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**Oxford City  
Council Local  
Plan 2036**

*Internal Space Standards,  
& Accessible and  
Adaptable Homes*

**BACKGROUND  
PAPER**

## **INTRODUCTION**

This paper sets out the justification for the adoption of the National internal space standards and the implementation of a specific policy with relation to accessible and adaptable homes. It comprises of an overview of the existing and emerging planning policy context and the building regulations framework. It presents a justification for the proposed policy approach using population and demographic to demonstrate that there is an appropriate level of existing and projected need to require the inclusion of this policy.

## **INTERNAL SPACE STANDARDS**

### **National Planning Policy Framework (2018)**

The NPPF states the Government's objective of significantly boosting the supply of homes and stresses the importance of bringing forward a sufficient amount and variety of land where needed (paragraph 59). Planning policies are required to go identify and cater for the variety of sizes, types and tenures of homes that are required for different groups within the community – including, among others, older people and people living with disabilities or mobility issues.

- The NPPF expects local authorities to require a high design standard in developments. It encourages clarity about design expectations (paragraph 124).
- The NPPF also requires that planning policies should ensure that developments should function well over the lifetime of the development as well as add to the overall quality of the area, and to contribute to the creation of safe, inclusive and accessible places with a high standard of amenity for existing and future users (paragraph 127).

### **Local Planning Context**

In 2013, the City Council adopted the Sites and Housing Plan<sup>1</sup>. This included policies HP12 – Indoor Space and HP2 – Accessible and Adaptable Space, which set minimum standards for the internal space required in new flats and houses. There is a requirement for adequate ceiling heights, sufficient space for circulation and use of household facilities, and the provision of adequate storage space, although these are not expressed as numerical figures.

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<sup>1</sup> Sites and Housing Plan 2011-26 (2013)

## **Policy HP12**

### **Indoor Space**

*Planning permission will only be granted for new dwellings that provide good-quality living accommodation for the intended use if:*

- a. each dwelling has its own lockable entrance, its own kitchen and at least one bathroom;*
- b. the space provided within each room allows for reasonable furnishing, circulation and use of household facilities in each part of the home, including for desk-based home working;*
- c. each dwelling provides adequate storage space, taking account of the occupation intended.*

*Planning permission will not be granted for new dwellings if:*

- d. any single dwelling provides less than 39m<sup>2</sup> of floorspace (measured internally), or*
- e. any single family dwelling provides less than 75m<sup>2</sup> floorspace (measured internally), or*
- f. inadequate ceiling height, lack of natural lighting or natural ventilation, or a restricted outlook prevents proper use and enjoyment of the dwelling.*

With the introduction of the new optional technical standards in March 2015, local authorities have the option to adopt these in addition to the minimum required by Building Regulations subject to appropriate justification based on local circumstances. While there were already established policy instruments in this area, the City Council from an early stage started to give weight to the national standards by producing a technical advice note on residential space standards<sup>2</sup>, which explicitly referred to the national standards and makes use of its definitions and terms of reference. .

### **Nationally Described Space Standards**

The national technical housing standards (published March 2015) were produced following a government review to replace the existing space standards in use by local authorities. The rationale is to simplify and rationalise the number of standards applicable to new homes, which could be complex, overlapping or contradictory. The new standards are not building regulations and are to be used solely within the planning system.

