

## CABINET

1 NOVEMBER 2011

### INTERIM MEDWAY HOUSING DESIGN STANDARDS- PLANNING GUIDANCE

Portfolio Holder: Councillor Jane Chitty, Strategic Development and Economic Growth

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 aim to provide guidance to developers, landowners and their advisors on the layout and space standards expected in the design of new housing and the conversion of existing properties. Compliance will be a consideration when assessing planning applications and will apply to all planning applications for dwellings.

The Interim Standards have been the subject of an extensive consultation process. 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 Interim 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 Standards will assist in achieving the Council core priority of '*everyone benefiting from the area's regeneration.*' They 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. Planning Committee has 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 Standards address these issues by providing technical *requirements* that will be a consideration in the granting of planning permission. At the core of the Standards is a set of target space requirements that lay down minimum sizes for rooms around the home.
- 2.4 The Interim Standards align with the London Housing Design Guide. This guide 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 A copy of the Interim Medway Housing Design Standards is attached at Appendix 1.

### **3. 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:
- Four are large house builders active in the Medway area
  - Three are large landowner/developers including Land Securities at Lodge Hill.
  - Four 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 Interim Standards would increase construction costs and affect the viability of schemes at a time of gradual housing market recovery. The Interim 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 Interim 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 Interim 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 Interim 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 Interim Standards. The vast majority were within 10% of the 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 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 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 Panel Report on the Examination in Public (EiP) of the draft replacement London Plan considered in detail the question of whether the London standards were overgenerous. It stated:

*“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 Based on the evidence above, the Interim Standards are considered 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 were based on assumptions with regard to housing sizes and therefore housing numbers. The introduction of the Interim 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 Interim 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. However, this is not certain. Overall there is some uncertainty about the future of space standards applied via the planning system.
- 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- firstly as interim guidance and then 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;

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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).

- Allow for a period of testing and monitoring of the application of the Interim 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 have been undertaken in response to the detailed issues and topics raised by the consultation. In particular, further flexibility has been 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. Regeneration, Community & Culture Overview and Scrutiny Committee**

5.1 The Regeneration, Community and Culture Overview and Scrutiny Committee met on 4 October 2011 and considered this report as part of the public consultation process.

5.2 The committee welcomed the Interim Housing Design Standards but indicated that the guidance should not be so flexible. Members re-iterated their concern that although some housing was built with the intention of being 'starter homes', too often these eventually became family homes and anything that could be achieved to improve smaller dwelling standards was to be welcomed and introduced as soon as possible.

5.3 Members also considered that the option of flexibility in applying the Interim Standards might also place planning officers in a difficult position over the transparency and consistency of the flexibility agreed in negotiations between different developers and that this could cause problems in the future.

5.4 The committee agreed that it would be difficult to justify adherence to this guidance on sites where outline permission had already been granted, but that the guidance should apply to all new applications.

5.5 The committee agreed to recommend the Interim Medway Housing Design Standards – Planning Guidance to Cabinet for approval suggesting the removal of the option for flexibility to be negotiated with developers, in order to safeguard officers over the transparency and consistency of developments.

## 6. Director's Comments

- 6.1 Since the Overview and Scrutiny Committee minor revisions have been made to the document. This is to emphasise that the flexibility built into the Interim Standards can only be applied within strictly defined parameters.

## 7. 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 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.

## 8. Diversity Impact Assessment

- 8.1 A Diversity Impact Assessment screening form has been completed and is attached as Appendix 2. It shows that people with physical disabilities and the elderly are key groups that stand to benefit from Interim Standards and the resultant flexible and adaptable housing. The benefits are universal – no one group will not have greater access to the benefits of these policies than others.

## **9. Financial and legal implications**

- 9.1 Adoption of Interim Medway Housing Design Standards will assist the Council in applying a consistent methodology in assessing housing design and so 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).
- 9.2 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. There are no other financial implications.

## **10. Recommendations**

- 10.1 The Cabinet is requested to consider the comments of the Regeneration, Community and Culture Overview and Scrutiny Committee and approve the Interim Medway Housing Design Standards.

## **11. Suggested Reasons for Decision**

- 11.1 The Interim Medway Housing Design Standards, which have been the subject of an extensive consultation process, 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.

### **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)**

**November 2011**



# Contents

## Background

What are the Interim Medway Housing Design Standards?	5
Status of the Standards	5
Why do we need Standards?	6
How are the standards derived?	6
Lifetime Homes Standard	6
Flexibility	7
Compliance	7
Alternative methodologies	8
Working with the Standards	8
Planning Applications: information requirements	9

<b>Summary Table</b>	10-13
----------------------	-------

## 1. From Street to Front Door

1.1 Outdoor Amenity Space and Parking Provision	15-16
1.2 Shared Access and Circulation	17-18
1.3 Cycle Storage, Refuse and Recycling	19
1.4 Management	20

## 2. Dwelling Space Standards

2.1 Internal Floor Area	22
2.2 Living/Dining/Kitchen	23
2.3 Bedroom	24
2.4 Circulation, Storage and Utility	25
2.5 Visual privacy and private open space	26-28
2.6 Floor to Ceiling Heights	29
2.7 Environmental comfort	30

## Appendix 1 Definition of Gross Internal Floor Areas

## Appendix 2 Space Standards Study

## Appendix 3 Furniture Schedule

## Appendix 4 References

## Appendix 5 Consultation



# 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.

It is therefore proposed to introduce the Standards in a two-phases- first as interim guidance and later formally adopted as a formal Supplementary Planning Document (SPD) following the adoption of 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 which have housing as a component of the land use mix.

