



Topic Paper

Residential Development Space and Accessibility Requirements

Supporting Document for the Hastings Local Plan Draft Local Plan Preferred Options (Regulation 18) February 2026

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Executive Summary

This Topic Paper sets out the justification for incorporating both the Nationally Described Space Standards (NDSS) and the enhanced accessibility requirements of Building Regulations M4(2) and M4(3) within Policy SC2 of the emerging Local Plan. The evidence demonstrates a clear local need for new homes to provide sufficient internal space, improved accessibility, and adaptability for a population with diverse and changing needs. It also confirms that these requirements are viable and already well understood by developers operating within Hastings.

Hastings faces significant housing challenges, including an unusually high proportion of converted flats, an oversupply of small and poor-quality accommodation, and persistent socio-economic deprivation. Many homes in the town do not provide adequate space for households to live comfortably, with new developments sometimes presenting undersized bedrooms, poor circulation, and layouts that restrict family life, children’s study space, and future adaptability. The NDSS provides a nationally recognised benchmark for ensuring that new homes offer sufficient and functional internal space, enabling residents to enjoy healthier living environments and supporting long-term occupation throughout different stages of life.

Alongside space standards, there is a strong and growing need for homes that are accessible and adaptable. Hastings has an ageing population, with the proportion of older residents projected to increase significantly over the coming decades. At the same time, national data shows a shortage of dwellings that meet even basic accessibility requirements, with only seven per cent of existing homes meeting these standards. Local and county-level health and social care strategies highlight the importance of enabling residents to remain independent for as long as possible, and the Council’s commitment to becoming an Age Friendly Community reinforces the need for homes that can support older people, wheelchair users, and those with limited mobility. Incorporating M4(2) and M4(3) ensures that new dwellings are designed to offer step-free access, suitable circulation spaces, and the structural capability for future adaptations, with a proportion of affordable homes built specifically to wheelchair-user standards where needed.

The Whole Plan Viability Assessment confirms that requiring all new homes to meet the NDSS and requiring ten per cent of affordable homes to meet M4(2) or M4(3) is viable across the borough. These requirements have also effectively been in place for many years

through adopted policies DM3 and DM4, which already expect new homes and conversions to comply with minimum space and accessibility standards. As a result, the development industry in Hastings is well accustomed to these expectations, and no transitional period is necessary.

Overall, the inclusion of the Nationally Described Space Standards and the M4(2)/M4(3) accessibility standards within Policy SC2 is justified by strong evidence of local need, proven viability, and alignment with national planning policy. Together, these measures will improve the quality, functionality, and inclusiveness of new housing, ensuring that future homes in Hastings are suitable for families, older residents, people with disabilities, and the wider community. The policy will contribute to a more balanced, resilient, and sustainable housing market, delivering homes that support wellbeing and remain fit for purpose over the long term.

1.0 Introduction

1.1 The purpose of this Topic Paper is to provide background information on the introduction of the government's Nationally Described Space Standards and the enhanced optional standards for accessible and adaptable housing in the Draft Local Plan – Preferred Options (Regulation 18) February 2026. The proposed standards set out in Policy SC2: Design – Housing Mix, Accessibility and Adaptability complement objective 3 Delivering at least 2,757 new homes that people can afford and want in well-designed existing, or new neighbourhoods that make it easier to lead a more active lifestyle.

1.2 This Topic Paper demonstrates evidence of need for the optional technical standards relating to

- (i) space standards and
- (ii) accessible and adaptable homes in Hastings Borough

and that the introduction of these enhanced optional standards will not significantly impact on development viability.

2.0 Policy Context

2.1 Paragraph 63 of the National Planning Policy Framework (NPPF) sets out that Local Planning Authorities (LPAs) should seek to ensure that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

2.2 In 2015 the Government introduced the Nationally Described Space Standard (NDSS), following on from the Housing Standards Review. Whilst the majority of the recommendations of the Review were incorporated into Building Regulations, the space and enhanced accessibility standards were treated as optional standards that Local Planning Authorities can adopt through their Local Plan where there is a demonstrated local need.

2.3 The National Planning Practice Guidance (PPG) sets out that where a local planning authority seeks to introduce an internal space standard in accordance with the NPPF, they should only do so by reference to the Nationally Described Space Standards. LPAs will however need to gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local Plans.

