

Portsmouth Local Plan 2038

# Residential Space Standards background paper



July 2021



## Contents

|  |    |
|--|----|
| 1. Introduction.....   | 3  |
| 2. Policy Context .....                                      | 4  |
| 3. Need for Minimum Space Standards- National Context .....  | 5  |
| 4. Portsmouth Local Plan .....                               | 7  |
| 5. Assessment and Findings for Internal Space Standards..... | 8  |
| 5.2 Need for Minimum Space Standards in Portsmouth.....      | 8  |
| 6. Potential Viability Impacts .....                         | 11 |
| 7. External Space Standards .....                            | 12 |
| 8. Recommendations for draft new Local Plan .....            | 14 |
| Appendix 1: Schemes meeting space standards .....            | 15 |

## 1. Introduction

- 1.1 In March 2015 the Government announced a new approach to the setting of technical standards for housing in England; Local Planning Authorities can opt to use Nationally Described Space Standards (NDSS) where justified to ensure homes meet minimum size requirements, rather than setting their own standards for internal space in their Local Plans.
- 1.2 The City Council is dedicated to ensuring that the provision of high quality living environments is not comprised by the need to deliver the necessary new housing for the city.
- 1.3 This evidence as shown in this paper indicates that there is a need within Portsmouth to adopt the NDSS. Policy H6 of the new Local Plan sets out this position along with locally specific requirements.
- 1.4 Residential 'space standards' refer to the minimum internal space (gross internal floor area) for new dwellings. The NDSS for new homes set out requirements for the floor space area and dimensions of the building and particular areas according to the number of beds and occupants, including dimensions for bedrooms, storage and floor to ceiling height.
- 1.5 New homes must meet the needs of current and future residents and set the foundations for well-designed, safe environments that support health and well-being. The application of space standards will ensure internal floorspace in new developments are suitable for the number of people the dwelling is designed to accommodate.
- 1.6 Currently, there is no national standard for outside private or communal space as part of the Nationally Described Space Standards. This report therefore also considers if there is a local need for such guidelines or a policy requirement on outside space provided alongside new developments.

## 2. Policy Context

### National Policy

2.1 The National Planning Policy Framework (para.127) states that:

*Planning policies and decisions should ensure that developments:*

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users<sup>46</sup>; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience*

2.2 Foot note 46 to para 127 of the NPPF states that: Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.

2.3 'Where an LPA aims to adopt an internal space standard, National Planning Practice Guidance (PPG)<sup>1</sup> states that LPAs 'should only do so with reference to the NDSS'. Where a need for an internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. The guidance further advises the justification for requiring internal space standards takes account of the following:

- **Need** –evidence of the size and type of dwellings currently being built in order to ensure that any impacts of adopting the standard can be appropriately evaluated.
- **Viability** – any impacts as part of the Local Plan's overall viability assessment to examine any impact overall housing supply and affordability and;

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<sup>1</sup> National Planning Policy Guidance (March 2015) Housing: optional technical standards

- **Timing** – if there should be a transition period following adoption of a new policy position to allow developers to consider any additional costs the impacts to be accounted for in future land acquisitions.
- 2.4 In terms of outside space, there is no national policy or guidance, ancillary to the need to provide a wide range of high quality dwelling as described in the NPPF.
- 2.5 In responses the economic impact of the Covid-19 pandemic, the Government introduced a new Use Class E for main town centre uses from September 2020, covering uses previously separate commercial, office and leisure uses (under the revoked Classes A1/2/3, B1, D1(a-b) and D2(e)). This was followed in March 2021 by a change to permitted development rights, allowing Class E uses to change to a residential use (Class C3) under without the need for full planning permission through the 'prior approval' process.
- 2.6 The Government closed the space standards 'loophole' on permitted changes of use to residential in September 2020 by requiring that all new homes would now need to meet the nationally described space standards, as well as needing to provide for adequate natural light (2019). However, since the employment to residential 'prior approvals' for permitted development were first implemented in 2013 they have, in some circumstances, have been used to deliver sub-standard homes in terms of adequate size, amenity space and design in buildings that were not originally intended for residential use. The 'prior approval' process has delivered over 60,000 new homes in the last four years.
- 2.7 Where new homes still require full planning permission, the NPPF (para. 127) sets out that a range factors that may impact upon the design and layout of development, such as optimising the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and to support local facilities and transport networks. New development must create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

