

Flat Conversions

Supplementary Planning Guidance



January 2019



FINAL DRAFT

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1 Introduction

1.1 What is Supplementary Planning Guidance (SPG)?

The Welsh Government (WG) support the use of Supplementary Guidance to set out detailed guidance on the way in which Local Development Plan (LDP) policies will be applied in particular circumstances or areas. SPG must be consistent with development plan policies and National Planning policy guidance. Before it is adopted, an SPG undergoes a period of public consultation and must be approved by the council. Upon adoption by Cardiff Council in January 2019, the SPG became a material consideration in the determination of relevant planning applications.

1.2 What is the history of the Flat Conversions SPG?

The SPG went to public consultation between 20th September and 1st November 2018. It was adopted by Cardiff Council on xx/xx.

1.3 What is the purpose of this SPG?

- 1.3.1 This SPG refers to the conversion of buildings into flats. It does not deal with new build flats. It is recognised that conversions of older properties into flats offer unique challenges that warrant their own policies whereas new build flats tend to benefit from less 'constraints', most notably in terms of space restrictions that the existing building encompasses. In addition to this SPG, the *Cardiff Residential Extensions & Alterations SPG* (Adopted 2017) should be referenced in circumstances where flat conversions require extensions or notable alterations to the existing building.
- 1.3.2 New build flats should reference the *Cardiff Infill Sites SPG* (2017) and the *Residential Design Guide SPG* (2017) which outline key principles for new developments in terms of design and amenity.
- 1.3.3 Houses in Multiple Occupation (HMOs) are addressed in the *Houses in Multiple Occupation SPG* (2016). Whilst sharing similar characteristics with residential conversions to flats, HMOs are defined in broad Planning terms by retaining a single unit of shared accommodation for three or more unrelated persons who share basic amenities. Individual flats therefore will typically not be considered to be HMOs unless they fall within the HMO definition.
- 1.3.4 Developments aimed explicitly and exclusively at students are addressed in the *Student Accommodation SPG* (2018).

2 Planning Policy Context

2.1 National Policy

2.1.1 Planning Policy Wales (Edition 9, 2016) sets out land-use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs). Procedural advice is given in circulars and policy clarification letters.

2.1.2 Paragraph 3.1.4 states:

Factors to be taken into account in making planning decisions (material considerations) must be planning matters; that is, they must be relevant to the regulation of the development and use of land in the public interest, towards the goal of sustainability. The planning system does not exist to protect the private interests of one person against the activities of another. Proposals should be considered in terms of their effect on the amenity and existing use of land and buildings in the public interest. When determining planning applications local planning authorities must take into account any relevant view on planning matters expressed by neighbouring occupiers, local residents and any other third parties. While the substance of local views must be considered, the duty is to decide each case on its planning merits.

2.1.3 In terms of conversions of and for housing, Paragraph 9.2.6 states:

Local planning authorities should address the scope and potential for rehabilitation, conversion, clearance and redevelopment when considering suitable sites for housing development. Maximising the use of suitable previously developed land for housing development can assist regeneration and at the same time relieve pressure for development on greenfield sites. In particular, local authorities should consider the contribution to the overall provision of land for housing that can be made by reclaimable or reclaimed urban land and by disused or underused buildings. Sites which are no longer likely to be needed for office or industrial purposes may also be appropriate locations for housing.

2.1.4 Paragraph 9.3.3 states:

Insensitive infilling, or the cumulative effects of development or redevelopment including conversion and adaptation, should not be allowed to damage an area's character or amenity. This includes any such impact on neighbouring dwellings, such as serious loss of privacy, or overshadowing.

2.1.5 In the Planning Use Class systems, flats and houses are usually classed as C3 Dwelling houses. As stated in 1.3.3, certain developments of flats can be identified as C4 developments; they are for three or more unrelated persons, forming a House in Multiple Occupation.

