite bathrooms.

## Appendix 2 – Space Standards Study (from London Housing Design Guide Interim Edition – Mayor of London August 2010)

	<b>Beds/bedspaces</b>					
	<b>1 Bsp</b>	<b>1 B, 2 Bsp</b>	<b>2 B, 3 Bsp</b>	<b>B, 4 Bsp</b>	<b>3 B, 5 Bsp</b>	<b>4 B, 6 Bsp</b>
<b>Kitchen</b>	6.2 sq.m	6.8 sq.m	7.5 sq.m	7.5 sq.m	8.3 sq.m	9.6 sq.m
<b>Dining</b>	9.4 sq.m Dining area 3.2 sq.m	10.4 sq.m Dining area 3.6 sq.m	11.2 sq.m Dining area 3.6 sq.m	12.0 sq.m Dining area 4.5 sq.m	12.8 sq.m Dining area 4.5 sq.m	14.4 sq.m Dining area 4.8 sq.m
<b>Living</b>	12.0 sq.m	13.0 sq.m	14.0 sq.m	14.8 sq.m	16.0 sq.m	17.0 sq.m
<b>Combined LDK</b>	21 sq.m	23 sq.m	25 sq.m	27 sq.m	29 sq.m	31 sq.m
<b>Double</b>		12.0 sq.m	12.0 sq.m	12.0 sq.m	12.0 sq.m	12.0 sq.m
<b>Twin</b>				12.0 sq.m	12.0 sq.m	12.0 sq.m
<b>Single</b>	8.0 sq.m		8.0 sq.m		8.0 sq.m	16.0 sq.m
<b>Bathroom</b>	Shower room 3.6 sq.m	Bathroom 4.4 sq.m	Bathroom 4.4 sq.m Wheelchair WC NO Shower 2.7 sq.m	Bathroom 4.4 sq.m Wheelchair WC No Shower 2.7 sq.m	Bathroom 6.8 sq.m Wheelchair WC WITH Shower 3.6 sq.m	Bathroom 6.8 sq.m Wheelchair WC WITH Shower 3.6 sq.m
<b>Storage/Utility</b>	1 sq.m	1.5 sq.m	2.0 sq.m	2.5 sq.m	Option : Utility room 3.6 sq.m	Option : Utility room 3.6 sq.m
<b>Outdoor Amenity Space</b>	4 sq.m	5 sq.m	6 sq.m	7 sq.m	8 sq.m	9 sq.m
<b>Net Internal</b>	33.5 sq.m	41 sq.m	51.5 sq.m 54.5 sq.m	58 sq.m 60 sq.m	71 sq.m 72 sq.m 72.sq.m	81.5 sq.m 82.5 sq.m 82.5 sq.m
<b>Circulation</b>	1 Level Flat + 1.5 sq.m	1 Level Flat + 6.5 sq.m	1 Level + 6.5 sq.m 2 Storey House + 19 sq.m	1 Level Flat + 8.5 sq.m 2 Storey House + 19 sq.m	1 Level Flat + 10.5 sq.m 2 Storey House + 19sq.m 3 Storey House + 25 sq.m	1 Level Flat + 12.5 sq.m 2 Storey House + 19 sq.m 3 Storey House + 25 sq.m
<b>Partition walls allow 5%</b>	2 sq.m	2.5 sq.m	3 sq.m 3.5 sq.m	3.5 sq.m 4.0 sq.m	4.5 sq.m 5.0 sq.m 5.0 sq.m	5.0 sq.m 5.5 sq.m 5.5 sq.m
<b>GIA</b>	<b>37 sq.m</b>	<b>50 sq.m</b>	<b>61 sq.m</b> <b>77 sq.m</b>	<b>70 sq.m</b> <b>83 sq.m</b>	<b>86 sq.m</b> <b>96 sq.m</b> <b>102 sq.m</b>	<b>99 sq.m</b> <b>107 sq.m</b> <b>113 sq.m</b>
<b>Circulation Layouts</b>	One level circulation area 6.5 – 12.5 sq.m	Two storey house circulation area 19 sq.m  Three storey house circulation 25 sq.m	<b>Variations 3-bed, 4-persons</b> 1 level flat: $70-12(8 \times 2) = 74$ sq.m 2 storey house: $83-12+(8 \times 2) = 87$ sq.m 3 storey house: $87+6 = 93$ sq.m <b>3-bed, 6-persons</b> 1 level flat: $99-16+12 = 95$ sq.m 2 storey house: $107-16+12 = 103$ sq.m 3 storey house: $113-16+12 = 109$ sq.m <b>4-bed, 5-persons</b> 1 level flat : $86-12+(8 \times 2) = 90$ sq.m 2 storey house: $96-12+(8 \times 2) = 100$ sq.m 3 storey house: $102-12+(8 \times 2) = 106$ sq.m			