### 3. Need for Minimum Space Standards- National Context

- 3.1 In recent years there has been mounting national public concern regarding the quality of new homes being delivered. As of 2019, the average size of a new dwelling in the UK, at 76sqm<sup>2</sup>, is the smallest in Europe, compared to 87.7sqm in Ireland, and 115.5sqm in the Netherlands. A lack of storage space provided in new dwellings has also been documented as a concern. There is the suggestion that homebuyers tend to focus on the number of bedrooms they can purchase rather than total floor space, which creates some limitations for the appeal of 1 and/or 2 bedroom dwellings. Arguably this creates an element of market failure as house builders are incentivised to prioritise maximising the number of bedrooms in lieu of providing rooms of an adequate size. Following their occupation of the house,

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<sup>2</sup> [Average floor size area of dwellings in England by tenure](#)

buyers may conclude that the small room sizes pose an issue for their everyday needs.

- 3.2 Research has also suggested an association exists between overcrowded and inadequate space and poor health and development rates, especially for children<sup>3</sup>. The RIBA 2011 report 'The Case for Space: the size of England's new homes'<sup>4</sup> details how even small increases in floor area have significant lifestyle impacts. For example, it highlights that 4m<sup>2</sup> is the equivalent of a single bed, a bedside table and a dressing table with a stool. It is the space that allows you to work at home at the computer in the day and have an extra sofa. 8 metre squared is the equivalent of a single bedroom and the furniture anticipated to fit comfortably within it. The report also highlights how substandard space in homes can result in adverse social impacts. It refers to a review of existing research which suggests that the space in homes can affect the educational outcomes of children, public health costs, individual wellbeing and interpersonal interactions and relationships.
- 3.3 Stemming from these issues, it is evident that there is an overarching need to ensure that new dwellings provide suitable internal spaces. While the needs of families and individuals will differ considerably, the NDSS would constitute a benchmark for all new dwellings to satisfy with ensuring adequate space.

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<sup>3</sup> Office of the Deputy Prime Minister. (2004). The Impact of Overcrowding on Health and Education: A review of the Evidence and Literature

<sup>4</sup> [The Case for Space: the size of England's new homes](#)

## 4. Portsmouth Local Plan

4.1 Policy PCS19 of the current Portsmouth Plan sets out requirements for new build space standards:

- *Housing size: All new development and housing conversions should be of a reasonable size appropriate to the number of people the dwelling is designed to accommodate. Therefore, apart from in exceptional circumstances where it can be shown that the standards are not practicable or viable, all new dwellings and conversions should meet Portsmouth City Council minimum space standards for internal floorspace.*
- *These standards will be kept under review to ensure an appropriate balance of dwelling size is achieved and maintained across the city.*
- *The requirements for housing mix and space standards do not apply to developments made up entirely of sheltered accommodation, extra care, or purpose built student housing.*

4.2 The Portsmouth City Council minimum space standards referred to have since been superseded by the NDSS.

4.3 The Council has adopted several relevant Supplementary Planning Documents (SPDs) that consider the requirements of different housing types, including appropriate minimum standards where relevant, that have since been partly superseded by the introduction of the NDSS. These include: Sustainable Design and Construction<sup>5</sup>, Student Halls of Residence<sup>6</sup>, Houses in Multiple Occupation (HMOs)<sup>7</sup> and Housing Standards<sup>8</sup>.

4.4 The Council currently still has the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of both access and water.

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<sup>5</sup> PCC (2015) Sustainable Design and Construction Supplementary Planning Document

<sup>6</sup> PCC (2014) Student Halls of Residence Supplementary Planning Document

<sup>7</sup> PCC (2019) Homes in Multiple Occupation Supplementary Planning Document

<sup>8</sup> PCC Housing Standards Supplementary Planning Document

## 5. Assessment and Findings for Internal Space Standards

- 5.1 This report reviews the evidence for the need to adopt minimum space standards for new residential development in Portsmouth, and in addition whether adoption would result in viability or timing-related consequences for housing delivery in the City.