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<sup>2</sup> Planning Technical Advice Note: 1 – Space Standards for Residential Development (2016): [https://www.oxford.gov.uk/downloads/file/2562/technical\\_advice\\_note\\_1a\\_-\\_space\\_standards\\_for\\_residential\\_development](https://www.oxford.gov.uk/downloads/file/2562/technical_advice_note_1a_-_space_standards_for_residential_development)

**Table 1: Minimum gross internal floor areas and storage (Source: Technical housing standards DCLG 2015).**

<u>Number of bedrooms</u>	<u>Number of bedspaces (persons)</u>	<u>1 storey dwellings (m<sup>2</sup>)</u>	<u>2 storey dwellings (m<sup>2</sup>)</u>	<u>3 storey dwellings (m<sup>2</sup>)</u>	<u>Built in storage (m<sup>2</sup>)</u>
<b>1b</b>	1p	39(37*)			1.0
	2p	50	58		1.5
<b>2b</b>	3p	61	70		2.0
	4p	70	79		
<b>3b</b>	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
<b>4b</b>	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
<b>5b</b>	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
<b>6b</b>	7p	116	123	129	4.0
	8p	125	132	138	

\*Acceptable where a one person dwelling has a shower room instead of a bathroom

Nationally Described space standards are detailed and specific, setting out requirements for the Gross Internal (floor) Area of new dwellings at defined levels and types of occupancy. They also set out floor areas and dimensions for key parts of the home, notably bedrooms and storage.

### **Benchmark Studies**

Because the existing space standards policy has been implemented for some time, there are no examples of approved substandard dwellings coming forward, so there is no direct evidence from the city itself that a lack of policy would result in sub-standard dwellings coming forward. This does not preclude the need for including a robust policy in the emerging local plan that ensures national space standards are adhered to. To that end a number of examples from other local authorities to demonstrate the positive impacts that the integration of the national space standards within local policies.

### **Cambridge**

The Council undertook research on the unit sizes of a number of approved developments within Cambridge, in order to ascertain how the proposed standards were related to development being delivered in the city<sup>3</sup>. This formed part of the work in modifying their local plan policy for internal space standards to be in line with the nationally described

<sup>3</sup> Proposed modifications joint consultation report December 2016 (Cambridge/South Cambridgeshire) [https://www.scambs.gov.uk/media/3454/final\\_mods\\_consultation\\_document\\_website\\_81215.pdf](https://www.scambs.gov.uk/media/3454/final_mods_consultation_document_website_81215.pdf)

standards. Whilst the majority of the assessed schemes coming forward in the city were considered to meet or exceed the proposed standards, there was a number failing the standard.

This work has been updated to reflect the requirements of the Government's Optional Technical Standard. The Council has assessed a sample of planning applications approved since 2008 chosen on the basis of the number of bedrooms in order to allow assessment of a range of different unit types and bedrooms against the standard and on the basis of availability of full plans. The majority of applications assessed were submitted to the Council in 2009 – 2013. In some instances, where the number of bedrooms reaches 4 and 5 bed properties, there are less planning applications available to assess against the space standard.

The assessment revealed that a number of planning applications related to proposed development fell short of the National Standards across one, two, three and four bedroom units and this included both gross floor areas and storage provision. In some cases, the proposed dwellings were significantly below the requirements of the National Standards. The Council has therefore identified a pattern of applications which departs from the standard.

### *South Cambridgeshire*

The report centred on the assessment of schemes of two or more dwellings within the South Cambridgeshire district<sup>4</sup>. The study comprised of 115 new homes across 36 approved developments and involved the measurement of the gross internal area, bedroom sizes, built in storage and ceiling heights.

The overall results of the study indicated that while majority of the assessed new homes met or exceeded the national space standards in terms of gross internal area, 24% of all dwellings had a gross internal area below the national standard and 40% had a double (or twin) bedroom smaller than the national standard. The majority of new homes did not meet the national space standards with respect to the floor space of single bedrooms (54%) and built-in storage requirements (55%). The study also reports that a higher percentage of affordable dwellings than market dwellings do not meet the national standards. The reason cited was the higher minimums required for GIA and bedroom sizes in the national space standards than for the Homes and Community Agency standard that previously applied to affordable dwellings. The level of non-compliance, particularly with respect to the quality of specific internal spaces, demonstrates the need for the implementation of a policy that requires all new homes to meet national space standards.