## **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 to cater for changing lifestyles;

The Standards therefore set minimum requirements relating to a number of aspects of housing layout and design.

## **How are the Standards derived?**

The Interim Medway Housing Design Standards are based on 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 a robust evidence base based on anthropomorphic data. It is simple to apply and will be familiar to many developers 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, the Lifetime Homes Standard 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).

## **Lifetime Homes Standard**

The Lifetime Homes Standard is a series of criteria aimed at ensuring that new housing meets the changing needs of diverse households. Housing that meets the Lifetime Homes Criteria will be convenient for most potential occupants, including some (but not all) wheelchair users and disabled visitors

The Lifetime Homes Criteria are (where relevant to planning) included within the interim Medway Housing Design Standards as 'good practice' guidelines<sup>1</sup> (see below). They are, however, likely to become mandatory in Medway upon adoption of the Core Strategy of the Local Development Framework in late 2012.

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<sup>1</sup> The Medway Housing Design Standards summarise the Lifetime Homes Criteria. Designers should reference the full Lifetime Homes criteria at <http://www.lifetimehomes.org.uk/>

## 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:

**'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 by significant margins (see above), 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 may have fixed room sizes that fall below the required room sizes laid out in this document. Compliance with the Standards when converting 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 seeking outline planning permission for sites, developers will have made assumptions about the numbers of dwellings each site can accommodate.

The Council 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) which are now coming forward for detailed permission. It should be noted, however, that exceptions

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.

## **Alternative methodologies**

Although this interim guidance is based on the solid anthropological data of other studies, it will be acceptable for developers to 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 dwelling 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 10 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 baseline standards and also indicate which of the good practice standards are being met.

The following information for each dwelling or dwelling type is required in accordance with the schedule overleaf:

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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 Standard.



## Planning Applications: Information requirements

### *Detailed planning applications*

Applicants should provide the following information to enable conformity with the Medway Housing Design Standards to be assessed:

For each dwelling type:

- floor plan at a minimum scale of 1:00
- 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.

### *Outline planning applications:*

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 demonstrate that compliance can be achieved in subsequent reserved matters applications. This can be done by:

- the submission of a selection of illustrative dwelling plans;
- an indication of the proposed Gross Internal Floor Areas (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	<b>From Street to Front Door</b>	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 10m		✓
	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		✓
	One car parking space adjacent to a building entrance should be a minimum width of 3.3m		✓
	The distance from car parking spaces to building entrances should be kept to minimum and should be level or gently sloping (1:60 max).		✓
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, should have level access over the threshold.		✓
	The approach to entrances should be level or gently sloping		✓
	Landings/hall areas should minimum dimensions of 1.5mx1.5m to serve lifts and communal entrances	✓	
	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.	✓	
	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 for some natural light and ventilation.	✓	
	Lifts should be provided in all apartment buildings where dwellings are entered at or above the fourth floor (fifth storey).	✓	
	Two lifts should be provided for flats on or above the 6 <sup>th</sup> floor.	✓	
	Lifts should have a minimum internal core size of 1100 x 1400 (8 person lift). This should be a minimum of 1300 x 1400mm on or above the 6 <sup>th</sup> floor (7 <sup>th</sup> storey).	✓	
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 (for developments of over 10 dwellings and with communal parts)</b>		
	A landscape management and building management plan must be submitted and agreed prior to the occupancy of the development.		
	The plans must specify who will manage the development and how.	✓	

	The plans should provide a means of communicating with the leaseholders and freeholders		✓																																		
	The plans 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="6">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>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> )																																			
Flat	1b2p	50																																			
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	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																																			
	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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	A living room/living space should be provided at the entrance level of every dwelling		✓																																		
	Living and dining rooms/ areas should be capable of accommodating a clear turning circle of 1500mm diameter or a turning eclipse of 1400x 1700mm		✓																																		
	Essential circulation routes should have a clear width of 750mm between furniture items.		✓																																		
	Kitchens should have a clear width of 1200mm between kitchen units and any fixed obstruction opposite.		✓																																		

<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.	✓	
	The main bedroom in a dwelling should be capable of having a clear space, 750mm wide, to both sides and the foot of a double bed. Other bedrooms should be capable of having a clear space, 750mm wide, to one side and the foot of a bed.		✓
	In dwellings of two or more storeys with no permanent bedroom at entrance level, there should be space at the entrance level that can be used convenient temporary bed space.		✓
	A reasonable route should be provided between the main bedroom and the bathroom for a ceiling hoist.		✓
<b>2.4</b>	<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.	✓	
	Straight stair runs should be provided.		✓
	Landings and hallways within dwellings should have a minimum width of 900mm.		✓
	The entrance level of a dwelling should have an accessible WC compartment with the potential for a shower to be installed.		✓
	The design of a dwelling of two or more storeys should have the potential for stair lift installation and an identified space for a through-the-floor lift from the entrance level to a storey containing a main bedroom and bathroom.		✓
<b>2.5</b>	<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 (balcony or roof terrace) should be provided for 1-2 person flat and an extra 1m <sup>2</sup> should be provided for each additional occupant of the flat.	✓	
	The minimum width of private open space should be 1.5m	✓	
	Private open space should be adjacent to living or dining rooms		✓
	Private open space should provide privacy to and from the private open space of adjacent dwellings and from overlooking the habitable rooms of adjacent dwellings.		✓
	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.	✓	
<b>2.6</b>	<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).	✓	
	A minimum floor to ceiling height of 2.6m is encouraged in all habitable rooms (finished floor level to finished ceiling level).		✓