### Need for Minimum Space Standards in Portsmouth

- 5.2 Portsmouth, as reportedly the 'most densely populated city outside parts of London' with pressures on public open space from a growing population, needs to have homes that are sufficient in size and amenity provision to support resident's mental and physical well-being.
- 5.3 Although space is an important element of high quality development, homes that offer adequate internal floor area but lack amenity or storage space are unlikely to meet the needs of residents.
- 5.4 Portsmouth has a number of areas ranked amongst the highest levels of deprivation in the country, including 15 Lower Layer Super Output Areas (LSOAs) ranked in the 10% most deprived areas in England<sup>9</sup>. The city needs to work to improve living standards for its residents, it is important therefore that minimum space standards are adopted to avoid the creation of substandard dwellings, particularly for those residents who may have the least choices who are in smaller dwellings as that is the only option that is possible for them.

### Analysis of Recent Housing Completions

- 5.5 In accordance with the PPG requirements, Local Authorities need to look to conclude whether there is a local need to implement space standards, and if so, the Local Authorities should collect evidence on the size and types of dwellings being built in the area. To do so, the Council has created a list of housing developments that have been commenced or completed in the three years between April 2017 and March 2020. This list has been compiled from the Council's monitoring data. This list provides an illustration of size and types of dwellings currently being built in the City.
- 5.6 Given that the space standards cannot currently be required in relation prior approval applications for new dwellings, these have been excluded from the list of applications assessed. However, conversions which have been subject of a planning application have been included. For developments where in excess of one dwelling is provided, and where the Council has data on completion or commencement for any dwellings, the entire development has been evaluated in consideration of the standard.
- 5.7 Each planning application has been assessed against the national minimum space standards, using the Council's digital copies of floor plans. Where a detailed accommodation schedule is available with an application, this has also been considered. Specifics of bedroom widths, bedroom areas, the area of built in storage, and gross internal area of dwellings have all been documented. Given that many planning applications do not include sectional drawings, applications have not been

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<sup>9</sup> <https://documents.hants.gov.uk/Economy/IndexofMultipleDeprivation.pdf>

checked as to whether they satisfy the minimum ceiling height contained in the standards.

5.8 In instances where development fails to meet a particular criterion of the standard, the conclusion is that the dwelling fails to reach the standard overall. However, in the analysis, a distinction has been made for those dwellings that fail solely on the provision of built in storage. This distinction is on the basis that floorplans provided for a planning application may not be fully detailed, and consequently built-in storage may still be provided even if it is not visible at the time of the illustration. Furthermore, built-in storage can normally be provided at a later date without undermining compliance with the space standard overall. The detail of the relevant applications are included in Appendix 1.

5.9 Significantly, a substantial amount of applications pre-date the introduction of the NDSS. The use of recent permissions rather than recent commencements and completions could plausibly provide a more accurate picture.

5.10 Plans for a total of 345 units across nine house types were assessed. Overall 269 units (78%) met all aspects of the NDSS, with 76 units or 22% failing to meet the minimum internal space standards.

5.11 Smaller dwellings with fewer beds were significantly less likely to be Space Standard compliant than dwellings with more bedrooms; only 32% of the one-bed, one person dwellings permitted met the Standards. By comparison, the National Space Standards were met by every permitted three-bed / five person dwelling and 82% of the two-bed four person dwellings.

5.12 Over the period assessed, two-bedroom, three-person units made up the largest proportion of dwellings being built 96 (36%), whereas there were 76 (28%) one-bedroom one-person units, 71 (26%) one-bedroom two-person bedroom units and 34 (13%) three-bedroom four-person bedroom dwellings built. Similar percentages of one-bedroom two-person and two-bedroom four-person dwellings pass the standard, of between 77% and 82%, and progressively higher proportions of passes for dwellings with more bedrooms, at 97% for both two-bedroom three-person and three-bedroom four-person dwellings. There is a clear trend of smaller dwellings being less successful at passing the standard. These findings are set out in Table 1 below.

