

# Housing Standards Review Consultation - Response Form

## How to respond:

Please respond by email to: [HousingStandardsReview@communities.gsi.gov.uk](mailto:HousingStandardsReview@communities.gsi.gov.uk).

Postal responses can be sent to:

Simon Brown  
Code for Sustainable Homes & Local Housing Standards  
Department of Communities & Local Government  
5 G/10, Eland House,  
Bressenden Place,  
London, SW1E 5DU

The closing date for responses is 5pm on 22 October 2013.

## About you:

First Name:	Philip
Last Name:	Haile
Position:	Volunteer
Name of organisation (if applicable):	Transition Bath
Address:	South Vaults Green Park Station, Bath, BA1 1JB
Email address:	consultation@transitionbath.org
Telephone number:	

- (i) Are the views expressed on this consultation an official response from the organisation you represent or your own personal views?

Organisational response

Personal views

**(ii) Are the views expressed on this consultation in connection with your membership or support of any group? If yes please state name of group:**

Yes

No

Name of group:

**Transition Bath**

(iii) Please tick the *one* box which best describes you or your organisation:

<b>Builders / Developers:</b>		<b>Property Management:</b>	
Builder – Main contractor	<input type="checkbox"/>	Housing association (registered social landlord)	<input type="checkbox"/>
Builder – Small builder (extensions/repairs/maintenance, etc)	<input type="checkbox"/>	Residential landlord, private sector	<input type="checkbox"/>
Installer / specialist sub-contractor	<input type="checkbox"/>	Commercial	<input type="checkbox"/>
Commercial developer	<input type="checkbox"/>	Public sector	<input type="checkbox"/>
House builder	<input type="checkbox"/>	<b>Building Control Bodies:</b>	
<b>Building Occupier:</b>		Local authority – building control	<input type="checkbox"/>
Homeowner	<input type="checkbox"/>	Approved Inspector	<input type="checkbox"/>
Tenant (residential)	<input type="checkbox"/>	<b>Specific Interest:</b>	
Commercial building	<input type="checkbox"/>	Competent Person Scheme operator	<input type="checkbox"/>
<b>Designers / Engineers / Surveyors:</b>		National representative or trade body	<input type="checkbox"/>
Architect	<input type="checkbox"/>	Professional body or institution	<input type="checkbox"/>
Civil / Structural Engineer	<input type="checkbox"/>	Research / academic organisation	<input type="checkbox"/>
Building Services Engineer	<input type="checkbox"/>	<b>Energy Sector</b>	<input type="checkbox"/>
Surveyor	<input type="checkbox"/>	<b>Fire and Rescue Authority</b>	<input type="checkbox"/>
<b>Manufacturer / Supply Chain</b>	<input type="checkbox"/>	<b>Other</b> (please specify)	<input checked="" type="checkbox"/>
		Sustainability Charity	

**(iv) Please tick the *one* box which best describes the size of your or your organisation's business?**

Micro – typically 0 to 9 full-time or equivalent employees (incl. sole traders)

Small – typically 10 to 49 full-time or equivalent employees

Medium – typically 50 to 249 full-time or equivalent employees

Large – typically 250+ full-time or equivalent employees

None of the above (please specify) Charity run by volunteers with 1000 'members'

**(v) Would you be happy for us to contact you again in relation to this consultation?**

Yes

No

DCLG will process any personal information that you provide us with in accordance with the data protection principles in the Data Protection Act 1998. In particular, we shall protect all responses containing personal information by means of all appropriate technical security measures and ensure that they are only accessible to those with an operational need to see them. You should, however, be aware that as a public body, the Department is subject to the requirements of the Freedom of Information Act 2000, and may receive requests for all responses to this consultation. If such requests are received we shall take all steps to anonymise responses that we disclose, by stripping them of the specifically personal data - name and e-mail address - you supply in responding to this consultation. If, however, you consider that any of the responses that you provide to this survey would be likely to identify you irrespective of the removal of your overt personal data, then we should be grateful if you would indicate that, and the likely reasons, in your response, for example in the comments box.

# Questions:

**Please note:** We very much welcome your views to help inform our decision on the way forward on standards. However, you are not obliged to answer every question. You can focus only on the sections that are most relevant to you.