	In conversions of existing buildings to residential use, a minimum floor to ceiling height of 2.2m 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.		✓
<b>2.7</b>	<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)		✓
	Windows in the principal living space of a dwelling should allow people to see out (i.e. glazing starts at 800mm above floor)		✓
	Within each habitable room, there should be the potential for a 750mm approach route to enable a wheelchair user to approach windows.		✓

## **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. 10m 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 10m 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, the Building for Life criteria 8, 11, 12 & 16, as well as Lifetimes Homes Standards 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.
- Where a dwelling has car parking within its individual plot, at least one space should have a minimum width of 3.3m
- Where parking is provided by communal or shared bays, at least one space of a minimum width of 3.3m should be provided adjacent to each block entrance or lift core (Lifetime Homes Criterion 1).
- The distance from car parking spaces to the dwelling entrance (or lift core) should be kept to a minimum and should be level or gently sloping (not exceeding 1:60) (Lifetime Homes Criterion 2)

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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 (Lifetime Homes Criteria 4). A minimum landing/ hall area of 1.5 x 1.5m is required to serve lifts and communal entrances (Lifetime Homes Criteria 4 and 5). In larger developments entrance lobbies may be used for post, cycle storage and buggies.

A width of 1.5m is 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 allow for natural light and ventilation and for persons within the building to orientate themselves with respect to the external environment.

### *Shared access and circulation*

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 schemes are suitable for a wide range of residents, and in ensuring that the blocks of flats 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. At least one lift per core should therefore be provided in all blocks of flats where dwellings are entered on or above the fourth storey (third floor). 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).

All lifts should conform the Lifetime Homes criterion 5 which requires an internal car size large enough to accommodate a wheelchair user and a companion. Larger lifts than this are desirable to facilitate the movement of bulky furniture, bicycles, stretchers and coffins. They are 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 (Lifetime Homes criterion 6). 1.5m is required where corridors are double loaded or serve wheelchair accommodation.
- Landing/ hall areas should have minimum dimensions of 1.5 x 1.5m to serve lifts and communal entrances (Lifetime Homes Criteria 4 and 5).
- Double loaded corridors 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 third floor (fourth 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 is required (Lifetime Homes Criterion 5). 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

- All entrances should be illuminated, have level access over the threshold, and clear opening widths. Main entrances should be covered and have a level external landing (Lifetime Homes criterion 4).
- The approach to all entrances should be level or gently sloping (Lifetime Homes criterion 3).
- Communal stairs providing a principle access route to a dwelling should have a rise not exceeding 170mm and a going not less than 250mm. (Lifetime Homes criterion 5)
- No more than:
  - 8 flats served per circulation core per floor
  - 25 flats per circulation core

## 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 section 2.1).
- Requirements for waste and recycling must be in accordance with the Medway Council document '*Waste and Recycling requirements for residential developments in Medway*'.

## 1.4 Management

Housing developments with a significant element of communal external areas, indoor common areas, and (with flatted development) common building parts (common internal areas, external walls, roofs, windows) are reliant on high quality management for their enduring success.

The Council will apply planning conditions on landscape maintenance to planning permissions for major schemes<sup>5</sup> with extensive communal external areas. The condition will require the submission and agreement of a Landscape Management Plan prior to the occupancy of the scheme.

In addition this, the Council will apply planning conditions on management and maintenance of the common parts of buildings to planning permissions for major schemes. The conditions will require the submission and agreement of a Building Management Plan prior to the occupancy of the scheme.

The Landscape and Building Management Plans should provide details on:

- cleaning and maintenance of common parts,
- 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

- A landscape management plan and a building management plan must be submitted and agreed for major schemes with common external and building areas.
- The Management Plans must specify who will manage the development and how.
- The Management Plans should set out maintenance objectives and standards, the method of response to reports of failure, and the frequency and scope of cyclical works including cleaning, maintenance and replacement.
- The Management Plans should specify how replacement and maintenance works will be funded and the charges that the freeholder or landlord will make to procure and manage them.

### Good practice standards

- The plans should provide a means of communicating with all tenants and include an obligation to consult them on management matters.

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<sup>5</sup> Normally defined as 10 dwellings or more with common parts (land or building elements). The Council reserves the right to apply such conditions to schemes with less dwellings than this if it is deemed necessary.

## 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 sleeping, living, eating and storage space for four people. 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, developments should provide a mix of dwelling types and sizes to ensure a balanced housing mix and a good match between housing need and supply.

In relation to the Medway Housing Design Standards, it will not be acceptable for a development to have smaller 2-bedroom/3-person 61sq.m flats as a specific means of avoiding the construction of any larger 2-bedroom/four-person 70sq.m flats. Similar reasoning will be applied to the range of houses to be provided within any one scheme.