**Table 1. NDSS ASSESSMENT BY DWELLING TYPE**

| <b>DWELLING TYPE</b> | <b>NDSS PASS</b> | <b>NDSS FAIL</b> | <b>TOTAL UNITS</b> | <b>% NDSS PASS</b> |
|----------------------|------------------|------------------|--------------------|--------------------|
| 1 bedroom, 1 person  | 25               | 51               | 76                 | 32.9               |
| 1 bedroom, 2 person  | 55               | 16               | 71                 | 77.5               |
| 2 bedroom , 4 person | 14               | 3                | 17                 | 82.4               |
| 2 bedroom, 3 person  | 93               | 3                | 96                 | 96.9               |
| 3 bedroom, 4 person  | 33               | 1                | 34                 | 97.1               |
| 3 bedroom, 5 person  | 17               | 0                | 17                 | 100                |
| 3 bedroom, 6 person  | 2                | 0                | 2                  | 100                |
| 4 bedroom, 5 person  | 8                | 0                | 8                  | 100                |
| 4 bedroom, 6 person  | 25               | 0                | 25                 | 100                |

## 6. Potential Viability Impacts

- 6.1 Broadly, the result of space standards on the viability of a development are that that further costs of larger dwellings are offset by a corresponding increase in the value of a home. Build costs are usually assessed on a £/sqm measurement, and an increase in the size of dwellings can be anticipated to have a proportionate impact on build costs. The impact on the value of a property is likely to be less well defined, as it is influenced by a multiple factors, principally if purchasers are in a position to pay higher amounts, whether they are willing to, and the supply of available dwellings of a comparable type in the market.
- 6.2 As part of the preparation of a new Portsmouth Local Plan the commissioned a viability study, which has considered the viability of all of the Local Plan proposed policies, including minimum space standards. The viability testing employed the NDSS as baseline in determining the appropriate levels of a range of other contributions.
- 6.3 Notably, as discussed in the section above, the majority of housing being built in the City satisfies the space standards. As the majority of developments can currently viably meet the space standard, although less so for smaller units, this further suggests that the formal adoption of minimum space standards in the new Local Plan should not have a significant impact on the viability of development proposals.
- 6.4 The viability study forms part of the evidence base, and will be subject to public scrutiny through the Local Plan Examination. On this basis it is not anticipated that the introduction of space standards should have any noteworthy impact on the viability of delivering housing within the City.

## 7. External Space Standards

- 7.1 The NPPF promotes (para 127, points e and f) including green and other public space which promote health and well-being, with a high standard of amenity for existing and future users.
- 7.2 According to a YouGov poll, commissioned by RIBA in December 2010 the top things that people look for when moving home are outside space (49%), the size of the rooms (42%), and proximity to local services (42%). The Covid-19 pandemic has since strongly highlighted to need for access adequate outdoor and amenity spaces and the benefits of proximity to outdoor greenspaces for health and wellbeing.
- 7.3 Types of external space can vary depending on the form and location of a dwelling. Regardless of whether it is a balcony with space for laundry or a private garden with play space for children, nearly all dwellings will require some element of outside space to ensure they are useable and enjoyable places to live. The three main forms of private outside space are balconies, communal gardens for flatted developments, and private gardens for houses.
- 7.4 Policy PCS13: A Greener Portsmouth requires schemes of 50 dwellings or more to deliver, publically accessibility additional open space. However, the policy didn't anticipate the market interest in student accommodation in the city centre following the adoption of the Plan in 2012, resulting in a number of major schemes that weren't required to meet this provision. Ensuring adequate amenity space and access to outdoor space will be key to help meet the Council's health and well-being aims for the preparation of the new Local Plan, the new open space policy will therefore apply to a greater range of accommodation types as appropriate. Portsmouth have not adopted minimum standards for private or communal outdoor amenity space to date.
- 7.5 As the only city in the UK with, supposedly even greater levels of residential unit density, London, in the London Plan 2021<sup>10</sup>, attempts to address such issues through their Policy D6 Housing Quality and Standards, which states that where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m.
- 7.6 The approach to outdoor, amenity and storage space will be consulted on as part of the preparation of the new Local Plan; this will help gather evidence on whether a specific minimum standard should be set.