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<sup>4</sup> Evidence for residential space standards in South Cambridgeshire – South Cambridgeshire District Council, September 2016

## **Milton Keynes**

The Council carried out a study following the publication of the national standards to determine the necessity to include them as part of local policies. The study<sup>5</sup> comprised of 256 new dwellings of different types (ranging between 2 to 5 bedroom houses, and one and two bedroom flats) chosen to represent current and future development patterns within the council administrative area. The majority of new homes did not meet the national space standards with respect to the floor space of single bedrooms (51%). Of the 673 bedrooms assessed, 46% fell below the national standards.

The study also assessed the standards of affordable homes. In the Milton Keynes context, the need is dominated by 2 and 3 bedroom houses. These homes were found to be the worst performing in terms of meeting the standards, with 81% of 2 bed roomed houses and 64% of 3 bed roomed houses falling short. With respect to bedroom sizes, 52% of the 2 bed units were below target and 67% of 3 beds were below target. Prior to the Housing standards review, the council did not have any local standards on the internal spaces of new dwellings with the exception of housing quality indicators that are required as part of affordable housing delivered under the Homes and Communities Agencies funding programmes in the borough.

### **Drafting the Local Plan Policy**

The draft Plan contains the following policy:

#### ***Policy H15: Internal Space Standards***

*Planning permission will only be granted for new dwellings that provide good quality living accommodation for the intended use. All proposals for new build market and affordable homes (across all tenures) must comply with the MHCLG's Technical Housing Standards – Nationally Described Space Standard Level 1.*

*The standards for bedroom sizes and dimensions will be applied to new-build HMOs and other communal accommodation including extra care housing and student accommodation.*

*For properties converted to HMO, bedroom sizes should be in accordance with the Government's mandatory minimum room sizes for licensed HMO.*

One of the benefits of maintaining a minimum space standard is that it ensures that living spaces are of a reasonable size that is not cramped or claustrophobic; allows for a level of flexibility in terms of use (e.g. storage, separate rooms for socialising, privacy); and gives some allowance for household growth.

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<sup>5</sup> Nationally Described Space Standards Study – Milton Keynes Council (August 2017)

Making reference to the national standards will ensure the creation of housing with adequate space for occupants, functional layouts and scope for adaptation and modification. It would also codify existing practice which is already based on those standards, provide clear definitions and points of reference, and remove any trace of ambiguity in interpreting spatial requirements.

As written the proposed policy in the emerging Local Plan will largely be a formalisation of existing practice and will facilitate and improve the development management decision making process. Assessment of the effectiveness of the space requirement policy was only carried out in earnest in the 2014/15 monitoring. It nevertheless demonstrated through the use of random sampling of completed residential developments that all were in compliance with the policy as written.<sup>6</sup> While the existing policy has shown signs of being successful, its requirements were based on local and not on a is not pegged to a definitive standard, which can potentially leave it open to ambiguous interpretation depending on the context. Pressure to deliver new homes or make efficient use of land can lead to prioritisation of delivering high volumes within short timescales to the detriment of creating pleasant and useful living spaces for residents. There are also no identified local circumstances that would justify why the national space standards could not be implemented on new developments.

### **Potential Impact of Policy on Development Viability**

The viability assessment comprises, among other elements, of the appraisal of a number of development scenarios that are based on a number of assumptions, including dwelling sizes, residential sales, and development costs. The assumptions for dwelling sizes made use of floor areas that are in line with the National space standards as well as market expectations. The baseline assumption for affordable housing provision was at the minimum standard for each of the housing types, while for private provision the baseline exceeded the minimum standards. It is therefore not expected that the implementation of the policy will create an additional burden on developers.

### **Policy Implementation Timing**

The Current Local Plan Policy and Technical Advice note have been implemented since 2016. Internal space standards as outlined in policies already make direct references to the National Standards, and have been material considerations for planning decisions new dwellings since implementation. The proposed policies expands on these standards with no drastically new requirements, therefore it is not expected that transitional provisions will be necessary.