## Introduction

<b>Q1</b>	Which of the options (A, B, or C) set out above do you prefer? Please provide reasons for your answers.
A <input checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>	
Comments: <p>We believe that a standard such as Code for Sustainable Homes should remain in order that Local Authorities, where viable can set higher standards. This will allow for special circumstances and provide potential for innovation. The government is currently proposing a 'lowest common denominator' approach which will limit innovation and make it more difficult for builders to acquire the necessary skills to meet the proposed 2016 Zero Carbon Standard, which we believe the large builders firms are already attempting to water down and delay. We believe that the current proposals are an attempt by the building industry to produce "homogeneous, pasteurised housing" as Eric Pickles was recently quoted as saying in the Telegraph (<a href="http://tinyurl.com/ly4bmds">http://tinyurl.com/ly4bmds</a>). We feel that it is particularly important to retain the energy components of Code For Sustainable Homes 5, until an equal (2016 building regs) or higher standard is delivered by government within a regulatory framework.</p> <p>We understand and support the government in its view that any local requirements should not act as impediments to housing land becoming available, but we believe this is unlikely to be the case in many local authorities where viability studies including the cost of Code for Sustainable homes is 'viable'. In Bath land values for recently sold brownfield sites have averaged £2.5million/hectare well above the HCA's benchmark £800,000/hectare land values.</p> <p>We are also concerned that the current building regulations relating to energy 2010/2012 Part L will be retained for a long time and that houses that are built to that standard will not be future proofed and will have to be retrofitted within 30 years to meet the UKs 2050 carbon reduction commitments.</p>	

<b>Q2</b>	Do you agree that there should be a group to keep the nationally described standards under review? Y/N.
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YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
<p>Comments:</p> <p>Market innovation and cost will continue to force the industry to adapt, a static standard is not acceptable.</p>	

<b>Q3</b>	<p>Do you agree that the proposed standards available for housing should not differ between affordable and private sector housing? Y/N.</p> <p>Please provide reasons for you answer.</p>
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
<p>Comments:</p> <p>The same standards are necessary otherwise some people will be treated unfairly and to some extent social rented housing could justify higher levels of sustainability if energy costs are reduced; social landlords could charge higher rents for properties with lower energy bills and although this arrangement if equally offset might not present immediate benefits to tenants it would insulate them from future volatility in energy prices.</p>	

<b>Q4</b>	<p>We would welcome feedback on the estimates we have used in the impact assessment to derive the total number of homes incorporating each standard, for both the “do nothing” and “option 2” alternatives. We would welcome any evidence, or reasons for any suggested changes, so these can be incorporated into the final impact assessment.</p>
<p>Comments:</p> <p>The impact assessment is very poor:</p> <ol style="list-style-type: none"> <li>1. It fails to assess the CO2 impact of the proposed changes: CfSH 5 offers a 60% reduction over 2010 Part L</li> <li>2. It fails to assess any economic benefit from the energy savings from CfSH homes - both to home occupiers and UK plc; reductions on energy costs of 36%, and 89% if FITs are included should be taken into account</li> <li>3. The monetised benefit of these savings are £10,000 or £17,000 if FITs are included versus the capital costs of the energy components of CfSH 5 of £7000</li> <li>4. The ECHarris cost impact analysis is 70% too high; EC Harris estimates the</li> </ol>	

extra over costs of a CfSH 5 home to be £16,500 versus recent studies by Transition Bath and AECOM/Element Energy for Bath and North East Somerset which are nearer £10,000. Use of horribly out of date solar panel costs at £2564/kWp versus current market of around £1,300/kWp, and expensive ground source heat pumps significantly overstates costs.

5. No discussion has taken place ability the advantages of the learning benefits of builders being forced to build to a higher energy standard - as a precursor to the 2016 Zero Carbon standard

To back up these claims we can provide on request:

1. a copy of the Transition Bath report calculating CfSH costs, economic and CO2 benefits (Aug 2013, 17 pages)
2. the B&NES/Element Energy/AECOM report which is essentially an update of their report of DCLG Aug 2011 on the cost of Code (Sep 2013)
3. A submission we have made to the Environmental Audit Committee which covers the above issues in more detail (7 pages)