## 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. The minimum GIA reflects the space required for all potential occupants to sit, eat and talk together and the space required to store their possessions, as well as space required for adequate sleeping accommodation. The GIA is also influenced by the number of storeys in a dwelling as this has an impact on the amount of circulation space (stairs and hallways) 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 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.

## 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. An entirely open-plan layout is therefore 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.

In order to meet the potential needs of the widest possible range of residents it is highly desirable that living rooms, dining rooms and kitchens meet Lifetime Homes criteria 7 and 8.

### Baseline standards

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

### Good practice 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.
- A living room/living space should be provided on the entrance level of every dwelling (Lifetime Homes Criterion 8)
- Living rooms/areas and dining rooms/areas should be capable of having either a clear turning circle of 1500mm diameter, or a turning eclipse of 1700x1400mm (Lifetime Homes Criterion 7).
- Where movement between furniture is necessary for essential circulation a clear width of 750mm between furniture items is necessary (Lifetime Homes Criterion 7).
- Kitchens should have a clear width of 1200mm between kitchen units and any fixed obstruction opposite- i.e. walls or other units (Lifetime Homes Criterion 7).

## 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 that are 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.

In order to meet the potential needs of the widest possible range of residents it is highly desirable that bedrooms meet Lifetime Homes criteria 7, 9, 13 and 14.

### Baseline Standards

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

### Good practice standards

- 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 main bedroom in a dwelling should be capable of having a clear space, 750mm wide, to both sides (excluding bedside cabinets) and the foot of a standard double bed (Lifetime Homes Criterion 7)
- Other bedrooms should be capable of having a clear space, 750mm wide, to one side and the foot of a bed (Lifetime Homes Criterion 7).
- In dwellings of two or more storeys with no permanent bedroom at entrance level, there should be space at the entrance level that can be used convenient temporary bed space. (Lifetime Homes Criterion 9).
- Structure above a main bedroom and bathroom should be capable of supporting ceiling hoists and the design should provide a reasonable route between this bedroom and the bathroom. (Lifetime Homes Criterion 13)
- An accessible bathroom should be provided on the same storey as a main bedroom (Lifetime Homes Criterion 14).



## 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 are encouraged to allow for ease of moving furniture, whilst hallways and landings should conform with Lifetime Homes Standards.

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.
- Landings and hallways should have a minimum width of 900mm (Lifetime Homes Criterion 6)
- Where an accessible entrance level bathroom is not provided, the entrance level should have an accessible WC compartment with potential for a shower to be installed (Lifetime Homes Criterion 10)
- The design within a dwelling of two or more storeys should incorporate:
  - The potential for stair lift installation (this generally means straight stair runs); and
  - a suitable identified space for a through-the-floor lift from entrance level to a storey containing a main bedroom and bathroom. (Lifetime Homes Criterion 12)

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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 London Plan (July 2011) 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 meet this requirement.

There is a case for accepting less privacy 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 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.

Where exceptions are made, it will still be necessary to provide some visual privacy. Design features that can 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.

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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 at a height of 2m above habitable room floor level, 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.

## Baseline standards: visual privacy

- A minimum distance of 20m is required between the rear facades of homes in new development and between new and existing dwellings;
- In the case of:
  - sites 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 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*;
- Exceptions will be made for infill development that is no higher than the general height of existing buildings provided that some visual privacy can be achieved.

## 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 across the width of the dwelling will, in most cases, be sufficient to provide:

- a sitting out area,
- small shed,
- clothes drying area,
- area of play
- space to plant shrubs and small trees.
- for a future single storey extension of no more than 3m in length (i.e. one that could be constructed under permitted development rights<sup>10</sup>) whilst retaining a usable (albeit very small) garden.

In locations where space is constrained a reduced 7m standard will be acceptable for new planning applications but not encouraged.<sup>11</sup>

<sup>10</sup> 'Permitted development' is the alteration or extension of a single dwelling house which is allowed without the requirement to apply for planning permission. Flats, commercial premises and some dwellings in conservation areas do not have permitted development rights. Residents should always check whether planning permission is required before going ahead with building works.

<sup>11</sup> Subject to visual privacy considerations

All flats should have access to private outdoor space in the form of a terrace or balcony immediately adjacent to the dwelling. The requirement for private outdoor space has been established by considering the minimum area for:

- clothes drying,
- a meal around a small table, and
- family and visitors to sit outside.

Private outdoor space should preferably be located next to a dining or living space. They should be designed to provide as great a degree of privacy as possible from neighbours' habitable rooms and adjacent balconies. 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 private outdoor space. 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;
- Where the provision of balconies may raise issues of privacy and overlooking of neighbouring properties; and
- In areas where the provision of balconies would adversely affect the prevailing character of an area.

Balconies should be provided on rear or side elevations in cases where they may be deemed unsuitable on a front elevation.

Where it is not suitable to provide balconies or terraces amenity needs should be met with an internal 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).

#### **Baseline standards: Private open space**

- Houses should have a private garden with a minimum length of 7m. 10m will normally be expected.
- 1-2 person flats should have a minimum of 5sq.m of private outdoor space. An additional 1m<sup>2</sup> should be provided for each additional occupant.
- Balconies should have a minimum depth of 1.5m<sup>12</sup>

#### **Good practice standards: Private open space**

- Private open space should be adjacent to living or dining rooms.
- Private open space should provide privacy to and from the private open space of adjacent dwellings and from overlooking the habitable rooms of adjacent dwellings.