2.2 Local Policy

2.2.1 The Cardiff Local Development Plan (LDP) 2006-2026 was adopted in January 2016. The principle of maximising the use of existing dwellings is established with one of the 4 key objectives is 'To respond to evidenced social needs' within this it is stated:

C. [LDP Objective]To maximise the use of the existing building stock through refurbishment, retro-fitting and empty homes initiatives

2.2.2 Policy H5 in the LDP refers explicitly to the sub-division of conversion of residential properties. This is outlined below. Several other policies are also applicable to flat conversions and will be referenced throughout this SPG. Unless stated otherwise, policies noted within this SPG will refer

to those stated in the LDP. Developments of HMOs should refer to the HMO SPG (2016)

Proposals for any conversion to flats or Houses in Multiple Occupation will be permitted where:

- i) The property is of a size, whereby the layout, room sizes, range of facilities and external amenity space of the resulting property would ensure an adequate standard of residential amenity for future occupiers.*
- ii) There would be no material harm to the amenity of existing, nearby residents by virtue of general disturbance, noise, or overlooking.*
- iii) The cumulative impact of such conversions will not adversely affect the amenity and/or character of the area.*
- iv) Does not have an adverse effect on local parking provision.*

2.2.3 Policy H2 references conversions to flats above commercial premises within the Central Business Area of the city centre, District centres and Local centres. Policy H2 states:

The conversion of suitable vacant space above commercial premises to residential use will be favoured where:

- i) Adequate servicing and security can be maintained to the existing commercial use(s)*
- ii) Appropriate provision can be made for parking, access, pedestrian access, amenity space, and refuse disposal together with any appropriate external alterations and;*
- iii) The residential use does not compromise the ground floor use.*

2.2.4 The *Cardiff Residential Extensions and Alterations SPG (2017)* outlines key principles in terms of design and the potential impact of the development on surrounding properties. In particular, section 7 outlines the impact of Extensions which may be a feature of some flat conversions. The key listed Design principles are as follows and expanded upon in more detail in the SPG.

- Be subordinate to the original dwelling*
- Avoid blocking natural light and outlook to habitable rooms in neighbouring properties*
- Avoid reducing garden space to an unreasonable small size*
- Consider the impact on trees within or adjacent to the site*

2.2.5 Affordable Housing contributions are requested for developments of five or more dwellings, or for developments on sites exceeding 0.1 gross hectares. This, and other planning contributions are expanded upon in Section 6

2.3 Listed Buildings and Conservation Areas

2.3.1 Owners of properties that have been listed by Cadw for their special architectural or historic interest, or are in a conservation area should seek additional advice prior to contemplating conversion to flats. Many alterations or associated facilities (such as bin stores, roof lights or dormer windows) that often form part of flat conversions, may require planning permission or listed building consent (LBC) and will be less acceptable within designated historic areas than elsewhere in the city.

2.3.2 Proposals in conservation areas are required to preserve or enhance the character or appearance of the area, as set out in policies KP17 and EN9 of the LDP. Specific advice regarding each conservation area is available on the Council's website www.cardiff.gov.uk/conservation. The location of conservation areas and listed buildings can also be checked on the website.

3 Space Standards

- 3.1 Space standards refer to the ambition to see adequate space provided to future residents to ensure accommodation is of a high quality and affords space for living. Policy H5 of the LDP states:

Proposals for any conversion to flats or Houses in Multiple Occupation will be permitted where:

- i) *The property is of a size, whereby the layout, room sizes, range of facilities and external amenity space of the resulting property would ensure an adequate standard of residential amenity for future occupiers.*

This policy forms the basis that seeks to achieve a minimum size for newly converted flats in order to provide good amenity to current and future users. Unlike England and across all London boroughs, Wales has no national space standards, but various attempts at standards have been historically applied within the British planning system, and these are presented in Appendix B.