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<sup>10</sup> The London Plan 2021: [https://www.london.gov.uk/sites/default/files/the\\_london\\_plan\\_2021.pdf](https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf)

## **Building Regulations Standards**

- 7.7 The provision of accessible and adaptable homes is needed to meet the housing needs of a range of people in the community, including the elderly and those with disabilities and mobility impairments. As the proportion of older people in the City is expected to grow, new housing should be designed to meet the needs of residents throughout their lifetime.
- 7.8 The Housing Needs Assessment, undertaken for the new Local Plan, identifies a minimum need for 41% of new dwellings to meet M4 (2) standards (accessible and adaptable homes) and 5% to meet M4(3) standards (wheelchair user dwellings) by the end of the plan period.
- 7.9 The requirements focus on elements such as step free access and circulation space. Applicants will have to consider these standard in designing layouts, as the circulation space around beds needed to comply with the standard encourages simple rectangular rooms.
- 7.10 The need to meet this Building Regulation Standards, plus an appropriate tenure mix of older persons accommodation, will be incorporated into draft Policy H2: Housing Types, Mix and Affordability.

## 8. Recommendations for draft new Local Plan

- 8.1 A significant number of new homes are proposed for the plan period to meet the Government's housing targets for Portsmouth. As such it is critical that these developments comprise a high standard of design and support the health and wellbeing of their occupants. The adoption of policies relating to space standards in the new Local Plan will ensure that all new residential development satisfies the needs of residents.
- 8.2 The aim of draft Policy H6: Space Standards will be to address overcrowding in homes and increase the number of people living in decent sized homes in the city with access to sufficient amenity space.
- 8.3 The adoption of the National Space Standards will apply to all new homes, across tenures, including changes of use which require planning permission. There are no maximum standards and developers are encouraged to provide larger rooms and dwellings where appropriate and in-line with Policy H4: Housing Density.
- 8.4 Additional standards for affordable housing (both privately and publically funded) can be found in the Council's Providing Affordable Housing in Portsmouth guidance document.
- 8.5 The following draft policy will be consulted on as part of the 'Regulation 18' draft of the new Local Plan.

### Policy H6: Residential Space Standards

Where planning permission is required, development proposals for new homes (including change of use or conversions) should ensure that the layout and size are suitable to meet the amenity needs of future occupiers.

Planning permission will be granted for new homes that:

- Meet as a minimum the Nationally Described Space Standards (or future equivalent).
- Provide sufficient private and/ or communal outdoor amenity space/ balcony space proportionate to the number of bedrooms. Where development is in close proximity to public open space, reduced provision may be acceptable.
- Provide sufficient storage space for refuse and recycling
- Provide sufficient levels of weatherproof and secure bicycle parking (in accordance with levels set out in the Council's Parking Standards SPD)

Policy H6's aim of increasing the number of Portsmouth's residents living in decent sized homes and ensuring new development provides sufficient space for daily activities is proposed to be assessed and monitored through of the proportion of new dwellings granted planning permission that meet nationally prescribed space standards as well as the proportion of new dwellings providing sufficient refuse, recycling and bicycle parking facilities.

## Appendix 1: Schemes meeting space standards

Appendix 1 analyses permitted planning applications within the City over the last few years which are of a scale and type that allows for application of the NDSS and the shows the number of schemes which meet the standard. In addition it also highlights how units accommodating different numbers of people / bedrooms perform against the standards.