### Appendix 3 - Furniture Schedule (from London Housing Design Guide Interim Edition – Mayor of London August 2010)

Type of Space	Furniture Schedule	Furniture Sizes	Dwelling Size							
			mm	1p	2p	3p	4p	5p	6p	7p
<b>Living Space</b>	Arm chair – combination to equal one seat/person	850x850	2	2	3	1	2	3	4	+1
	Settee – 2 seat (optional; as above)	850x1300								
	Settee – 3 seat (optional; as above)	850x1850				1	1	1	1	
	TV – [dim.Approx. 26" flat]	220x650	1	1	1	1	1	1	1	1
	Coffee Table	500x1050 or 750 diameter	1	1	1	1	1	1	1	1
	Occasional table	450x450					1	1	1	1
	Storage Units	500x1000/ Incrementally larger	1000	1000	1000	1500	2000	2000	2000	+
	PC/Laptop desk and chair	1050x500	1	1	1	1	1	1	1	1
	Space for visitor's chair	450x450	2	2	2	2	2	2	2	2
	<b>Dining Space</b>	Dining chair	450x450	2	2	3	4	5	6	7
Dining Table		800x800/ Incrementally larger	800	800	1000	1200	1350	1500	1650	+
Sideboard (but not in dining kitchen)		450x1000/ Incrementally larger	1000	1000	1000	1200	1500	1500	1500	+
<b>Bedrooms</b>										
<b>Double Bedroom Optional</b>	Double bed	2000x1500	n/a	1	1	1	1	1	1	1
	2 x Single bed	2000x900								
	Bedside table	400x400		2	2	2	2	2	2	2
	Dressing Table and chair/stool	500x1050		1	1	1	1	1	1	1
	Chest of Drawers	450x750		1	1	1	1	1	1	1
	Double wardrobe	600x1200		1	1	1	1	1	1	1
<b>Twin Bedroom</b>	2 x Single bed	2000x900	n/a			2	2	2	2	2
	Bedside table	400x400				2	2	2	2	2
	Chest of drawers	540x750				1	1	1	1	1
	Table and chair/stool	500x1050				1	1	1	1	1
	Double wardrobe	600x1200				1	1	1	1	1

Type of Space	Furniture Schedule	Furniture Sizes	Dwelling Size								
			mm	1p	2p	3p	4p	5p	6p	7p	+
<b>Single Bedroom</b>	Single bed	2000x900	1		1	1	1	1	1	1	1
	Bedside table	400x400	1		1	1	1	1	1	1	1
	Chest of drawers	450x750	1		1	1	1	1	1	1	1
	Table and chair/stool	500x1050	1		1	1	1	1	1	1	1
	Single wardrobe	600x600	1		1	1	1	1	1	1	1
	Total bed spaces		1	2	3	4	5	6	7	+	
<b>Kitchen</b>			Length in mm								
Optional	1. Sink top drainer	600x1000	1000	1000	1000	1000	1000	1000	1000	1000	1000
	2. Cooker space	600x600	600	600	600	600	600	600	600	600	600
	3. Washing machine position/worktop	600x630	630	630	630	630	630	630	630	630	630
	4. Other base units	600x Length	600	1200	1600	1600	1600	2700	2700	+	
	4a. Dishwasher/worktop- (included in 4)	600x Length									
	5. Ancillary equipment space	600x Length					600	600	1200	1200	
	6. Fridge/freezer space	600x600	600	600	600	600	600	600	600	600	600
	7. Hot water cylinder	600x600x1950[H]	600	600	600	600	600	600	600	600	600
	8. Tray Space	600x150	inc	inc	inc	inc	inc	inc	inc	inc	inc
	9. Recycling bins space	600x Length	300	300	300	300	600	600	600	600	600
	10. Length of fitments (items 1 to 9)		4330	4930	5330	5330	6230	7330	7930	+	
Note: Item 3,5,6,7,9 may be in adjacent rooms to the kitchen											
<b>Bathroom</b>	WC + cistern	500x700	1	1	1	1	1	1	1	1	1
	Bath	700x1700	1	1	1	1	1	1	1	1	1
	Wash hand basin	600x400	1	1	1	1	1	1	1	1	1
<b>Optional Separate Toilet</b>	Shower tray	750x750									
<b>Storage</b>	WC + cistern					1	1	1	1	1	1
	Cloakroom basin					1	1	1	1	1	1
			Area in m								
<b>Storage</b>	Cumulative total of built-in storage		1	1.5	2	2.5	3	3.5	4	0.5	

## **Appendix 4 - References**

Housing standards: evidence and research. Dwelling size survey. A report prepared by Scott Wilson for CABE in April 2010.