- 3.2 Hitherto, Cardiff Council has had no space standards for each converted residential unit, but has typically sought to approve flats where they are larger than 30m², based on the 1961 Parker Morris standards. Above this size, the Council currently make no provision for the number, or size of bedrooms and in light of the above LDP policy it is deemed appropriate to provide a definition of 'adequate standard of residential amenity' for developers to adhere to. The following standards are expected:

Number of Bedrooms	Minimum Flat Size in GIA
Studio Flat	30m ²
1 Bedroom	35 m ²
2 Bedroom	45 m ²
3 Bedroom	55 m ²
4 Bedroom	65 m ²

These standards take account of alternative space standards used elsewhere in the country, but are adapted to the practical needs of Cardiff, the city's housing types, projected population growth and need to maintain a buoyant housing supply at all price ranges. See Appendix A for more information

- 3.3 These standards will be expected to be delivered unless it can be demonstrated that there are exceptional circumstances in terms of wider planning benefits, such as bringing a derelict listed building into beneficial use.

4 Design and Accommodation Amenities

4.1 This part of the SPG presents design guidance for flat conversions above and beyond the principles on space standards stated in Section 3.

4.2 Room Sizes and Facilities

4.2.1 Within the confines of the space standards outlined in 3.2, the council would not seek to be prescriptive in terms of individual room sizes. However, applicants are reminded of the council's Licensing standards, replicated in Appendix C and which in addition to the total flat space standards, offer guidance and best practice on suitable sizes for individual rooms.

4.2.2 In terms of ceiling heights, a height appropriate for a good standard of living must be demonstrated as part of the application. In respect of loft conversions, habitable room space that contributes towards the space standards outlined in 3.2 is only counted as that which has a ceiling height above 1.5m. A minimum of 2m headroom must be provided above stairwells which is measured vertically from the pitch line of the stairs.

4.3 Recycling and Storage

4.3.1 Adequate provision must be made for waste, recycling and composting facilities. Policy W2 (Provision for Waste Management Facilities in Development) of the LDP states:

Where appropriate, provision will be sought in all new development for facilities for the storage, recycling and other management of waste

4.3.2 The *Waste Collection and Storage Facilities SPG* (October 2016) outlines key principles that developments must achieve in terms of waste and recycling. For houses being converted into flats, the preferred option is individual bin allocation, managed by each flat. Each flat would be allocated:

- 140L wheeled bin or bags (equivalent to 140L) for general waste
- 25L kerbside caddy for food waste
- Green bags for recycling

There is also the option for communal bins where space is limited.

4.3.3 The table below shows the bin provision of smaller wheeled bins for converting flats.

Number of Flats	Recycling (L)	General (L)	Garden* (L)	Food** (L)
3	bags	1 x 240L and 1 x 140L	240L	1 x 25L
4	bags	2 x 240L	240L	2 x 25L
5	bags	3 x 240L	240L	2 x 25L
6	bags	3 x 240L and 1 x 140L	240L	240L
7	bags	4 x 240L	240L	240L
8	bags	4 x 240L and 1 x 240L	240L	240L
9	bags	5 x 240L	240L	240L

For large developments of purpose built flats or apartments please see table below.

Number of Flats	Recycling (L)	General (L)	Garden* (L)	Food** (L)	Reuse/Bulky Storage
5	660	660	-	240	-
10	1100	1100	-	240	5m ²
15	2200	2200	-	240	5m ²
20	2200	2200	-	240	5m ²
25	3300	3300	-	480	5m ²
30	4400	4400	-	480	5m ²
35	4400	4400	-	480	5m ²
40	5500	5500	-	480	5m ²
45	6600	6600	-	720	10m ²
50	6600	6600	-	720	10m ²