2.4 Local Policy

Adopted Hastings Planning Strategy (2014)¹

SC1: Overall Strategy for Managing Change in a Sustainable Way,

H2: Housing Mix, and,

Adopted Hastings Development Management Plan (September 2015)²

Policy DM3 - General Amenity

All require high quality housing which will meet the needs of Hastings residents. Policy H2 states that developments should take account of existing local household characteristics and

¹ [Hastings Planning Strategy: Adopted February 2014, Hastings Borough Council, 2014](#)

² [Development Management Plan: Adopted September 2015, Hastings Borough Council, 2015](#)

whether there is a bias towards younger or older households, families or sharers and how the new development will fit into this context.

Adopted Policy SC1 states that development will be managed so that it improves the quality of the natural environment, supports the diverse needs of communities and provides vibrant, safe, healthy and inclusive places where existing and future residents want to live and work.

Adopted Policy DM3 requires dwellings to be built within the nationally described space standards and states that dwellings should be designed to allow residents to live comfortably and conveniently with sufficient internal space. The guidelines for minimum internal floor areas are: 1 bedroom/2 person 51m²; 2 bedroom/3 person 66m²; 2 bedroom/4 person 77m²; 3 bedroom/5 person 93m²; 4 bedroom/6 person

2.5 Proposed Policy SC2: Design – Housing Mix, Accessibility and Adaptability in the draft version of the Local Plan introduces the following policy requirements relating to residential space and accessibility standards: Development should provide adequate indoor and outdoor space for occupants. Proposals for new residential development will be required to meet the national Space Standards, or any successor, to assess provision and will normally seek a minimum home size as set out in table 1.

Table 1 – Nationally Described Space Standards

Table 1 - Minimum gross internal floor areas and storage (m²)

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

3.0 Space Standards Evidence

3.1 The NPPG states that in order to require the use of the space standard, the LPA should take account of three broad criteria:

Need – based on evidence of the size and type of dwellings currently being built in the area in order to ensure that the impacts of adopting the standard are properly assessed.

Viability – looking at the potential impact of adoption on housing supply and affordability and;

Timing – whether there should be a transition period following adoption of a policy to enable the impacts to be factored into future land acquisitions.

4.0 Need

4.1 It should be noted that the Council has been applying the Nationally Described Space Standards to proposals for residential conversions since their introduction in 2015. There is no difficulty being associated with delivering space standards in planning applications, or that applying the space standards has reduced the number of residential conversion applications being submitted. In order to provide the high quality homes that Hastings needs and to assist in re-balancing the housing market which is skewed towards small, poor quality and over-crowded housing or housing that is no longer fit for its occupants which are aging or have special circumstances, it is important that new build dwellings meet the same Nationally Described Space Standards and are accessible, wherever possible.

4.2 The section below considers the implications of applying the Nationally Described Space Standards against the three criteria set out in the National Planning Practice Guidance.

The need for new homes to meet the Nationally Described Space Standards

4.3 In recent years there has been growing public concern nationally about the quality of new homes. As house prices have increased, alongside a relative lack of choice for homebuyers in the light of intense competition for new homes, there has been concern that developers have been reducing dwellings sizes in order to maximise value. In response to these concerns, the Nationally Described Space Standards were introduced in 2015. Whilst the needs of families will vary significantly, the Nationally Described Space Standards represent a benchmark for all new dwellings across the country and across tenures, which balances being achievable and ensuring adequate space. The National Planning Practice Guidance makes clear it is the only standard that local planning authorities should use.

4.4 When buying a new home, space is one of the most important factors to consider. A study by Shelter in 2013 identified that 44% of the public would be more likely to support the building of new housing if homes were larger. Research by YouGov in 2010 also identified that 42% of people put the size of rooms as the most important factor when buying a new home. There is a clear perception that new homes are being built with rooms that are too small and this was the main reason (60%) why people are unwilling to choose a new home built in the last 10 years.

4.5 The Nationally Described Space Standards set out minimum gross internal floor areas and associated requirements, including for storage and takes into account commonly required furniture and the spaces needed for different activities and moving around.

4.6 Hastings has one of the country's greatest concentrations of socio-economic deprivation and a unique and extreme set of housing challenges. This challenging housing market is evidenced in the East Sussex in Figures 2024, the Housing Economic Development Needs Assessment (HEDNA) and the Hastings Borough Council: Private Sector Stock Condition Survey 2023.