BRAC (08)P4 - Building Regulations Advisory Committee – Lifetime Homes, BRAC Secretariat 21 February 2008

London Housing Design Guide Interim Edition – Mayor of London August 2010

Space in New Homes: What residents think, CABE 2009

Cost and Delivery Impact Assessment – Interim London Housing Design Guide

Panel Report on Draft Replacement London Plan, EiP – March 2011

A Dwelling Size Survey for Medway & Implications for the Medway Housing Design Standards - May 2011

Living at Superdensity (Design for Homes, 2007)

## Appendix 5 - Consultation

The draft Medway Housing Design Standards were issued for public consultation from 1 Nov -10 Dec 2010. They were sent via e-mail to approximately 350 consultees comprising developers, designers and their agents and other major stakeholders involved in the planning and delivery of housing development in Medway. 17 responses to the consultation were received, including a joint letter from several major house builders.

The draft Standards were also presented and discussed at the Medway Major Developers forum on 21<sup>st</sup> June 2011.

### Issues:

The key issues raised by respondents to the consultation fall into three main categories:

- a) *Principle* - The large developers, Affordable Housing Providers Forum and MHS Homes Group expressed general scepticism about the introduction of standards that will increase construction costs at a time of gradual housing market recovery. The standards were also felt to be more generous than is necessary to allow adequate living conditions.
- b) *Implementation* - questions regarding the status of the Standards as a supplementary planning document (SPD) and the timetable for its implementation, particularly in the context of the changing regulatory climate at the national level.
- c) *Detail* - all respondents provided varying amounts of detailed feedback on the content of the draft document. This will contribute to a constructive process of refinement of the standards.

### Impact assessment

In response to developers' concerns an impact assessment of the effect of the standards on development was carried out as follows:

- a) a dwelling size survey of recent planning applications was undertaken to assess the extent to which the proposed space standards exceed that typically delivered in housing development in Medway in recent years.
- b) The option of adopting a 'lower' set of 'minimum' standards was considered.

The key findings of the Dwelling Size Survey were as follows:

- The standards may cause an average increase in the size of flats of between 2%-5% overall.
- 62% of 1B2P flats, 36% of 2B3P flats and 57% of 2B4P flats in recent developments would have failed to comply with the minimum standard. The vast majority were within 10% of the Medway Standards, but the smallest flats (a small proportion) fell well short.



- The majority of smaller house types (two bedroom/ four person) in recent developments do not comply with the minimum standard.
- On almost all schemes some dwelling types met the proposed Medway standard and others did not. A few schemes had dwellings that were universally small.
- A greater proportion of the shortfall in the Gross Internal Area of the smaller house types relates to circulation, storage and other ancillary space than to the net area of the main living spaces (bedrooms, kitchen, dining and living areas).
- The majority of larger house types meet the standard.
- Furniture plans were plotted on some of the dwelling type plans. These revealed that dwelling plans that fell short of the proposed standards are indeed cramped.

In conclusion, the standards will result in larger dwellings in general. The required increase for flats and for larger houses is relatively small. There will be greater implications for smaller house types.

The proposed Medway standards follow those set out in the recently adopted London Plan. These are based on ergonomic studies and include a requirement to meet Lifetime Homes Standards and building regulations. The recent publication of the Panel Report on the Examination in Public (EiP) of the draft replacement London Plan considered in detail the question of whether the proposed standards were overgenerous. It concluded

*“There was relatively little debate on the figures for gross internal floor areas suggested by the Mayor... Broad consensus is perhaps unsurprising given that the figures specified follow from work undertaken nationally by the Homes and Communities Agency and effectively derive from a simple exercise in ergonomics. That... was based on assessing the space required to accommodate a basic inventory of furniture together with adequate access, circulation and amenity space, with Lifetime Homes also being taken into account”.*

In conclusion, the Standards are robust and do not set an over generous standard.

### **Alterations to document:**

In response to developers concerns the following alterations have been made:

- The Standards are issued as Interim guidance pending the adoption of the LDF and possible changes to the regulatory planning system.
- Medway Housing Design Standard is now a ‘deemed adequate’ standard. Developers will be given the flexibility to demonstrate that their proposed house types are of an adequate size by using the other standards such as Housing Corporation ‘Housing Quality Indicators’ or by showing furniture layouts on plans.

- Further flexibility is built in with a range of '*base line*' standards (that should normally be adhered to) and '*good practice*' standards that will be encouraged.
- Within limits dispensations have been built in for historic buildings and for sites with outline permission which have yet to come forward for detailed permission.
- Sections of this document have been re-worded to reduce any scope for misinterpretation;
- Standards proposed in the draft document have been removed where their implementation may have proved difficult to achieve in practice or where they are covered to some extent by other policy; and
- A number of minor corrections, additions and amendments to the draft will be undertaken in response to the detailed issues and topics raised by the consultation.