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<sup>12</sup> Area and width derived from HCA Housing Quality Indicators Version 4, Code for Sustainable Homes Technical Guide 2009- ENE4 and HEA3

## 4.6 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 2.2 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, it is good practice for the ground floor of apartment buildings to have a minimum floor to ceiling height of 3.0m.

### 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 2.2m 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.

Dual aspect design<sup>13</sup> will always be encouraged over single aspect flats as it provides for better daylight and ventilation, a choice of views, access to quieter rooms and greater flexibility in use.

Single aspect dwellings<sup>14</sup> will not be permitted where they face over noisy or polluted environments<sup>15</sup> (which may require permanent mechanical ventilation) or if the dwelling has three or more bedrooms. North facing<sup>16</sup> single aspect flats are discouraged. Where they are provided they should form a small proportion of the total housing stock within large schemes<sup>17</sup>.

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

In order to meet the potential needs of the widest possible range of residents it is desirable that windows meet Lifetime Homes Criterion 15.

### Baseline standards

- Single aspect dwellings will not be permitted where they face over polluted or noisy environment, or have three or more bedrooms.
- 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.

### Good practice standards

- 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.
- Windows in the principal living space of each dwelling should allow people to see out (i.e. glazing starts at 800mm above floor level) (Lifetime Homes Criterion 15)
- Within each habitable room there should be the potential for a 750mm approach route to enable a wheelchair user to approach windows (Lifetime Homes Criterion 15).

<sup>13</sup> Dual aspect dwelling- defined as one that has front and rear windows and rooms, or front and side windows and rooms.

<sup>14</sup> Single aspect dwelling- defined as having windows and rooms all facing in one direction.

<sup>15</sup> Noise categories C or D, and Air Quality Management Areas.

<sup>16</sup> A north facing room is one which is orientated 45 degrees either side of north.

<sup>17</sup> Suggested figure of no more than 15% for schemes of 10 flats or more.

## 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.
- Cycle stores
- 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</b>	Shower tray	750x750									
<b>Separate Toilet</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.

Space in New Homes: What residents think- CABE 2009

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

Cost and Delivery Impact Assessment – Interim London Housing Design Guide, August 2010

Panel Report on Draft Replacement London Plan, Examination in Public– March 2011

Living at Super-Density- Design for Homes, 2007)

The Case for Space, RIBA, September 2011.

A Dwelling Size Survey for Medway & Implications for the Medway Housing Design Standards – Medway Council, May 2011

Good practice guide 'Site layout planning for daylight and sunlight'- Building Research Establishment

## 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. Never the less it is recognized that floor plans that provide for an adequate inventory of furniture but which do not meet the Lifetime Homes Standard will be a little smaller than the floor areas indicated in this document. This is particularly the case with small 2-bedroom/ 4-person houses.

## **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 Standards are now a ‘deemed adequate’ standard. Developers will be given the flexibility to demonstrate that

their proposed house types are of an adequate size by showing furniture layouts on plans. This is likely to mean that slightly smaller plan sizes are acceptable – particularly if Lifetime Homes Standard is not followed.

- 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.
- Full cross-reference is given with the Lifetime Homes Standard. This standard is categorised in the interim Medway Housing design Standards as 'good practice' (as opposed to 'baseline');
- 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.

<p><b>Directorate</b></p> <p>Regeneration, Community and Culture</p>	<p><b>Name of Function or Policy or Major Service Change</b></p> <p>Medway Housing Design Standards Planning Guidance</p>		
<p>Officer responsible for assessment</p> <p>Martin McKay</p>	<p>Date of assessment</p> <p>14/10/11</p>	<p>New or existing?</p> <p>New.</p>	
<p><b>Defining what is being assessed</b></p>			
<p><b>1. Briefly describe the purpose and objectives</b></p>	<p>The Medway Housing Design Standards is planning guidance that will provide developers, landowners and their advisors with clear advice on the main principles and minimum 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 proposals involving new units of accommodation.</p>		
<p><b>2. Who is intended to benefit, and in what way?</b></p>	<p>It is intended to benefit all residents of Medway by ensuring high standards of accommodation in all new dwellings including those created by conversion of existing buildings.</p>		
<p><b>3. What outcomes are wanted?</b></p>	<p>The objective of the SPD is to ensure that all development:</p> <ul style="list-style-type: none"> <li>▪ provides a standard of accommodation that enables occupants to comfortably undertake their day-to-day living activities;</li> <li>▪ is flexible and generous enough to allow adaptation to meet future demands and cater for changing lifestyles;</li> <li>▪ combines efficient land use with the environmental benefits of well-designed, well-managed housing.</li> </ul>		
<p><b>4. What factors/forces could contribute/detract from the outcomes?</b></p>	<p>Contribute</p> <ul style="list-style-type: none"> <li>▪ Clarity of document</li> <li>▪ Approval of document</li> <li>▪ Support of stakeholders and interested parties</li> </ul>	<p>Detract</p> <ul style="list-style-type: none"> <li>▪ Unclear document</li> <li>▪ Document not approved</li> <li>▪ Lack of support from stakeholders and interested parties</li> </ul>	
<p><b>5. Who are the main stakeholders?</b></p>	<p>This guide will provide developers, landowners and their advisors with clear advice on the main principles and minimum layout and space standards that will be expected in the design of new housing and in the conversion of existing properties. The immediate stakeholder groups are therefore those directly involved in the provision of housing.</p> <p>The stakeholders who will benefit are all residents of new properties</p>		
<p><b>6. Who implements this and who is responsible?</b></p>	<p>Compliance will be a consideration in the granting of planning permission and will apply to all proposals involving new units of accommodation. Therefore implementation will be via the operation of the statutory</p>		