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<sup>6</sup> Annual monitoring report 2014/15 (p28)

## ACCESSIBLE AND ADAPTABLE HOUSING

### Building Regulations Framework

The minimum standards for accessibility are as set by Building Regulations, which Local Authorities have the option to exceed subject to evidence that this is required for their local area. The new approach introduces optional building regulations requirements for access and water efficiency which provide a higher standard than the minimum national building regulations.

Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings.

Approved Document M (volume 1) explains that requirement M4(1) [Category 1] will be met when a new dwelling makes reasonable provision for most people, including wheelchair users, to approach and enter the dwelling and to access habitable rooms and sanitary facilities on the entrance storey". Specific features include level access between ground floor habitable rooms and the toilet, and wall-mounted switches and sockets outlets, in habitable rooms, that are "reasonably accessible to people who have reduced reach"<sup>7</sup>.

The Lifetime Homes standard has been superseded by national technical housing standards; local authorities can provide accessibility through M4 (2) [Category 2], and/or M4 (3) [Category 3]. The Category 2 requirements are comparable in broad terms to the design criteria as outlined in the Lifetime Homes standards<sup>8</sup>.

Where enhanced requirements are to be implemented, they are only to be in reference to Requirement M4 (2) and/or M4 (3) of the optional requirements in the Building Regulations. Categories 2 and 3 (M4 (2) and M4(3)) are optional standards which apply only where a local authority, through its local planning policies, "has determined that higher standards can be justified on the basis of need and provided the viability of development is not compromised." Local Plan policies for wheelchair accessible homes (Category 3) should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

Local Plan policies are also expected to take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step

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<sup>7</sup> Approved Document M: Access to and use of buildings, volume 1: dwellings (March 2015)

<sup>8</sup> Accessible Housing standards 2015 – Briefing (June 2016): <http://www.lifetimehomes.org.uk/pages/lifetime-homes-and-part-m.html> (accessed June 2018)

free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied.

### Local Planning Context

Policy HP12 of the Sites and Housing Policies Plan comprises of minimum requirements for the quality of indoor living accommodation for new dwellings. Regarding liveable spaces, the policy requires the provision of no less than 39m<sup>2</sup> for single dwellings and 75m<sup>2</sup> for (single) family dwellings. Policy HP2 requires new dwellings to meet the Lifetime Homes standard, and for sites comprising of 4 or more dwellings at least 5% of all new dwellings (or at least 1 dwelling for sites below 20 units) are either fully wheelchair accessible, or easily adapted for full wheelchair use. 50% of these must be provided as open market dwellings.

### **P o l i c y   H P 2**

#### *Accessible and Adaptable Homes*

*Planning permission will only be granted for new dwellings where*

- a. all the proposed new dwellings meet the Lifetime Homes standard, and*
- b. on sites of 4 or more dwellings (gross), at least 5% of all new dwellings (or at least 1 dwelling for sites below 20 units) are either fully wheelchair accessible, or easily adapted for full wheelchair use. 50% of these must be provided as open market dwellings.*

*The City Council will take into account any evidence that applying these requirements would make the development unviable.*

### Demographics and Projected Need – Aging Population

There is a range of data available that builds a demographic profile of the population of Oxford, with respect to age, economic activity and disability status. From this it is possible to form a picture of the proportion of residents who could potentially benefit from the provision of residential accommodation that is adapted to allow for as much independence as possible, even if they are not necessarily disabled. While the data is not always precise with respect to the form of disability, the aggregate allows for a reasonable estimation as to the level of infirmity and by extension what level of adaptation may be required.

Oxford has a relatively young population (within the 0 – 29 age range) compared to neighbouring districts and the UK, mainly because of the large number of students. The population is forecast to grow at a sustained pace over the next few years. It is expected that the trend of Oxford having a younger population than average is set to continue; however with people living longer the number of older residents will increase, as would the proportion among the city population. Accordingly their needs with respect to housing

and the provision of suitably adapted spaces are expected to grow. A suitable policy will be required to ensure that sufficient provision is made to accommodate this need.