## Accessibility – General questions

<b>Q5</b>	Do you agree that minimum requirements for accessibility should be maintained in Building Regulations? Y/N.
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
<p>Comments:</p> <p>It is important that disabled people are provided with as wide a choice of accomodation as possible and Local Authorities should not have to go through a complex justification process to require this. I would encourage you to watch this video:  <a href="http://www.bbc.co.uk/news/uk-england-20276168">http://www.bbc.co.uk/news/uk-england-20276168</a>  and read this article to illustrate the problem:  <a href="http://www.bbc.co.uk/news/uk-england-somerset-20270101">http://www.bbc.co.uk/news/uk-england-somerset-20270101</a>  In Bath it is not possible to retrofit many of its historic buildings, so building as many acessible new builds as possible will provide disabled people with more choice.</p>	

<b>Q6</b>	<p>a) Is up-front investment in accessibility the most appropriate way to address housing needs, Y/N.</p> <p>if Yes,</p> <p>b) Should requirements for higher levels of accessibility be set in proportion to local need through local planning policy? Y/N.</p>
A <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
B <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
<p>Comments:</p> <p>More houses than necessary should be built with higher standards than necessary to ensure disabled people have a wide choice of accomodation not just a minimum. An ageing population will also increase this requirement, and these homes need to be built today even if there isn't an immediate demand.</p>	



**Q7** Do you agree in principle with the working group’s proposal to develop a national set of accessibility standards consisting of a national regulatory baseline, and optional higher standards consisting of an intermediate and wheelchair accessible standard? Y/N.

YES  NO

Comments:  
Local Authorities should be able to propose what mix of these standards are required in a development and house builders should only have limited ability to challenge these, and not on cost grounds.

**Q8** Do you agree with the costs and assumptions set out in the accompanying impact assessment? Specifically we would like your views on the following:

a) Do you agree with the estimated unit costs of Life Time Homes? Y/N If not we would appreciate feedback as to what you believe the unit cost of complying with Life Time Homes is.

b) Do you consider our estimates for the number of homes which incorporate Life Time Homes to be accurate? Y/N If respondents do not consider our estimate is reasonable we would appreciate feedback indicating how many authorities you believe are requiring Life Time Homes standards.

**Wheelchair Housing Design Guide/standards:**

c) Do you agree with the figures and assumptions made to derive the extra over cost of incorporating Wheelchair Housing Design Guide? Y/N If not we would welcome feedback along with evidence so that we can factor this into our final analysis.

d) Do you have evidence of requirements for and the costs other wheelchair standards which we have not estimated? Y/N We would appreciate the estimated costs of complying with the standard and how it impacts properties.

e) Do you consider our estimates for the number of homes which incorporate wheelchair standards to be accurate (in the “do nothing” and “option 2” alternatives). Y/N. If you do not consider the estimate to be reasonable, please could you indicate how many authorities you believe require wheelchair standards.

A) YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments: General comment: this is not our area of expertise but the costs presented seem higher than presented in previous reports.	
B) YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	
C) YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	
D) YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	
E) YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q9</b>	Do you believe that the estimated extra over costs in the Impact Assessment reflect the likely additional cost of each level? Y/N
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

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<b>Q10</b>	Do you agree that level 3 properties should be capped in order to ensure local viability calculations remain balanced? Y/N  If yes, at what level should the cap be set?
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YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
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Comments:  This section of the consultation doesn't make sense. Why should there be a cap if the Local Authority a. demonstrates the need and b. demonstrates viability? We for example could envisage a centre of town development which is very accessible for disabled people, and in whose development the councils requires a high level of 'Lifetime Homes' and might offer the developer lower affordable homes targets in return for high 'Lifetime Home' targets - setting a cap would make this impossible and potentially force disabled people to live on unaccessible out of town sites. This suggestion in the consultation is poorly thought through.
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<b>Q11</b>	If a cap were to be adopted should it, in principle;  a) Vary across tenure?  b) Be flat across tenure?
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A <input type="checkbox"/> B <input type="checkbox"/>
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Comments:  Disagree with the cap as above
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<b>Q12</b>	To what extent would you support integration of all three levels of the working group's proposed access standard in to Building regulations with higher levels being 'regulated options'? Please provide reasons for your answer if possible.  a) Fully support. b) Neither support or oppose. c) Oppose.
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A  B  C

Comments:

Having clear regulatory standards makes it easier for Local Authorities to specify and reduces the learning curve builders face when developing homes.