| Application number | No. of beds (b)& people (p)of unit | Floor Space (sqm) | NDSS standard (sqm) | Below or above NDSS Standards (sqm) | Number of units | Total difference to NDSS per unit (sqm) | Total number of units satisfying NDSS (per scheme) | Total units below NDSS standard (per scheme) |
|--------------------|------------------------------------|-------------------|---------------------|-------------------------------------|-----------------|---|--|--|
| 18/00511/FUL       | 1b3p                               | 62                | 37                  | 25                                  | 1               | 25                                      |  |  |
|                    | 2b4p                               | 70                | 79                  | -9                                  | 1               | -9                                      |  |  |
|                    | 1b2p                               | 52                | 58                  | -6                                  | 1               | -6                                      |  |  |
|                    |                                    |                   |                     |                                     |                 |   | 1  | 2  |
| 18/01147/FUL       | 2b3p                               | 62                | 61                  | 1                                   | 5               | 5                                       |  |  |
|                    | 2b3p                               | 77                | 61                  | 16                                  | 2               | 32                                      |  |  |
|                    | 2b3p                               | 71                | 61                  | 10                                  | 1               | 10                                      |  |  |
|                    | 2b3p                               | 86                | 61                  | 25                                  | 2               | 50                                      |  |  |
|                    |                                    |                   |                     |                                     |                 |   | 10   | 0  |
| 18/01351/FUL       | 1b2p                               | 45                | 50                  | -5                                  | 8               | -40                                     |  |  |
|                    | 1b1p                               | 38                | 37                  | 1                                   | 2               | 2                                       |  |  |
|                    | 2b3p                               | 61                | 61                  | 0                                   | 2               | 0                                       |  |  |
|                    | 1b2p                               | 51                | 50                  | 1                                   | 2               | 2                                       |  |  |
|                    | 1b2p                               | 41                | 50                  | -9                                  | 1               | -9                                      |  |  |
|                    | 1b2p                               | 42                | 50                  | -8                                  | 1               | -8                                      |  |  |
|                    | 1b2p                               | 38                | 50                  | -12                                 | 1               | -12                                     |  |  |
|                    | 1b1p                               | 38                | 37                  | 1                                   | 1               | 1                                       |  |  |
|                    |                                    |                   |                     |                                     |                 |   | 9  | 9  |
| 18/00014/PACOU     | 2b4p                               | 61                | 70                  | -9                                  | 3               | -27                                     |  |  |
|                    | 2b3p                               | 70                | 61                  | 9                                   | 3               | 27                                      |  |  |
|                    |                                    |                   |                     |                                     |                 |   | 3  | 3  |
| 18/00813/FUL       | 4b5p                               | 114               | 103                 | 11                                  | 3               | 33                                      |  |  |
|                    | 4b5p                               | 123               | 103                 | 20                                  | 2               | 40                                      |  |  |
|                    | 4b5p                               | 104               | 103                 | 1                                   | 2               | 2                                       |  |  |
|                    | 2b3p                               | 84                | 70                  | 14                                  | 1               | 14                                      |  |  |
|                    |                                    |                   |                     |                                     |                 |   | 8  | 0  |
| 17/01284/FUL       | 2b3pF                              | 83                | 61                  | 22                                  | 4               | 88                                      |  |  |
|                    | 2b3p                               | 90                | 61                  | 29                                  | 4               | 116                                     |  |  |
|                    | 1b2p                               | 74                | 50                  | 24                                  | 1               | 24                                      |  |  |
|                    | 1b2p                               | 79                | 50                  | 29                                  | 1               | 29                                      |  |  |
|                    |                                    |                   |                     |                                     |                 |   | 10   | 0  |
| 18/00685/FUL       | 1b2p                               | 49                | 50                  | -1                                  | 1               | -1                                      |  |  |
|                    | 2b3p                               | 66                | 61                  | 5                                   | 1               | 5                                       |  |  |
|                    | 1b2p                               | 52                | 50                  | 2                                   | 1               | 2                                       |  |  |
|                    | 2b3p                               | 72                | 61                  | 11                                  | 1               | 11                                      |  |  |
|                    | 1b1p                               | 45                | 37                  | 8                                   | 1               | 8                                       |  |  |
|                    | 1b2p                               | 55                | 50                  | 5                                   | 1               | 5                                       |  |  |
|                    |                                    |                   |                     |                                     |                 |   | 5  | 1  |
| 18/00910/FUL       | 1b2p                               | 52                | 50                  | 2                                   | 4               | 8                                       |  |  |
|                    |                                    |                   |                     |                                     |                 |   | 4  | 0  |
| 18/00558/FUL       | 1b2p                               | 50                | 50                  | 0                                   | 2               | 0                                       |  |  |
|                    | 1b2p                               | 54                | 50                  | 4                                   | 1               | 4                                       |  |  |