**Table 2: 2016 Snapshot of Comparative Age distribution of population**

<b>City</b>	<b>% Population Aged 0-17 (2016)</b>	<b>% Population Aged 18-29 (2016)</b>	<b>% Population Aged 65+ (2016)</b>
Oxford	18.79	31.07	11.43
Brighton	18.17	21.61	15.06
Cambridge	17.52	30.32	12.01
London	22.6	17.45	12.31
Milton Keynes	25.39	13.27	13.1
Norwich	18.6	18.71	19.69
Nottingham	20.2	21.42	16.05
Swindon	22.7	13.68	15.48

(Source: Centre for Cities)

**Table 3: Oxford Housing led population forecast in 5 year bands**

<b>Year</b>	<b>65-69</b>	<b>70-74</b>	<b>75-79</b>	<b>80-84</b>	<b>85-89</b>	<b>90+</b>	<b>Totals</b>	<b>% of city population</b>
2016	5500	4300	3200	2600	1700	1200	18500	11%
2021	5400	5000	3800	2700	1800	1200	19900	12%
2026	5900	5000	4500	3200	1900	1300	21800	13%
2031	6800	5400	4400	3700	2200	1400	23900	14%
2036	6500	6200	4800	3600	2600	1500	25200	15%

(Source: Oxfordshire Insight: <https://insight.oxfordshire.gov.uk/cms/revised-occ-5-year-age-bands-district-level-housing-led-forecasts-apr18>)

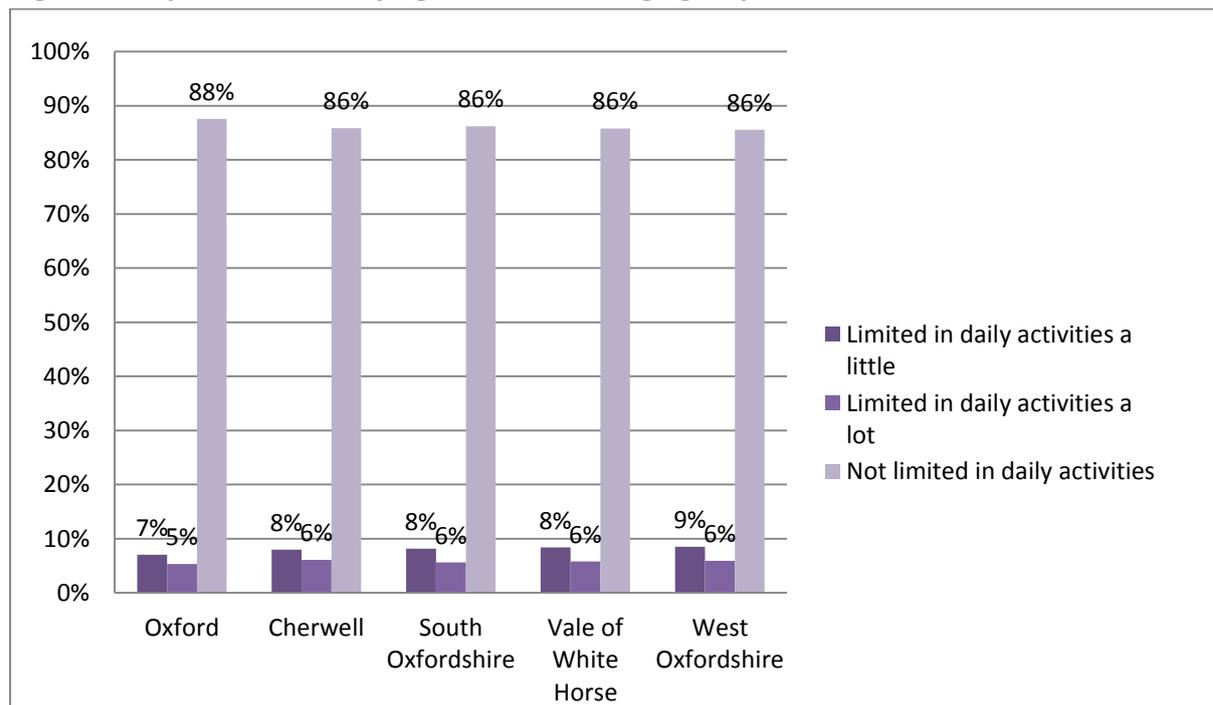
### **Demographics and Projected Need – Disability**