## Accessibility – Technical questions

<b>QA1.1</b>	<p>Would you support the proposed changes to these aspects of guidance? Y/N.</p> <p>In your view, would introducing these requirements increase cost over and above that within the current AD M of the Building Regulations- please provide reasons for your answer.</p>
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>QA1.2</b>	<p>Would you support the inclusion of guidance non car parking for all dwellings as set out in the consultation standard? Y/N.</p> <p>In your view, would introducing these requirements increase cost to industry - please provide reasons for your answer.</p>
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>QA1.3</b>	<p>Would you support inclusion of requirements for external lighting and covered communal entrances? Y/N.</p> <p>In your view, would introducing these requirements increase cost to industry - please provide reasons for your answer.</p>
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>QA1.4</b>	<p>Do you think that including this guidance for lobbies in all dwellings would be helpful? Y/N.</p> <p>Would introducing these requirements increase cost to industry - please provide reasons for your answer.</p>
<p>YES <input type="checkbox"/> NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>QA1.5</b>	<p>Do you agree that the lift size set out in the technical standard reflects current industry practice? Y/N.</p> <p>Would introducing these requirements increase cost to industry - please provide reasons for your answer.</p>
<p>YES <input type="checkbox"/> NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>QA1.6</b>	<p>Do you agree that it is appropriate to require a minimum width of 850mm in all new homes? Y/N.</p> <p>Would introducing these requirements increase cost to industry - please provide reasons for your answer.</p>
<p>YES <input type="checkbox"/> NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>QA1.7</b>	<p>Do you agree that it is appropriate to amend guidance on hall and landing widths? Y/N.</p> <p>Would introducing these requirements increase cost to industry - please provide reasons for your answer.</p>
<p>YES <input type="checkbox"/> NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>QA1.8</b>	<p>Would you support this simplification measure? Y/N.</p> <p>Please give reasons for your answer being clear whether you think that this could add cost to home builders.</p>
<p>YES <input type="checkbox"/> NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>QA1.9</b>	<p>Do any other elements of the working group's suggested technical standard increase requirements above current regulatory minimum? Y/N.</p> <p>Please give reasons for your answer being clear whether you think that this could add cost to home builders and in particular in relation to reworded guidance on the following:</p> <ul style="list-style-type: none"> <li>• Approach routes</li> <li>• External steps</li> <li>• Communal Approach route</li> <li>• Communal entrance doors</li> <li>• Private entrance</li> <li>• Hall and landing widths</li> <li>• Clear access zones and route</li> <li>• Consumer units</li> </ul>
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YES  NO

Comments:

**QA1.10** Are the working group's proposed performance requirements for level 1 of the standards pitched at the right level?

Please indicate which of the options below you agree with.

- a) they go too far, and should be reduced
- b) they are about right
- c) they don't go far enough

A  B  C

Comments:

**QA1.11** If you do not entirely agree (ie your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).

Comments:

**QA1.12** Do you agree that it would be beneficial for the structure, definitions, terminology and diagrams common to all three levels to be reflected in an updated version of Approved Document M (Access to and use of buildings) of the Building Regulations? Y/N

YES  NO

Comments:



<b>QA1.13</b>	Do you agree that level 2 properties should provide step free access and key facilities at ground level? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>QA1.14</b>	<p>Are the working group's proposed performance requirements for level 2 of the standards pitched at the right level? Please indicate which of the options below you agree with.</p> <p>a) they go too far, and should be reduced  b) they are about right  c) they don't go far enough</p>
A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>	
Comments:	

<b>QA1.15</b>	If you do not entirely agree, (ie your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).
Comments:	

<b>QA1.16</b>	<p>Are the working group's proposed performance requirements for level 3 of the standards pitched at the right level? Please indicate which of the options below you agree with.</p> <p>a) they go too far, and should be reduced  b) they are about right  c) they don't go far enough</p>
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A  B  C

Comments:

**QA1.17** If you do not entirely agree, (ie your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).

Comments:

**QA1.18** Do you agree that improved evidence of wheelchair users housing needs is necessary? Y/N

YES  NO

Comments:

**QA1.19** If DCLG was to lead on this research, would you or your organisation be able and willing to collaborate in such a project? Y/N

YES  NO

Comments:

**QA1.20** Do you agree with the working group's proposed differentiation between wheelchair accessible and wheelchair adaptable housing? Y/N

YES  NO

Comments:

## Space – General questions

<b>Q13</b>	Would you support government working with industry to promote space labelling of new homes? Y/N
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments: <p>This whole consultation on space is a cop out - the discussion on space standards and not the labelling of such standards should have been included in the consultation. The consultation overstates the complexity of specifying minimum standards; on one hand the builders can argue for a rationalisation of standards and then when it suits them argue that nationwide space standards should not be implemented. Clearly home occupiers are dissatisfied with the current space provision in new builds and would prefer the space standards available in pre-1970 homes, but builders are not offering these. Reducing the size of homes makes them less future proof and makes them more difficult to adapt to future needs?</p> <p>"Large parts of the home building industry take the view that market forces function effectively in ensuring that essential consumer interests are well served "</p> <p>We suspect the builders view doesn't align well with that of house purchasers, I think most consumers would state the building industry does not service their needs well</p> <p>"Overall, it is clear that in many respects the market is performing well in the absence of national space standards "</p> <p>This statement is highly complacent and doesn't effect the reality and backs up the notion that this consultation is largely for the benefit of builders and has very little to do with consumer needs.</p>	

<b>Q14</b>	Do you agree with this suggested simple approach to space labelling? Y/N.
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments:	

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<b>Q15</b>	If not, what alternative approach would you propose?
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Comments:
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<b>Q16</b>	Would you support requirements for space labelling as an alternative to imposing space standards on new development? Y/N.
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YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
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Comments: Better marketing information labelling the amount of space in the home is useful. But Britain has not been building enough homes for decades and therefore there is little choice in the new build housing market. We support space labelling but only together with a minimum space standard.
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<b>Q17</b>	Would you support the introduction of a benchmark against which the space labelling of new properties is rated? Y/N Please give reasons for your answer.
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments: We feel that prospective house purchasers are reasonably savvy and would be able to understand and compare floor areas of homes within their price range for themselves as long as they are prominently displayed with sales material. However the definition of a floor area needs tightening up, usable floor area should be specified.	

<b>Q18</b>	Which of the following best represents your view? Please provide reasons for your views.  a) Local authorities should not be allowed to impose space standards (linked to access standards) on new development.  b) Local authorities should only be allowed to require space standards (linked to access standards) for affordable housing.  c) Local authorities should be allowed to require space standards (linked to access standards) across all tenures.
A <input type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/>	
Comments:	

<b>Q19</b>	Do you think a space standard is necessary (when linked to access standards), and would you support in principle the development of a national space standard for use by local authorities across England? Y/N
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments: Yes – but it should go further.	

Transition Bath believe that all homes in England should meet minimum space standards and urge the Government to take action through this consultation. Britain has the smallest homes in Western Europe. A national space standard is necessary to ensure homes provide peace and privacy for children to study and play, room for families to grow and homes that are flexible enough to adapt to the needs of our ageing population.

Local authorities should be able to set space standards in order to improve new build homes in their communities. However, I believe that the most effective solution would be for a national space standard to be applied through building regulations so that it applies to all homes, in every location and type of housing.

<b>Q20</b>	Do you agree with the proposed limiting of the scope of any potential space standard to internal aspects only? Y/N
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments: Including external standards would be difficult as it is much more site dependent - for example inner-city high density sites are unlikely to offer large external areas whereas in greenfield sites there should be more potential.	

<b>Q21</b>	Do you agree that Space Standards should only be applied through tested Local Plans, in conjunction with access standards, and subject to robust viability testing?
YES <input checked="" type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments: Its might be reasonable that the government imposes a cap on the minimum space standard, clearly all the components of this consultation should be subject to Local Authority Viability Studies	

<b>Q22</b>	<p>Do you agree with the costs and assumptions set out in the impact assessment? We are particularly interested in understanding;</p> <p>a) Do stakeholders agree with our assumption that house builders are able to recover 70% of the additional cost associated with space in higher sales values?</p> <p>b) Do you agree with the extra over unit costs we have used for the current and proposed space standards? If you do not agree, could you provide evidence to support alternative figures for us to include in the final impact assessment?</p> <p>c) Do you agree with the proportion of homes we have estimated to have taken up space standards in the “do nothing” and “option 2” alternatives? If you do not agree, could you provide evidence to support alternative figures for us to include in the final impact assessment?</p> <p>Please provide reasons for your answers.</p>
<p>A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>Q23</b>	<p>If you do not agree with the costs set out in the impact assessment please state why this is the case, and provide evidence that supports any alternative assumptions or costs that should be used?</p>
<p>Comments:</p>	