|                |      |     |     |     |    |     |    |    |
|----------------|------|-----|-----|-----|----|-----|----|----|
|                | 2b3p | 63  | 61  | 3   | 2  | 6   |    |    |
|                |      |     |     |     |    |     | 5  | 0  |
| 18/00793/FUL   | 3b6p | 108 | 95  | 13  | 1  | 13  |    |    |
|                | 3b6p | 106 | 95  | 11  | 1  | 11  |    |    |
|                | 1b1p | 44  | 37  | 7   | 1  | 7   |    |    |
|                | 2b3p | 61  | 61  | 0   | 1  | 0   |    |    |
|                | 1b1p | 41  | 37  | 4   | 1  | 4   |    |    |
|                | 1b2p | 57  | 50  | 7   | 2  | 14  |    |    |
|                | 1b1p | 39  | 37  | 2   | 4  | 8   |    |    |
|                | 3b5p | 104 | 86  | 18  | 1  | 18  |    |    |
|                | 2b4p | 93  | 70  | 23  | 2  | 46  |    |    |
|                | 2b4p | 90  | 70  | 20  | 2  | 40  |    |    |
|                |      |     |     |     |    |     | 16 | 0  |
| 18/00300/FUL   | 1b2p | 91  | 58  | 33  | 1  | 33  |    |    |
|                | 1b1p | 38  | 37  | 1   | 1  | 1   |    |    |
|                | 1b2p | 39  | 37  | 2   | 1  | 2   |    |    |
|                | 2b3p | 74  | 70  | 4   | 1  | 4   |    |    |
|                |      |     |     |     |    |     | 4  | 0  |
| 17/01097/FUL   | 2b3p | 72  | 61  | 11  | 5  | 55  |    |    |
|                | 2b3p | 63  | 61  | 2   | 2  | 4   |    |    |
|                | 1b2p | 56  | 50  | 6   | 1  | 6   |    |    |
|                | 1b2p | 65  | 50  | 15  | 1  | 15  |    |    |
|                |      |     |     |     |    |     | 9  | 0  |
| 18/00002/PACOU | 1b1p | 31  | 37  | -6  | 11 | -66 |    |    |
|                | 1b1p | 32  | 37  | -5  | 14 | -70 |    |    |
|                | 1b1p | 30  | 37  | -7  | 14 | -98 |    |    |
|                | 1b1p | 20  | 37  | -17 | 4  | -68 |    |    |
|                | 1b1p | 35  | 37  | -2  | 2  | -4  |    |    |
|                | 1b1p | 33  | 37  | -4  | 5  | -20 |    |    |
|                | 1b1p | 39  | 37  | 2   | 2  | 4   |    |    |
|                | 1b1p | 28  | 37  | -9  | 1  | -9  |    |    |
|                | 1b1p | 41  | 37  | 4   | 1  | 4   |    |    |
|                | 1b1p | 36  | 37  | -1  | 1  | -1  |    |    |
|                |      |     |     |     |    |     | 3  | 52 |
| 18/00001/PACOU | 1b1p | 50  | 37  | 13  | 3  | 39  |    |    |
|                | 2b3p | 62  | 61  | 1   | 3  | 3   |    |    |
|                |      |     |     |     |    |     | 6  | 0  |
| 18/00453/FUL   | 1b1p | 40  | 37  | 3   | 1  | 3   |    |    |
|                | 1b2p | 51  | 50  | 1   | 1  | 1   |    |    |
|                | 2b4p | 94  | 70  | 24  | 2  | 48  |    |    |
|                |      |     |     |     |    |     | 4  | 0  |
| 16/01140/FUL   | 1b2p | 51  | 50  | 1   | 13 | 13  |    |    |
|                | 2b3p | 63  | 61  | 2   | 11 | 22  |    |    |
|                | 2b4p | 84  | 70  | 14  | 3  | 42  |    |    |
|                | 1b1p | 44  | 37  | 7   | 3  | 21  |    |    |
|                |      |     |     |     |    |     | 30 | 0  |
| 17/00111/FUL   | 1b2p | 62  | 50  | 12  | 1  | 12  |    |    |
|                | 2b3p | 63  | 61  | 2   | 1  | 2   |    |    |
|                | 2b3p | 80  | 61  | 19  | 1  | 19  |    |    |
|                |      |     |     |     |    |     | 3  | 0  |
| 18/00130/FUL   | 2b3p | 65  | 61  | 4   | 1  | 4   |    |    |
|                | 1b2p | 45  | 50  | -5  | 2  | -10 |    |    |
|                |      |     |     |     |    |     | 3  | 0  |
| 16/02107/OUT   | 4b5p | 147 | 103 | 44  | 1  | 44  |    |    |
|                | 4bp  | 162 | 103 | 59  | 2  | 118 |    |    |
|                | 3b4p | 107 | 90  | 17  | 3  | 51  |    |    |
|                | 1b2p | 50  | 50  | 0   | 1  | 0   |    |    |
|                | 1b1p | 43  | 37  | 6   | 1  | 6   |    |    |
|                | 3b4p | 74  | 84  | -10 | 1  | -10 |    |    |
|                | 2b3p | 86  | 70  | 16  | 1  | 16  |    |    |