4.4 Amenity Space

- 4.4.1 Amenity space is important in retaining a quality of life for people within converted dwellings, and to a lesser extent those who live nearby. Amenity space can perform many different functions, such as a secure playing space for children, a horticultural area, a place for drying clothes, or for sitting out in. Policy H5 in the LDP references the importance of external amenity space for future occupiers of converted flats. The full text of the policy is listed in 2.2.2.
- 4.4.2 Ground floor (or roof terrace) amenity space for flat conversions is different to amenity space for C3 dwellings or for HMOs, as it is less likely that upper floor residents would have direct access to any ground floor amenity space in converted flats. The council would favour developments that make every effort to provide access to external amenity space to as many dwellings as possible within the converted building. However, it is recognised that this may not always be viable, or desirable, and that a range of flats, some with sole access to amenity space, some with shared access and some with no access, is a matter for individual residents in choosing where to live. Amongst other considerations, a family dwelling on the ground floor with sole access to the amenity space can on balance be more beneficial than the same space being *accessed* by all flats within the building.
- 4.4.3 Amenity space can also exist in terms of balconies. Balconies on upper floors, if overcoming any overlooking concerns, can help to mitigate for any lack of access to ground floor amenity space. Sections 8.27 – 8.29 of the *Cardiff Residential Extensions and Alterations SPG (2017)* provides principles for provisions of balconies. Balconies may be particularly beneficial for units with no ground floor amenity space access.

4.5 Parking

- 4.5.1 The impact of parking is a key local issue with all residential development. This is especially the case with flat conversions where there can be a heightened perception of the impact that this type of development can have on often limited street space. As such car parking provision should be effectively incorporated into the design of the development. Policy H5 of the LDP states:

Proposals for any conversion to flats or Houses in Multiple Occupation will be permitted where:

- iv) *It does not have an adverse effect on local parking provision.*

In respect of this, reference should be made to the Council's parking standards, which are set out in the *Managing Transport Impacts and Parking Standards SPG*, which provides guidance on car, cycle, motorcycle and disabled parking provision, layout and design. The above SPG notes in 6.13:

Changes of use involving the subdivision of properties to create additional units can potentially result in the intensification of use and an increase in the level of demand for car parking. In areas

where there is a high concentration of single dwellings that are in multiple occupation, or have been subdivided into multiple flat/bedsit/apartment units, levels of on-street parking may already be oversubscribed. In locations where these circumstances exist, proposals for the further subdivision of existing dwellings will need to be carefully considered in light of the likely impacts of any intensification upon existing parking pressures. In exceptional circumstances, the likely parking impacts of a proposal may warrant a flexible application of the standards in this SPG with the effect that permission may not be granted unless additional off street parking space can be provided within the curtilage of the building

4.5.2 The *Managing Transport Impacts and Parking Standards SPG (2018)* includes the table below, which outlines the maximum and minimum provisions for car and cycle parking for different types of developments. Flat conversions will typically fall under ‘all dwelling properties’, in the central area and ‘1 or 2+ bedroom dwelling properties’ in the Non-Central area. Minimum provisions are not provided for car parking spaces, and there is no maximum for cycle parking. For example, a house converted to three one-bedroom flats would have at least three cycle parking spaces. This is in order to encourage sustainable means of transport, in accordance with policy KP8 of the LDP. Cycle parking should be provided in suitably designed stores and not designed to be kept in corridors or other informal arrangement.

Area	Development Type	Maximum car parking spaces	Minimum cycle parking	Disabled Parking Provision
Central	All dwelling properties	1 per unit	1 per unit (house) 1 per bedroom (flat)	Provided in car parking allocation
Non Central	1 bedroom dwelling properties	1 per unit	1 per unit (house) 1 per bedroom (flat)	Provided in car parking allocation
	2+ bedroom dwelling properties	2 per unit	1 per unit (house) 1 per bedroom (flat)	

Central area as defined in *Managing Transport Impacts SPG (2018)*

4.5.3 In terms of standards of storage, the impact on proposed cycle storage on the street scene will be assessed on its merits. The *Managing Transport Impacts SPG* states in 6.22:

Residential and long stay cycle parking must be secure and sheltered. The shelter may be in the form of accommodation within buildings, in cycle sheds or other sheltered structures and can include cycle lockers or cages located in close proximity to the main building access. For houses, where cycle parking cannot be accommodated within individual dwellings (e.g. where garages and/or outside space are not available), appropriate alternative secure and sheltered provision should be made. It is often better to have several small groups of stands rather than one large facility. Cycle provision should be designed into a scheme from the outset to ensure adequate provision is made available from first occupation. Reference should be made to the Cardiff Residential Design Guide and other relevant guidance.