4.7 Hastings is characterised by an oversupply of poor quality one-bedroom accommodation, limited choice of family housing particularly in the Inner Area, and a shortage of good quality affordable housing across the town with the highest proportion of any housing type being flats or maisonettes (36.2% as of 2021 compared to England

average of 22.2%) and 14% of Housing being Social/Affordable rent as set out in the Hastings Borough Council: Private Sector Stock Condition Survey 2023. The percentage of affordable housing has been slowly declining since 1981 when 20% of the housing stock was affordable rent and the private rental sector has increased from 22% to 29% 2021. Private home ownership has also declined in this time from its peak in 1991 at 69% to 57% in 2021. Finally, the percentage of purpose built flats in Hastings was significantly below the England (76.4%) and South East (78.1%) averages at 55.6%, with the percentage of conversions being 36.3%. Therefore, given the lack of purpose-built flats within Hastings the application of minimum space standards to new purpose built flats and conversions in order to ensure a good standard of living for future occupants of those flats is considered to be important in order to compensate for the existing poor quality of converted flats in the borough.

4.8 The challenges faced by Hastings' economy are closely related to the health of its population and the association between low income, poverty, deprivation, living environment and poor mental and/or physical health is well established and the need for good quality new homes is evidenced by the decline in the private home ownership sector.

4.9 Whilst it is acknowledged that not all conversions offer poor quality housing, a review by the UCL Bartlett School of Planning commented on the negative health impacts of poor standard conversions which do not conform to space standards in their paper "Permitted development, housing and health: a review of national policy and regulations". The existence of poor quality conversions of buildings to residential dwellings, the prevalence of this type of accommodation within Hastings and the noted levels of deprivation within Hastings limiting people's accommodation options, is a major concern. Therefore, establishing a better housing offer in Hastings through the development of new homes and conversions which are suitable for the needs health conditions of their occupants is especially important to the economic prosperity in Hastings given the poor degree of housing choice, especially for families.

4.10 In some of the housing developments in Hastings, the bedroom sizes in some standard house types result in three bed homes without an adequately sized double bedroom and/or single bedrooms unsuitable for a full-size single bed and other furniture or space to play or study.

4.11 Using the minimum bedroom sizes in the Nationally Described Space Standards, some standard house types in Hastings would provide a 3-bedroom dwelling only suitable for 2 people as only 2 of the bedrooms meets the minimum floorspace standards for single bedrooms. This is concerning given the ongoing trend of older children living at home well into their adulthood as a study by Loughborough University for the Standard Life Foundation in 2020 found that 71% of adults in their early 20's, 54% of adults in their late 20's and 33% in their early 30's are living in their parents' home. Therefore, within the proposed policy SC2 there is a requirement for any office or study rooms proposed within a dwelling to comply with the internal floor area requirements set out in the L24: Workplace Health, Safety and Welfare Regulations 1992: Approved Code of Practice, to ensure that these are not being misnamed within planning submissions to circumvent the national described space standards.

4.12 New homes should have adequately sized rooms and efficient room layouts which are functional and fit for purpose to meet the changing needs of occupiers. To ensure that new build housing development is of a good quality and suitable for all types of families at any stage in their lives, there is a clear need for new build dwellings to meet the Nationally Described Space Standards or any future successor.

4.13 The need for accessible and adaptable homes

4.14 The National Planning Policy Framework is clear that local planning authorities should plan to create safe, accessible environments and promote inclusion and community cohesion. This includes buildings and their surrounding spaces. Local planning authorities should take account of evidence that demonstrates a clear need for housing for people with specific housing needs and plan to meet this need.

4.15 Based on the housing needs assessment and other available datasets, the National Planning Policy Framework states that it will be for local planning authorities to set out how they intend to approach demonstrating the need for M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations.

4.16 Older people have specific accommodation needs, for example, a home free from hazards to prevent falls, or that is wheelchair-accessible, or that is single storey to improve mobility. Older people need housing that is easy to heat and is well-insulated. “Fuel poverty” is defined as where an unacceptably high proportion of income (10% of income according to the charity National Energy Action) needs to be spent on heating. The 2021 Annual Fuel Poverty Statistics show that since 2013 the proportion of households aged 75 and over in fuel poverty has been increasing.