The available data covers the entire age range, but is not always precise with respect to the details of the nature of infirmities; however, it does indicate that there is a section of the population that may have some restriction in their daily activities but still have the capacity to live independently. Many people with disabilities are likely to want to live in their own homes, rather than in institutions. People who are disabled often end up being the most likely to depend on affordable housing<sup>9</sup>. Such properties are likely to require adaptations in some instances, whilst other households may require more specialist housing designed to meet their needs, thus ensuring that a choice of suitable housing (including in a range of tenures and a greater range of self-contained dwellings) will continue to be important to meeting the needs of households with disabilities.

<sup>9</sup> Housing and disabled: Britain’s hidden crisis - EHRC, May 2018 (<https://www.equalityhumanrights.com/sites/default/files/housing-and-disabled-people-britains-hidden-crisis-main-report.pdf>)

The data on disability indicates that the need is present across all age groups, with 12.4% of the total resident population directly affected by disability. Proportionally residents aged 65 years or older are more affected, with half of the population cohort reporting at least some level of limitation in carrying out daily activities. If the assumption is made that the proportion remains constant, an extrapolation will indicate that there will be an increase in the absolute numbers of city residents that will have some level of restriction on their daily activities.

**Figure 1: Reported Disability figures across all age groups**



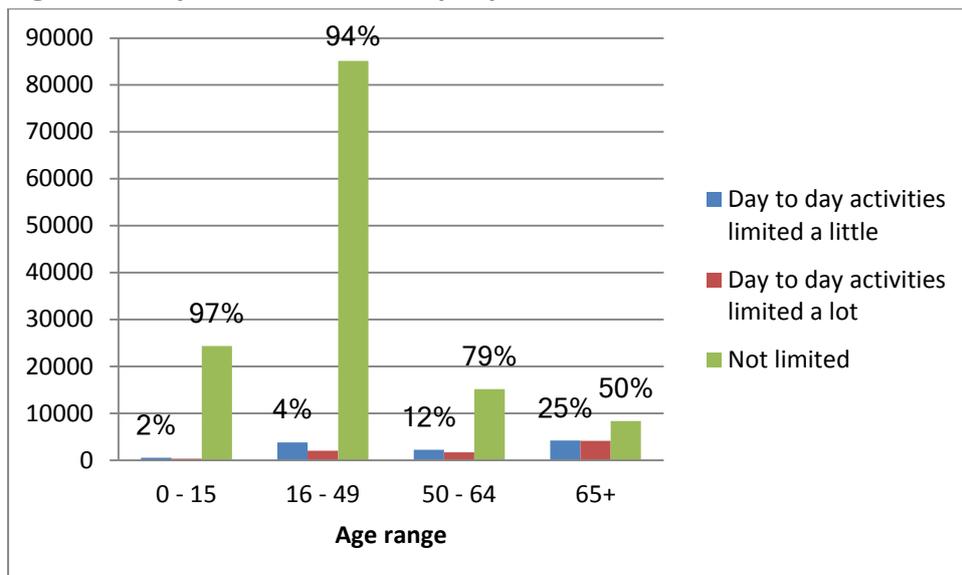
(Source: Census 2011)