4.6 Noise, Light and Outlook

4.6.1 Design and layout of flat conversions should minimise the potential for noise nuisance. By definition, flat conversions bring different household units into closer contact with each other within the confines of existing building structures. This can result in greater conflict between residents within conversions, and also neighbours. For this reason the council strongly favour the ‘stacking’ of flats, whereby consistent room types are above each other when conversions occur, i.e. the kitchen of the first floor flat is above the kitchen of the ground floor flat. The council will carefully scrutinize arrangements between bedrooms and living spaces where there may be potential conflicts.

4.6.2 Effective sound insulation is important between adjoining flats/dwellings, and helps to mitigate against future noise disturbance and nuisance. Noise is a material factor which must be considered when applications are received. The specific details of sound insulation are not dealt with under

Planning legislation, instead the Building Regulations 2010 (as amended) identify this type of development as a 'material change of use' and makes specific requirements in respect of acoustic design under Part E of the Regulations. It is something which developers will need to consider in order to mitigate against future noise problems.

4.6.3 Privacy between flats in the same building and adjacent buildings is important. Rooms should be arranged in a manner that maximises the living standards of occupants whilst preventing the overlooking of neighbouring properties and avoiding bedrooms facing high boundary walls. This accords with Policy KP5 in the LDP.

4.6.4 All habitable rooms must benefit from natural light, ventilation and a means of outlook that should be onto streets or amenity spaces. *The Cardiff Residential Design Guide SPG (2017)* and LDP Policy KP5 offers a series of design principles on outlook, light and privacy.

4.7 Access

4.7.1 Flats that are above shops or offices should have their own separate access to the street frontage to avoid conflict with the commercial properties on the lower floor(s). If this is not possible, strong justification must be given for utilisation of shared entrances.

4.7.2 Access to the building should be through the front door with direct access from the street entrance as opposed to via the commercial area. Wider principles on conversions of spaces above commercial units is provided in Policy H2 of the LDP, which is presented in 2.2.3

4.7.3 Rear or side access should only be used as the primary access if it is well lit and already extensively used for this purpose. External staircases at the back of the building, via a back alley are not acceptable as the main access as they can cause a loss of privacy for neighbouring properties. This principle also applies to upper floor flats that are not above commercial premises.

4.8 External Alterations

4.8.1 The visual impact of any conversion on the external appearance of the property is a key issue, and consideration of this through good design must be considered. KP5 of the SPG states:

To help support the development of Cardiff as a world-class European Capital City, all new development will be required to be of a high quality, sustainable design and make a positive contribution to the creation of distinctive communities, places and spaces by:

- i) Responding to the local character and context of the built and landscape setting so that layout, scale, form, massing, height, density, colour, materials, detailing and impact on the built and natural heritage are addressed within development proposals.*

4.8.2 4.2 Presents guidance on ceiling heights and floor levels. If floor levels are altered, through the conversion to flats, the impact on the appearance from the street must be considered, with the lower floor level not visible to those using the street. This is best achieved by using obscured glazing. Additionally, in cases where it may be appropriate to split larger rooms into smaller rooms care must be taken to ensure that new windows align with the divided room. This is especially the case in traditional bay fronted properties, where it is not appropriate for two rooms to share the same window.

4.8.3 More generally, the *Cardiff Residential Extensions and Alterations SPG (2017)* provides guidance [for all development types] and outlines core planning principles that would also apply for the conversion to flats, including commentary on materials, density, colours and form.

4.8.4 Newly converted flats will need to have consideration in respect of designing out crime and the creation of safe environments. Applicants are encouraged to engage with Police Design Out Crime Officers and refer to secured by design principles, which can be found at www.securedbydesign.com. Policy C3 (Community Safety / Creating Safe Environments) of the LDP states:

All new development and redevelopment shall be designed to promote a safe and secure environment and minimise the opportunity for crime. In particular development shall:

- i) Maximise natural surveillance of areas which may be vulnerable to crime such as publicly accessible spaces, open space, car parking areas and footpaths*
- ii) Have well defined routes, spaces and entrances that provide convenient movement without compromising security*
- iii) Maintain perceptible distinction between public and private spaces through well-defined boundaries and defensible space.*
- iv) Provide a good standard of lighting to public spaces and routes while minimising energy use and light pollution; and*
- v) Be designed with management and maintenance in mind, to discourage crime in the present and future.*

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5 Loss of Family Homes and Other Uses

- 5.1 Cardiff has a housing shortage, and this includes the provision of family accommodation. There is a need for all sizes of family accommodation, both in the affordable and market housing sectors. Whilst it is recognised that conversions to flats can result in an increase of smaller, denser accommodation being provided, it can often be at the expense of family accommodation, as a larger single residential unit makes way for several smaller flats. A significant loss of family housing can erode the character of an area, including diluting mixed and sustainable communities, as outlined in Policy H5 of the LDP, and listed in 2.2.2.
- 5.2 In addition to maintaining a supply of family housing, the council needs to protect the character and amenity of an area. As such, where an existing C3 Use Class family home is lost to conversion, the council would favour the provision of a range of flat sizes, especially two bed flats, which are more versatile in terms of occupiers and can serve as small family accommodation. The most appropriate location for a two-bed flat is on the ground floor, which is typically better positioned to benefit from any ground floor amenity space. It is understood that in some cases a two bed flat may not be possible within the confines of an existing building, or without extensive, and possibly unacceptable, extensions.
- 5.3 The majority of flat conversions occur in buildings that had previously been residential. However, in many cases flats are developed in what may previously have been commercial or industrial spaces. This is particularly the case with larger developments of flats that may occur in what were previously office blocks, or industrial warehouses.
- 5.4 Given the greater prominence of larger conversions, and the principle of the change of building use, greater attention is needed to the design principles outlined within this SPG. LDP Policy EC3 Alternative Use of Employment Land and Premises, outlines some key principles in terms of the change *from* other uses, and policy H6 outlines the requirements for conversion *to* residential. EC3 states:
- Development of business, industrial and warehousing land and premises for other uses will only be permitted if:*
- i) The land or premises are no longer well located for business, industrial and warehouse use; or*
 - ii) There is no realistic prospect of employment use on the site and/or the property is physically unsuitable for employment use, even after adaptation/ refurbishment or redevelopment; or*
 - iii) There is no need to retain the land or premises for business, industrial or warehousing use, having regard to the demand for such land and premises and the requirement to provide for a range and choice of sites available for such use; and*
 - iv) There will be no unacceptable impact on the operating conditions of existing businesses.*
- 5.5 On occasions when the development may be acceptable, a contribution towards the provision of local training and employment may still be requested. This is contained in Section 7, alongside other developer contributions that may be required.

6 Planning Obligations (Developer Contributions)

- 6.1 New development often generates additional demands upon existing services, facilities, infrastructure and the environment. As identified in LDP Policy KP7, planning obligations will be sought to mitigate any impacts related to the proposed development, where they are:
- *Necessary to make the development acceptable in planning terms*
 - *Directly related to the development; and*
 - *Fairly and reasonably related in scale and kind to the development*
- 6.2 The following contributions may be sought, either through in-kind provision or by financial contribution, towards site specific infrastructure provision which is required as a result of the development, or where it is required to mitigate the impacts of development. Further details are provided in the *Cardiff Planning Obligations SPG(2017)*
- 6.2.1 **Affordable Housing:** LDP Policy H3 seeks 20% affordable housing on brownfield sites in all residential proposals that result in five or more dwellings, or sites of or exceeding 0.1ha in gross site area, or where adjacent and related residential proposals result in combined numbers or site size areas exceeding the above thresholds.
- 6.2.2 **Transportation and Highways:** Contributions may be sought towards specific measures in the immediate vicinity that may be required to enhance access to local facilities by sustainable modes (ie bus stop enhancements, cycling or walking routes). Developers will generally be expected to pay the costs of any new Traffic Regulation Orders (TRO) needed to accommodate the development.
- 6.2.3 **Functional Open Space:** A financial contribution towards functional open space will be sought on developments over eight units, and the provision of a minimum of 2.43ha of functional open space per 1000 projected population. For developments of 14 or more dwellings an element of on-site functional open space will be sought although it is recognised that this is less achievable for flat conversions and as such financial contributions may be sought in those instances too.
- 6.2.4 **Schools and Education:** A financial contribution towards school and education provision will be sought from residential developments where the site contains 80 or more flats, 13 or more houses, or an equivalent combination thereof (For this contribution only, 1 house is defined as equivalent to 5.43 flats).
- 6.2.5 **Community Facilities:** A financial contribution towards community facilities will be sought for any development of 25 or more flats.
- 6.2.6 **Public Realm, Community Safety and Public Art:** Where the need arises as a result of the development, provision of, or a contribution towards public realm, public art, or community safety measures in the vicinity of the site may be requested.
- 6.2.7 **Local Training and Employment:** As stated in 6.3, in circumstances where development proposals involve the loss of Class B1, B2 or B8 land and/or floorspace, a financial contribution towards bringing forward compensatory employment and training opportunities will be sought.