4.17 The proportion of those aged 65 and over in the UK was 18% in 2016 and is expected to rise steadily to around 26% by 2066 according to the Office For National Statistics - Living Longer 2018. Hastings has a higher than average number of residents within retirement age at 24% in 2011 and local projections indicate that 30% of the population will be of retirement age in Hastings by 2028 – Hastings and St Leonards Housing Strategy 2016–2019. Yet only 7% of existing homes in the UK currently meet basic accessibility requirements for the elderly – UK Parliament, Housing: Accessibility Standards, 2024. The number of people aged 85 and over will more than double in the UK in the next 25 years, with forecasts suggesting that nearly 90% of local authorities are each likely to require at least 1,000 additional specialist dwellings by 2035 according to the Office For National Statistics ([Not enough homes being built for older people – new research](#)).

4.18 Hastings Borough Council in 2021 signed up to the Age Friendly Communities Pledge which seeks to create an Age Friendly Communities to ensure residents can live well as they move into older age in Hastings. An Age Friendly Community is a place that enables people to age well and live a good later life. Somewhere that people can stay living in their homes, participate in the activities they value, and contribute to their communities, for as long as possible. The WHO Age Friendly Communities framework acts as an evidence-based guide to support communities to reach this goal. It was developed in consultation with older people across the world and is built on the evidence of what supports healthy and active ageing in a place. The Age Friendly Communities framework sets out that for housing this means a home is designed with age-friendly features, such as elevators, wide passages to accommodate wheelchairs, etc, allows older residents to live comfortably. Therefore, the requirement for accessible homes supports the Council’s Age Friendly Communities Pledge and the ambitions therein.

4.19 Hastings Council’s 2016-2019 Housing Strategy states that Hastings Borough Council, East Sussex County Council and partners have identified a need to develop further social care and housing options for older people. The Council respects people’s wishes to remain independent for as long as possible and are keen to develop support models to help people as they move from one life stage to another. The requirement for new developments to include accessible homes would represent a proactive approach to allowing older residents to remain independent by providing housing that could support people throughout different

stages of life. It is worth noting that the Council's new housing strategy is currently being produced and is expected to be adopted by 2026.

4.20 East Sussex County Council Adult Social Care Strategy 2023-2028 states that it is essential to plan now so that the housing stock in East Sussex can meet future demand. The strategy sets out 6 key priorities for adult social care that will support ageing well three of which relates directly to housing, which are: Right support, right place, right time; Cost of living and cost of care, now and in the future; and, a suitable home. Poor housing has an adverse effect on an individual's physical and mental wellbeing. Older people are more likely to live with chronic health conditions which can be exacerbated by poor quality housing.

4.21 Demand from older people for health, social care, and housing-related services is rising significantly which is noted within the Housing Strategy 2016-2019 and services will struggle to cope unless this demand is addressed by enabling more people to help themselves through housing that promotes independence.

4.22 Whilst most older people in Hastings are homeowners and want to stay within their own home, many look to move into accommodation with support in the social rented sector, often because their existing homes are unsuitable as their health needs change. The Sussex Health and Care report Improving Lives Together Our Plan for our Population 2023-28 states that expanding the use of virtual wards to allow more people to be cared for in their own homes when they would otherwise have gone into hospital for care was one of its 5 key aims for 2023. This demonstrates that there is a push both from health providers and occupiers for a shift in the balance of care from serviced care to at home care.

4.23 An ageing population in Hastings will increase the number of people whose mobility is impaired by physical disability. When people live in poor quality housing or housing that is not appropriate for their needs, poor mobility and risk of falls increases, and demand increases for adaptations.

4.24 A substantial proportion of older person households currently under-occupy their homes as set out within the Private Sector Stock Condition Survey 2023. It is therefore important to provide more appropriate and accessible new homes in the general market.

4.25 New analysis from the Centre for Ageing Better reveals it would take 44 years to meet the current demand for accessible and adaptable housing in England at the current rate of construction. According to the HEDNA around 7.1% of local authority/housing association households have a wheelchair user, compared with 3.1% of owner occupied households and 1.4% of private rented households. As of 31 March 2025 there were 1749 people on the waiting list for social housing demonstrating a need for new affordable housing and that there is a need for new wheelchair accessible housing.

4.26 Given the current lack of accessible and adaptable homes and the projected future demands, Policy SC2 requires that on new build sites providing affordable housing that, at least 10% of the affordable dwellings should be designed to be accessible and adaptable in accordance with technical standard M4(2) (Figure.1) or suitable for wheelchair users in accordance with M4(3) (Figure.2) of the Building Regulations (or as updated).