|              |  |     |    |    |    |     |            |           |
|--------------|--|-----|----|----|----|-----|------------|-----------|
|              |  |     |    |    |    |     | 9          | 1         |
| 17/00224/OUT | 2b3p   | 70  | 61 | 9  | 24 | 216 |            |           |
|              | 3b4p   | 88  | 74 | 14 | 30 | 420 |            |           |
|              | 4b6p   | 113 | 99 | 14 | 10 | 140 |            |           |
|              | 4b6p   | 110 | 99 | 11 | 12 | 132 |            |           |
|              | 3b5p   | 100 | 99 | 1  | 16 | 16  |            |           |
|              | 2b4p   | 79  | 70 | 9  | 3  | 27  |            |           |
|              | 4p6p   | 112 | 99 | 13 | 3  | 39  |            |           |
|              |  |     |    |    |    |     | 98         | 0         |
| 17/01987/FUL | 1b2p   | 54  | 50 | 4  | 1  | 4   |            |           |
|              | 1b2p   | 53  | 50 | 3  | 1  | 3   |            |           |
|              | 1b2p   | 47  | 50 | -3 | 1  | -3  |            |           |
|              |  |     |    |    |    |     | 3          | 0         |
| 17/00473/OUT | 1b2p   | 50  | 50 | 0  | 12 | 0   |            |           |
|              |  |     |    |    |    |     | 12         | 0         |
| 17/01462/FUL | 1b2p   | 50  | 58 | -8 | 4  | -32 |            |           |
|              | 1b1p   | 46  | 37 | 9  | 2  | 18  |            |           |
|              | 2b3p   | 63  | 70 | -7 | 2  | -14 |            |           |
|              |  |     |    |    |    |     | 2          | 6         |
| 17/00865/FUL | 1b2p   | 50  | 50 | 0  | 2  | 0   |            |           |
|              | 2b2p   | 64  | 61 | 3  | 1  | 3   |            |           |
|              | 2b3p   | 66  | 70 | -4 | 1  | -4  |            |           |
|              | 1b2p   | 56  | 50 | 6  | 1  | 6   |            |           |
|              | 2b2p   | 54  | 61 | -7 | 1  | -7  |            |           |
|              |  |     |    |    |    |     | 4          | 2         |
| 17/01054/FUL | 1b1p   | 58  | 37 | 21 | 1  | 21  |            |           |
|              | 2b4p   | 75  | 70 | 5  | 1  | 5   |            |           |
|              | 1b1p   | 53  | 37 | 16 | 1  | 16  |            |           |
|              | 2b4p   | 78  | 70 | 8  | 1  | 8   |            |           |
|              | 2b3p   | 71  | 61 | 10 | 2  | 20  |            |           |
|              | 2b3p   | 65  | 61 | 4  | 2  | 8   |            |           |
|              |  |     |    |    |    |     | 8          | 0         |
|              |  |     |    |    |    |     |            |           |
|              | <b>Total number of units above and below NDSS standard</b> |     |    |    |    |     | <b>269</b> | <b>76</b> |
|              |  |     |    |    |    |     |            |           |

End of document.