7 Appendices

7.1 Appendix A

An analysis has been made of 40 planning applications granted between 2015 and 2017, to ensure that the standards presented are in line with developments in Cardiff and are not unreasonable for the majority of schemes to be able to deliver. The 40 developments were all flat conversions that contained a variety of different sizes; studio, one-bed, two-bed and three-bedroom flats.

- The average size of studio flats / 1 bed flats was 37m²
- The average size of two-bed flats was 49m²
- The average size of three+ bedroom flats was 58m²

The minimum flat sizes outlined in 3.2 are designed to align with the above market expectations while ensuring that standards of flat accommodation are maintained and raised where necessary.

7.2 Appendix B

A justification for the space standards presented in 3.2 is given below. While this is only a guide to space standards, it should be noted that Cardiff Council have previously informally applied the Parker Morris standards, in seeking 30m² for flat conversions

	Flat Sizes				
	Studio	1 bedroom	2 bedroom	3 bedroom	4 bedroom
Ministry of Health Housing Manual 1949	27.9m ²	32.5 - 46.5m ²	65.0m ²	69.7 – 83.6m ²	88.3 - 92.9m ²
London Housing Standards (2016)	37-39m ²	50m ²	61-70m ²	74-95m ²	90-117m ²
	Flat Sizes				
	1 person	2 person	3 person	4 person	5 person
Parker Morris Standards (1961)	29.7m ²	44.6m ²	56.7m ²	69.7m ²	79m ²
Parker Morris Standards Amended (1967)	32.3m ²	47.4m ²	59.7m ²	73m ²	82.3m ²

7.4 Appendix C

The below information is replicated for guidance only, in order to demonstrate minimum standards of amenity space, as expected by Cardiff Council in licensed properties.

Cardiff Council Amenity Space Standard Table: Licensable properties

Required Amenities	Bedsits / flats
Personal Hygiene	
Bathrooms (This means a room containing a bath or shower, but not necessarily a toilet or wash hand basin).	1 bathroom for every 5 occupants. 1 to 5 occupants = 1 bathroom. 6 to 10 occupants = 2 bathrooms. 11 to 15 occupants = 3 bathrooms.
Water Closets (WC) (Toilets)	1 WC for up to 4 occupants (may be in bathroom/shower room) 1 WC per 5 occupants (in a separate compartment to the bath/shower) 2 WCs per 6 Occupants (may be in bathroom/shower room) 2 WCs per 7 occupants (with 1WC to be in a separate compartment) 3 WCs per 11-15 occupants (with 1WC to be in a separate compartment to the rooms containing baths/showers). * All W.C's must contain a WHB with hot and cold water
Kitchens	
Cooker	Minimum 2 hobs, oven & grill (May be a worktop appliance) per single person unit. Minimum 4 hobs, oven & grill per double person unit. (For flats with more than 2 occupiers, apply standard for Shared HMOs)
Sinks With permanent supply of hot & cold water and draining board.	1 per unit (For flats with more than 2 occupiers, apply standard for Shared HMOs)
Electrical sockets	Minimum requirement of 3 double sockets specifically for the kitchen area (may accept 2 double sockets in 1 person units). Additional sockets needed for cooker and refrigerator.
Worktop (Usually 600 mm deep)	2.0 linear metres per 5 occupants with an additional 0.5 linear metres for each extra person..
Food Storage	0.4 cubic metres dry goods per person (1 average cupboard). 0.1 cubic metres (100 litres) (3.5 cubic feet) combination of refrigerated and frozen food storage per person (this would normally mean one shelf in a fridge and one shelf in the freezer, per person).
Ventilation	Extractor fan (to outside air) to be provided with a minimum extraction rate of 30 litres/second if located near to the cooker or 60 litres/second if located elsewhere.