**Table 4: Oxford Disability figures by age group**

Age	Day to day activities limited a little	Day to day activities limited a lot	Not limited
0 - 15	512	302	24367
16 - 49	3798	2024	85164
50 - 64	2219	1700	15180
65+	4183	4113	8344
S/Total	10712	8139	133055

(Source: Census 2011)

**Figure 2: Proportion of disabled people in Oxford**



(Source: Census 2011)

### Existing Housing Stock and Estimated Needs

The *English Housing Survey Profile of English housing 2014-15* (EHS) was commissioned by the then Department for Communities and Local Government (CLG) and assesses housing conditions and housing circumstances in England. The *Adaptations and Accessibility of Homes Report*<sup>10</sup> is one of the suite of reports comprising the EHS and it evaluates the accessibility of dwellings and disability adaptations. Visitability of dwellings is based on four key features which form the basis for the requirements in Part M of the Building Regulations, which are:

- Level access;
- Flush threshold;
- Sufficiently wide doors and circulation space;
- WC at entrance level.

The visitability standards in the EHS do not replicate exactly the more detailed standards in Part M4 of the Building Regulations, but they are useful in providing an indication of what key features are required for making a dwelling accessible.

**Table 5: Estimates of level of work required to make homes fully visitable**

Proportion of all homes not already fully visitable	Description of works required to make home visitable
11.9%	Minor work
45.1%	Moderate work
15.3%	Major work/problematic

<sup>10</sup> Adaptations and Accessibility of Homes report – DCLG 2016  
 ([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/539541/Adaptations\\_and\\_Accessibility\\_Report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/539541/Adaptations_and_Accessibility_Report.pdf))

27.7%	Not feasible to make fully visitable
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Source: Annex Table 2.3: Level of work required to make homes 'visitable', by dwelling characteristics, DCLG 2016

**Table 6: Estimates of levels of work by housing tenure**

Description of works required to make home visitable	Private sector (owner occupied)	Private sector (rented)	Local authority	Housing associations (PRP)
Minor work	13.5	8.8	8.3	9.9
Moderate work	49.3	33.6	42.1	42.1
Major work/problematic	12.2	19.3	26.6	20.2
Not feasible to make fully visitable	25	38.3	22.9	27.8

Source: Annex Table 2.3: Level of work required to make homes 'visitable', by dwelling characteristics, DCLG 2016

A cross sectional study was carried out as part of the accessibility report to estimate the level of visitability of dwellings in England. Several factors were taken into account, including the type of building, tenure and cost of adaptation. The most important finding is that the vast majority (97%) of homes are not fully visitable to all occupants and visitors, including wheelchair users. However the results demonstrate that for majority of the dwellings it is feasible to at the least improve the level to all users and visitors without exorbitant cost. The most common interventions were determined to be within dwellings and relatively simple to install.<sup>11</sup> Two key factors identified as impacting on visitability were the design and the age of the home, with flats and newer properties most likely to be fully visitable. The potential impact of the coming into force in 1999 of part M building regulations was also recognised, with the data indicating that dwellings built from 2001 onwards were more likely to have more than one visitability feature than older homes. Proportionally private sector dwellings were more likely to require interventions, presumably due to the fact that these were more likely to be composed of older, less adaptable stock such as terraced or semidetached buildings.

Arriving at an accurate actual figure for the potential deficit of accessible and adaptable dwellings in Oxford would be difficult, so for the purposes of this paper the national percentages will be applied to the number of households in Oxford to arrive at an indicative working figure. Notwithstanding the estimates, there is an established need for accessible dwellings and a consistent demand for works to make existing dwellings adapted to user needs.