<b>Q24</b>	<p>We also need to verify how many local authorities are currently requiring space standards, and what those space standard requirements might be. Can you identify any requirements for space standards in local planning policies? Please provide evidence or links where possible.</p>
<p>Comments:</p>	

<b>Q25</b>	Can you provide any of the following, (supporting your submission with evidence wherever possible)?
	<p>a) Evidence of the distribution of the size of current private and affordable housing development?</p> <p>b) Evidence of space standards required by local authorities stating what is required and by whom?</p> <p>c) Evidence of the likely cost impact of space standards?</p>
A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>	
Comments:	

<b>Q26</b>	What issues or material do you consider need be included in H6 of the Building Regulations, in order to address the issues identified above?
Comments:	

<b>Q27</b>	Do you agree with this approach to managing cycle storage? Y/N.
YES <input checked="" type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments:	
It is unclear from the consultation document what the approach is, however we feel that suitable cycle storage which meets a minimum national standard should be required on all new developments.	



## Space - Technical questions

<b>QA2.1</b>	Do you agree that any space standards, if adopted, should be co-ordinated with the requirements of relevant accessibility standards? Y/N
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>QA2.2</b>	Do you agree with Gross Internal Areas indicated at Level 1, 2 and 3, shown in Table A1-3? If not, please provide reasons for your answer. Y/N
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>QA2.3</b>	Do you think it is necessary to define minimum areas for bedrooms and do you agree with the areas for bedrooms indicated at Level 1, 2 and 3 in Table 2? Y/N
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>QA2.4</b>	Are the performance requirements for level 1 of the space standards proposed by the working group pitched at the right level? Please indicate which of the options below you agree with.  a) they go too far, and should be reduced b) they are about right c) they don't go far enough
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A  B  C

Comments:

**QA2.5** If you do not entirely agree (ie your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).

Comments:

**QA2.6** Are the performance requirements for level 2 of the space standards proposed by the working group pitched at the right level? YN Please indicate which of the options below you agree with.

- a) they go too far, and should be reduced
- b) they are about right
- c) they don't go far enough

A  B  C

Comments:

**QA2.7** If you do not entirely agree (ie your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).

Comments:

**QA2.8** Are the performance requirements for level 3 of the space standards proposed by the working group pitched at the right level? YN Please indicate which of the options below you agree with.

- a) they go too far, and should be reduced
- b) they are about right
- c) they don't go far enough

A <input type="checkbox"/>	B <input type="checkbox"/>	C <input type="checkbox"/>
Comments:		

<b>QA2.9</b>	If you do not entirely agree (ie your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).
Comments:	

## Security – General questions

<b>Q28</b>	<p>Do you support the view that domestic security for new homes should be covered by national standards/Building Regulations or should it be left to market forces/other?</p> <p>a) national standards/Building Regulations</p> <p>b) market forces/other</p> <p>Where possible, please provide evidence to support your view?</p>
<p>A <input checked="" type="checkbox"/> B <input type="checkbox"/></p>	
<p>Comments:</p> <p>But there is a conflict with 'G' values of Secure by Design windows which needs to be resolved</p>	

<b>Q29 – Part 1</b>	Do you think there is a need for security standards? Y/N
<p>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>Q29 – Part 2</b>	<p>If yes, which of the approaches set out above do you believe would be most effective to adopt (please select one only)?</p> <p>a): Option 1 – A baseline (level 1) standard and a higher (level 2) standard.</p> <p>b): Option 2– A single enhanced standard (level 2) for use in areas of higher risk only.</p>
<p>A <input checked="" type="checkbox"/> B <input type="checkbox"/></p>	
<p>Comments:</p> <p>The industry should be forced to continue to provide higher standards via regulation.</p>	

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<b>Q30</b>	If the level 2 standard is used how do you think it should be applied; a) On a broad local basis set out in local planning policy? Or b) On a development by development basis?
A <input type="checkbox"/>	B <input checked="" type="checkbox"/>
Comments: Security requirements are probably location dependent	

<b>Q31</b>	Do you believe that there would be additional benefits to industry of integrating the proposed security standards in to the Building Regulations as 'regulated options'? Y/N
YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Comments:	