Figure.1 M4(2): Accessible and Adaptable Dwellings

M4(2): Accessible and Adaptable Dwellings

This standard establishes a baseline for properties capable of meeting the needs of a person with limited mobility.

Key Requirements Include:

- Step-free access to the main entrance
- Wider doorways and circulation routes
- Entrance-level WC and living accommodation
- Scope for a future through-floor lift
- Strengthened bathroom walls (to support grab rails, seats, etc.)
- Switches, sockets, and controls at accessible heights

Figure.2 M4(3): Wheelchair User Dwellings

M4(3): Wheelchair User Dwellings

This standard represents the highest accessibility standard and contains two legally important subcategories:

M4(3)a: Wheelchair Accessible (ready for immediate occupation) - The property is suitable for immediate client occupancy.

M4(3)b: Wheelchair Adaptable (requires additional work before being usable) - The property requires significant, costed adaptation works before the client can move in.

If a planning condition requires M4(3) standards, the subcategory must be specified. Otherwise, the default is M4(3)b - Adaptable. Navigating the technical requirements for adaptable status and correctly scoping the cost of required works is a key part of our architectural and property finding service.

Key Requirements Include:

- Step-free access throughout the property
- Larger circulation and wheelchair turning spaces in key rooms
- Entrance-level living space, kitchen, and an accessible WC/ shower room
- A fully accessible bedroom with required clearances
- Space for storing and charging mobility equipment
- Accessible parking bat, appropriately sized and located

4.27 The Equality Impact Assessment January 2021 acknowledges that Policy SC2 would ensure that there is a variety of good quality housing in sustainable locations which will particularly benefit those with age and disability characteristics.

5.0 Viability

5.1 Hastings Borough Council introduced the Nationally Described Space Standards within Policy DM3 – General Amenity, of the Current Local Plan Adopted in 2015. Policy DM4 – General Accessibility further required that good accessibility is provided for all, especially for

people with a physical or sensory impairment; and, that powered lift systems are installed to all floors for any new buildings (except a single dwelling house) of three storeys or more. The lifts should be designed to allow for their use by disabled people and particularly those who use wheelchairs. Therefore these requirements have been in place in Hastings for a number of years and developers who operate within the area are aware that this is a current requirement for planning permissions

5.2 The viability implications of applying the Nationally Described Space Standards and requiring accessible and adaptable homes have been examined through work commissioned by the Council to ensure that all of the policies in the Local Plan are deliverable and are fully informed by careful viability analysis. Aspinall Verdi was appointed in 2018 to prepare a Whole Plan Viability Assessment which forms part of the evidence base informing and supporting the Hastings Local Plan. Work to date on The Whole Plan Viability Assessment and the advice therein indicates that a requirement of 100% of new dwellings to meet the National Described Space Standards and that as part of the affordable housing requirement, developers need to provide 10% of the total housing requirement to be adaptable in accordance with technical standard M4(2) or meet M4(3): Category 3 - Wheelchair Accessible Dwellings, were viable requirements of the plan.

5.3 The Local Plan Viability Assessment confirms that a requirement for 100% of new build homes to meet the Nationally Described Space Standards and 10% of the affordable housing to be accessible and adaptable are viable. However, it is understood that some sites may have particular challenges with viability and issues around viability will be assessed on a case by case basis.

6.0 Timing

6.1 With reference to the timing of introduction of the Nationally Described Space Standards, the Planning Practice Guidance suggests that a transitional period may be required following adoption of such a standard to enable any additional costs to be considered within land acquisitions. As previously stated these standards have been in place since the adoption of the previous Local Plan.

6.2 Therefore it is considered that no transitional arrangements would be required as the development industry (developers, landowners and planning agents/consultants) who are active within Hastings have been aware of the Council's requirements for minimum internal space standards and accessible and adaptable homes for sometime as set out within Policies DM3 and DM4 of the Hastings Adopted Local Plan 2015.

6.3 The Nationally Described Space Standards are used at this stage by the Council to refuse planning applications for new build dwellings which do not meet the standards and it is proving to be a helpful indicator for both planning officers and developers in terms of assessing the quality of the design and layout of schemes. Furthermore, applications for changes of use to new dwellings also have had to comply with Nationally Described Space Standards since they were introduced in 2015.