<sup>11</sup> DCLG 2016: pp 1-3)

**Table 7: EHS estimates applied to Oxford dwellings**

Description of works	Number of households
<i>Minor work</i>	6988
<i>Moderate work</i>	26483
<i>Major works</i>	8984
<i>Not feasible to make fully visitable</i>	16265

(Estimates based on MHCLG 2017 figures)

**Table 8a: Oxford housing stock by tenure**

Tenure	Percentage	Numbers
Owner occupied	47%	27598
Private rented	28%	16445
Local authority rented	8%	4698
RSL (Housing association etc.)	14%	8221

(Source: percentages based on ONS census data 2011)

**Table 8b: EHS estimates applied to Oxford by housing tenure**

Description of works required to make home visitable	Private sector (owner occupied)	Private sector (rented)	Local authority	Housing associations (RSLs)
<i>Minor work</i>	3726	1447	390	814
<i>Moderate work</i>	13606	5526	1978	3461
<i>Major work/problematic</i>	3367	3174	1250	1661
<i>Not feasible to make fully visitable</i>	6896	6298	1076	2285

The tendency is for local authorities and health authorities to bear much of the cost of adapting housing and re-housing people who are disabled. An indicator is the issuing of Disabled Facilities grants, provided for people who are disabled and need to make changes to their homes. The figures show that the clear majority of such applications come from people in social rented accommodation.

**Table 9: Applications for Disabled Facilities Grants Jan to Dec 2017**

	Cherwell	Oxford City	South Oxon	Vale of WH	West Oxon	Not Recorded	Un-known	TOTAL	
Owner Occupier	89	4	62	38	53	164	13	423	36%
Private	9	1	2	8	5	16	1	42	4%

Rented									
Social rented	88	178	93	76	62	180	20	697	59%
Not recorded	4	1	5	4	1	13	1	29	2%
Total	190	184	162	126	121	373	35	1,191	100%

(Source: Oxfordshire Insight JSNA 2018 c:7 <http://insight.oxfordshire.gov.uk/cms/joint-strategic-needs-assessment>)

In the previous quarter in 2018, the councils Home Improvement Agency received 100 requests for accessibility adaptations, comprising of 53 Disabled Fund Grants and 47 minor works. These are received at a comparable rate per quarter so an estimated 400 of such requests are received annually<sup>12</sup>.

### Drafting the Local Plan Policy

The draft local plan contains the following policy:

#### **Policy H10: Accessible and Adaptable Homes**

*Proposals for residential development should ensure that all affordable dwellings and 15% of general market dwellings are constructed to the Category 2 standard as set out in the Building Regulations Approved Document M4. 5% of all dwellings on all sites of 4 or more dwellings should be provided to Category 3 standards (or at least 1 dwelling for sites below 20 units).*

The existing policy also requires 15% of new dwellings on suitable sites to be constructed to the now superseded Lifetimes Homes standard, and the proposed policy recommends a similar level of provision at Category 2 standard (comparable to the old Lifetime Homes standard). Specifying a level of provision that at least closely matches the proportion of the total resident population that is in need will be a reasonable approach to quantify. The proportion required is slightly higher than the 12.4% of the resident population affected by disability in anticipation of the expected demographic changes that mean there will be a higher proportion of people in the oldest age ranges. The 5% requirement for dwellings to meet Category 3 standards reflects the 5% of the resident population that are significantly limited in their daily activities.

The housing need in Oxford is acute, with available affordable housing particularly at a premium. The pressure to deliver sufficient housing volumes in the shortest possible timeframe can lead to compromises in quality and usability of accommodation. Without a specific policy there will be no clear instrument to prevent the undue restriction in the types and location of housing that is suited to people with mobility needs, including

<sup>12</sup> Oxford Home Improvement Agency

disabled people and people who are elderly. There is a possibility of consolidation of living spaces in specific places and could effectively result in spatial segregation of people and communities. Integrating the principles at design stage will be a more efficient and cost-effective means of ensuring that suitable homes are delivered. This approach meets the requirements of Section 149 of the Equality Act 2010 which requires public bodies (including local authorities) to have 'due regard' to the need to promote equality of opportunity for disabled people.