Space Standards

Example 1: Shared house of 3 or more occupants.

Kitchen:

7m² for up to 6 persons with 2.5m² per additional user. Not to be more than 1 floor away from any bedroom unless the property has a dining room or other eating area.

Bedroom:

Where a separate living room is provided:

Minimum 6.5m² for a single room

Minimum 11m² for a double room

Where no separate living room is provided:

Minimum 10.0m² for a single room

Minimum 15m² for a double room

Living room:

11.5m² for up to 6 persons with 2.5m² per additional person.

Example 2: Flat with combined lounge kitchen and a separate bedroom (Total of 2 rooms excluding bathroom)

Lounge – Kitchen:

10m² for 1 person or 13m² for 2 people

Bedroom: 6.5² for 1 person or 11m² for 2 people.

Example 3: Flat with combined lounge bedroom and a separate kitchen. (Total of 2 rooms excluding bathroom)

Lounge – bedroom: 10m² for one person 15m² for 2 people.

Kitchen: 5.5m² For up to 2 people.

Example 4: Flat/bedsit with combined lounge kitchen and bedroom (Total of 1 room excluding bathroom)

1 person unit = 13m²

2 person unit = 15m²

Example 5: Flat with separate lounge, separate bedroom/s , and separate kitchen.

Bedroom: 6.5m² for 1 person 11m² for 2 people

Lounge: 8.5m² For 1 person. 10m² for 2 persons and 11m² for up to 6people with an additional 2.5m² per person after this.

Kitchen: 5.5m² For up to 2 people. 7m² For up to 6 people with 2.5m² per additional person.

7.5 **Appendix D**

The following comments and responses provide a summary of the responses to the public consultation. The comments are not verbatim and reflect the thrust of responses to the SPG, rather than a comprehensive list of points made. The consultation ran from 20th September to 1st November 2018



Paragraph	Comment	Responses	Action
General	Welcome the SPG, but concerned by lack of reference to community safety.	A new section has been added (4.8.4) which addresses the several concerns made regarding community safety	SPG Amended
General	Concerns over the cumulative impact of flat conversions on local areas.	The SPG does not consider the cumulative impact, as there is no evidence that this is negative. Each application will be assessed on its own merits	No Change
2.2.2	Greater reference should be given to the HMO SPG.	Reference to the HMO SPG has been added	SPG Amended
3.2	Some concern that proposed flat space standards are too large and some comments felt they were too small.	We feel the balance is right in this regard	No Change
3.3	Concern that original wording regarding exceptional circumstances of some developments was not clear enough.	The wording in this section was clarified.	SPG Amended
4.3	Concerns about waste management issues.	This is referred to specifically in the Waste Management SPG, and is firmly reiterated within the SPG.	No Change
4.5	Concern that lack of minimum parking standards will exacerbate parking problems.	The SPG aligns with the Managing Transport Impacts SPG.	No Change
4.5	Suggestion to see cycle parking policies weakened, to take a pragmatic approach to cycle parking, particularly for flats on upper floors.	This is not appropriate, as policies are there for a purpose. This SPG provides opportunity to tighten up legislation in this regard.	No Change
5	Concerns that desires to see family accommodation may impact upon development.	A lack of family housing is a serious concern and the desire to see family suitable accommodation retained is important.	No Change