	town planning system. Medway Council is responsible as the planning authority.	
<b>Assessing impact</b>		
<b>7. Are there concerns that there <u>could</u> be a differential impact due to <i>racial/ethnic groups</i>?</b>		The Guidance applies universally to all new housing in Medway. There will be no differential impacts due to racial/ethnic groups.
	<b>NO</b>	
<b>What evidence exists for this?</b>	The Guidance will ensure larger room sizes and better accessibility as compared to recent new housing new housing. All racial/ethnic groups would be benefit from the policy.	
<b>8. Are there concerns that there <u>could</u> be a differential impact due to <i>disability</i>?</b>		The Guidance applies to all to new housing in Medway. People with physical disabilities and the elderly are key groups that stand to benefit from improved space standards and more flexible and adaptable housing but the benefits are universal – i.e. they will not have greater access to the benefits of these policies than others.
	<b>NO</b>	
<b>What evidence exists for this?</b>	Specialist housing providers have been consulted and have given their opinions on the guidance. The guidance is based in part on the well-known and respected Lifetime Homes standard that is specifically geared at meeting the existing and changing needs of 'diverse households'.	
<b>9. Are there concerns that there <u>could</u> be a differential impact due to <i>gender</i>?</b>		The Guidance applies universally to new housing in Medway. There will be no differential impacts due to gender.
	<b>NO</b>	Mothers (and fathers) with children and prams are key groups that stand to benefit from the standards - but the benefits are universal – i.e. they will not have greater access to the benefits of these policies than others.
<b>What evidence exists for this?</b>	The Guidance is based in part on the well-known and respected Lifetime Homes standard that is specifically geared at meeting the existing and changing needs of 'diverse households, including easy of access to dwellings by foot and from cars, plus additional storage and circulation space for prams, minimum private open space standards.  The Guidance will ensure larger room sizes than those that have been provided to date in new housing. Both genders will be able to make equal use of the policy.	
<b>10. Are there concerns there <u>could</u> be a differential impact due to <i>sexual orientation</i>?</b>		The Guidance applies universally to new housing in Medway. There will be no differential impacts due to sexual orientation.
	<b>NO</b>	
<b>What evidence exists for this?</b>	The Guidance will ensure larger room sizes than those that have been provided to date in new housing. All people, regardless of sexual orientation, will be able to make equal use of the policy.	
<b>11. Are there concerns there <u>could</u> be a have a differential impact due to <i>religion or belief</i>?</b>		The Guidance applies universally to new housing in Medway. All religious groups would be able to make equal use of the policy.
	<b>NO</b>	
<b>What evidence exists for</b>	The Guidance will ensure larger room sizes than those	



<b>this?</b>	that have been provided to date in new housing. All people, regardless of religion, will be able to make equal use of the policy.	
<b>12. Are there concerns there <u>could</u> be a differential impact due to people's age?</b>		The Guidance applies universally to new housing in Medway. The elderly is a key group that stands to benefit from improved space standards in the guidance and more flexible and adaptable housing but the benefits are universal – i.e. they will not have greater access to the benefits of these policies than others.
	<b>NO</b>	
<b>What evidence exists for this?</b>	Specialist housing providers have been consulted and have given their opinions on the guidance. The guidance is based in part on the well-known and respected Lifetime Homes standard that is specifically geared at meeting the existing and changing needs of 'diverse households'- including the needs of older people.	
<b>13. Are there concerns that there <u>could</u> be a differential impact due to <i>being trans-gendered or transsexual</i>?</b>		The Guidance applies universally to new housing in Medway. There will be no differential impacts due to being trans-gendered or transsexual.
	<b>NO</b>	
<b>What evidence exists for this?</b>	The Guidance will ensure larger room sizes and improved standards than those that have been provided to date in new housing. All people, including trans-gendered or transsexual people, will be able to make equal use of the policy.	
<b>14. Are there any <i>other</i> groups that would find it difficult to access/make use of the function (e.g. speakers of other languages; people with caring responsibilities or dependants; those with an offending past; or people living in rural areas)?</b>	<b>YES</b>	The document has only been produced in English. However, the Council can make it available in other languages if requested.
	<b>NO</b>	The document is available on the internet.
<b>What evidence exists for this?</b>	See above.	
<b>15. Are there concerns there <u>could</u> be a have a differential impact due to <i>multiple discriminations</i> (e.g. <u>disability and age</u>)?</b>		The Guidance applies universally to new housing in Medway. Those with disabilities and the elderly are key groups that stand to benefit from improved space standards and more flexible and adaptable housing but the benefits are universal – i.e. they will not have greater access to the benefits of these policies than others.
	<b>NO</b>	
<b>What evidence exists for this?</b>	Specialist housing providers have been consulted and have given their opinions on the guidance. The guidance is based in part on the well-known and respected Lifetime Homes standard that is specifically geared at meeting the existing and changing needs of 'diverse households'- including the needs of older and those with disabilities.	

<b>Conclusions &amp; recommendation</b>		
<b>16. Could the differential impacts identified in questions 7-15 amount to there being the potential for adverse impact?</b>		No differential impacts identified.
	<b>NO</b>	
<b>17. Can the adverse impact be justified on the grounds of promoting equality of opportunity for one group? Or another reason?</b>		No adverse impacts identified.
	<b>NO</b>	
Recommendation to proceed to a full impact assessment?		
<b>NO</b>	<b>This policy change complies with the requirements of the legislation and there is evidence to show this is the case.</b>	
<b>Action plan to make Minor modifications</b>		
<b>Outcome</b>	<b>Actions (with date of completion)</b>	<b>Officer responsible</b>
<b>Planning ahead: Reminders for the next review</b>		
<b>Date of next review</b>		
<b>Areas to check at next review (e.g. new census information, new legislation due)</b>		

<p>Is there <i>another</i> group (e.g. new communities) that is relevant and ought to be considered next time?</p>		
<p>Signed (completing officer/service manager)</p>	<p>Date</p>	
<p>Signed (service manager/Assistant Director)</p>	<p>Date</p>	



## Summary of respondent feedback on the Medway Housing Design Standards Consultation Draft

Note that this table does not include every comment but aims to summarise the main concerns raised, in most cases, by several respondents.

Topic	Comment	Medway Council response
General	Lodge Hill Design Code may depart from MHDS and the Medway Housing Design Standards (the Standards) should recognise this.	<u>Not agreed</u> : The Standards set a reasonable minimum standard that all developments should adhere to.
	Lack of consistency between Local Planning Authorities is inefficient and will adversely affect housing delivery in Medway.	<u>Not agreed</u> : The Medway Standards are pegged to the recent London Housing Design Guide. Other authorities in Kent are bringing in, or considering bringing in, their own standards. These too will be based on the London Guide. There will therefore be a degree of consistency across Kent and London.
	Too much design guidance leads to confusion not better design.	<u>Not agreed</u> : The standards set a minimum standard and are cross-referenced with other standards such as Lifetime Homes.
	Opposition to rigid standards that remove choice and variety for customers.	<u>Not agreed</u> : The standards set a minimum standard, below which space within dwellings will be cramped.
	Opposition to rigid standards that don't take account of local context.	<u>Not agreed</u> : The room space requirements that are at the core of the Standard do not vary from place to place. They are valid for Medway.
	London viability testing evidence does not apply in Medway.	<u>Agreed in part</u> : It is recognised that the viability gap in Medway may be wider than in many parts of London at the present time. However, the Impact Assessment carried out by Medway Council has revealed that the 'gap' between what developers have been providing in Medway and the proposed Standards is not as wide as many developers would believe. Additional flexibility has been built into the Medway Standards as an interim measure in order to assist with the viability of some sites and provide flexibility for sites which already have outline permission.
	Scepticism about imposition of standards in general at a time when government have delayed new HCA standards to help housing market recovery.	<u>Agreed in part</u> : Compliance with the HCA standards was estimated at around £10,000 additional cost per dwelling. This led the Government to abandon the HCA standards. The space requirements of the now abandoned HCA standards are very similar to those in the Medway Standards. However, the HCA were far more comprehensive and had a range of additional construction requirements. .  The Impact Assessment carried out by Medway Council has not been costed.

		However, it does reveal that in many cases recent developments would have complied, or come close to complying with the proposed Medway Standards. It is therefore not the case that the cost of implementing the Medway Standards will be as expensive as estimated for the HCA standards.
	Should not be implemented until Jan 2012 to enable gradual transition for major developments.	<u>Agreed in part:</u> The Medway Standards are to be introduced as an Interim Guide. This will allow for a period of testing and monitoring prior to formal adoption as an SPD following the adoption of the LDF in late 2012. Some flexibility has been built in for major developments which received outline planning permission prior to consultation on the Standards in November 2010.
<b>Status</b>	The standards are being established without an adequate parent policy. They should be guidance rather than policy until CS2/CS15 have been subject to independent examination and adopted (Sept 2012).	<u>Not agreed.</u> Policies S2 and BNE1, BNE2 and H6 provide baseline policies for the majority of the Standards.  However, the standards are issued as Interim Guidance pending final adoption of the LDF.
	They should be introduced as guidance as in London.	<u>Agreed:</u> see above
<b>Working with the standards</b>	Clarify how planners will determine where it is appropriate to allow flexibility. Must be consistent.	<u>Agreed:</u> the Standards have been revised to remove inconsistencies and to give clarity on flexibility.
<b>Required material and evidence</b>	Compliance cannot be demonstrated at outline and pre-app stage.	<u>Noted:</u> Full compliance cannot be demonstrated at outline stage. However, the Standards have been revised to suggest ways in which it can be demonstrated that proposed developments submitted for outline permission will comply with some aspects of the guidance and are likely, once developed in more detail, to comply with others.
<b>Summary table</b>	Ensure that this is always consistent with main text. Some of the detail is lost in summary.	<u>Noted:</u> inconsistencies have been removed. By definition the summary contains less detail. Reference to the main body of the text is recommended. A note has been added to this effect.
<b>Part 1</b>		
<b>Shared access and circulation</b>	Not always practical to achieve views out of corridors and double loaded corridors are unavoidable on higher density sites.	<u>Agreed in part:</u> Double loaded corridors have inherent disadvantages for residents. They are not encouraged. However, it is accepted that they are unavoidable on some higher density sites. Views out from corridors will result in relatively little 'take' from the space for flats. It is therefore not accepted that they are impractical.
	What constitutes a view and at what point is circulation space 'generous'?	<u>Noted:</u> The text has been altered to make it clear that a view out from a corridor is simply a window which provides daylight and ventilation. The width of circulation space is now defined.
	No. of dwellings per core is	<u>Agreed in part:</u> The number of dwellings that

	too limiting.	can be served from a single circulation core (lift and stairs) will have an important effect on the viability of a scheme. However, too many flats per core has important implications for security. The Standards have been amended to encourage a limit on the number of flats per core. Additional security measures provide an alternative to a restriction on flats per core.
	Not always practical or desirable for ground floor flats to have private on-street entrance.	<u>Agreed:</u> The standards have been revised to encourage separate ground floor entrances rather than requiring them.
<b>Management</b>	It is not practical or enforceable to include a management plan in a planning application. It would require a lot of time and effort from different council departments. What exactly is the LPA looking for here and is it a planning concern?	<u>Not agreed:</u> Maintenance is a crucial issue for big-flatted developments in particular if the developments are to be sustainable in the long term. A good management plan provides a good starting point. The contents of the plan are clearly specified in the document.  The principle and operation of maintenance plans to be agreed via planning system has long be established by standard conditions on the management of landscape.
<b>Car Parking, Cycle Storage and Utility</b>	This section needs more detailed explanation of requirements. It conflicts with other policies such as Secure By Design.	<u>Agreed:</u> This part of the standard has been revised to refer to other standards.
<b>Outdoor amenity space</b>	Proposed calculation questioned and alternatives proposed.	<u>Agreed:</u> see below
<b>Outdoor play space</b>	This is covered by Local Plan policies and repetition is unnecessary.	<u>Agreed:</u> the Standards have been revised to refer to Local Plan policy.
<b>Part 2</b>		
<b>Dwelling space standards.</b>	Internal floor areas proposed are too high for the price ceiling in Medway.	<u>Agreed in part:</u> The Medway Impact Analysis showed that the impact would be relatively little for most dwelling types. It is however accepted that some small house types would need a big increase in size in order to comply with the Standards and that this may well result in an increase in price. However, alternative methods of demonstrating adequate space are detailed in the Standards. Prior to the introduction of Lifetime Homes standards via the LDF in late 2012 these alternative methodologies are likely to result in dwelling sizes that are smaller than currently suggested in the Standards.
	GIFA must allow for a 2B3P house – unfair to 2 adult 1 child families in affordable housing.	<u>Not agreed:</u> 2B3P houses are highly unusual. In general it is more desirable to have flexibility for future residents by having additional space to accommodate a fourth person. It will not be acceptable for developers to promote 2B3P houses as a means of avoiding compliance with the standards. However, the Council will listen to

		any special case that is put forward for 2B3P houses as small component of larger developments.
	GIFA do not allow for studio/Manhattan flats.	<u>Agreed in part</u> : Studio flats are only suitable for a small proportion of residents. They do not have the same flexibility as larger 1-bed flats in meeting the needs of a number of lifestyles into the future. Nevertheless it is recognised that there is a niche market for studio flats. The Standards have been revised to allow for small proportion of studio flats within big developments.
	GIFA for houses are too high and inconsistent with affordable housing standards. Do not add up and need more work.	<u>Not agreed</u> : The Standards lay down space standards that are at the mid point of the current HCA Housing Quality Indicators. Use of the alternative methodology proposed in the revised Standards may result in dwellings being closer to the minimum HCA DQI.
	Should offer more flexibility in design terms.	<u>Agreed</u> : Flexibility has been built in a number of ways whilst retaining core standards.
<b>Private open space</b>	Balcony size standards too high/ cannot always apply.	<u>Agreed in part</u> : The balcony sizes are based on an ergonomic analysis of the space required for the likely uses of the outdoor space provided by the balconies. It is however recognised that it will not always be possible or desirable to provide a balcony. Alternatives are now suggested by the Standards.
	Garden size needs clarification/should be in sq.m. to allow for shallow sites.	<u>Not agreed</u> : Garden depth is a practical measure that is likely to lead to an adequate garden size in the majority of cases. In addition depth is retained in order to ensure a minimum separation between the rear of dwellings for amenity purposes.
<b>Visual Privacy</b>	Visual separation distance is too great and may lead to loss of units.	<u>Agreed in part</u> : separation of 20m between the rear of dwellings may be too great for high-density urban sites where it would be normal not to expect the degree of privacy that might reasonably be expected on suburban sites. Nevertheless separation between the facades of facing dwellings is an important part of residential amenity. An alternative methodology for dictating separation distances is therefore provided in the revised Standards.
<b>Floor to Ceiling Heights</b>	2.5m is too high. The accepted standard of 2.4 is more practical and adequate. Plasterboard sheets are 2.44m.	<u>Agreed in part</u> : Higher ceilings are desirable as a means of helping to ensure a greater sense of space and light. This is especially the case for single aspect dwellings. However, it is recognised that this standard will not always be appropriate. It is therefore encouraged rather than required.