<b>Q32</b>	If security standards are integrated in to the Building Regulations, would you prefer that; a) level 1 and level 2 become optional 'regulated options' for use by local authorities? Or b) level 1 be required as a mandatory baseline for all properties with level 2 a regulated option for use by local authorities?
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A <input type="checkbox"/> B <input type="checkbox"/>
Comments:

<b>Q33</b>	Do you agree with the overall costs as set out in the accompanying impact assessment? Y/N.  If you do not agree, then do you have evidence to support alternative figures?
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q34</b>	Do you agree that level 1 security reflects current industry practice? Y/N.  If you do not agree, then do you have evidence to support an alternative view?
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q35</b>	Do you agree with the assumptions used to derive the extra over cost of Secured By Design as set out? Y/N  If you do not agree, then do you have evidence to support alternative figures?
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments: They appear higher than previous studies	

<b>Q36</b>	<p>Do you agree with the number of homes which incorporate Secured By Design standards that have been used in the accompanying impact assessment? Y/N.</p> <p>If you do not agree, then do you have evidence to support alternative figures?</p>
<p>YES <input type="checkbox"/>    NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>Q37</b>	<p>Do you agree with the assumptions of the growth in the use of Secured By Design standards over the 10 years of the 'do nothing option' in the accompanying impact assessment? Y/N.</p> <p>If you do not agree, then do you have evidence to support alternative figures?</p>
<p>YES <input type="checkbox"/>    NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>Q38</b>	<p>Do you agree with the assumptions for the 'take up' of the proposed security standards in the accompanying Impact Assessment? Y/N.</p> <p>If you do not agree, then do you have an alternative estimate that can be supported by robust data?</p>
<p>YES <input type="checkbox"/>    NO <input type="checkbox"/></p>	
<p>Comments:</p>	

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<b>Q39</b>	<p>Do you agree with the unit costs as set out in the accompanying impact assessment for the “do nothing” and “option 2” alternatives? Y/N.</p> <p>If you do not agree, please provide evidence to support alternative figures for us to include in the final impact assessment?</p>
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	



## Security – Technical questions

<b>QA3.1</b>	Are the performance requirements for the baseline security standard proposed by the working group pitched at the right level? Please indicate which of the options below you agree with.  a) they go too far, and should be reduced b) they are about right c) they don't go far enough
A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>	
Comments:	

<b>QA3.2</b>	If you do not entirely agree, (i.e. your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).
Comments:	

<b>QA3.3</b>	Are the performance requirements for the higher level of the security standards proposed by the working group pitched at the right level? Please indicate which of the options below you agree with.  a) they go too far, and should be reduced b) they are about right c) they don't go far enough
A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>	
Comments:	

<b>QA3.4</b>	If you do not entirely agree, (ie your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).
Comments:	

## Chapter 4: Water efficiency

<b>Q40</b>	Do you agree a national water efficiency standard for all new homes should continue to be set out in the Building Regulations? Y/N.
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q41</b>	Do you agree that standards should be set in terms of both the whole-house and fittings-based approaches? Y/N.
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q42</b>	Do you agree that the national minimum standard set in the Building Regulations should remain at the current Part G level? Y/N. (see also Question 43)
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments: They should be set lower at 105 litres/person/day which can be achieved cheaply by careful use of fittings. However a number of recent papers suggest actual average usage may be higher than modelled usage for showers which might mean the estimates of whole house usage based on modelled shower usage might be wrong?	

<b>Q43</b>	Do you agree that there should be an additional local standard set at the proposed level? Y/N.
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments: We believe there should be national standards.	

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<b>Q44</b>	Do you agree that no different or higher water efficiency standards should be able to be required? Y/N.
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments:	

<b>Q45</b>	Would you prefer a single, tighter national baseline rather than the proposed national limit plus local variation? Y/N.
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments: 105 litres/person/day with national standard	

<b>Q46</b>	Do you agree that local water efficiency standards should only be required to meet a clear need, following consultation as set out above and where it is part of a wider approach consistent with the local water undertaker's water resources management plan? Y/N.
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments: Overall we feel that higher standards should be required for water efficiency throughout the country as a precautionary risk basis against future climate change leading to long spells of dry weather. We think neither DCLG or the water providers are currently in a position to make this judgement about future water supply and therefore on a precautionary risk basis efficiency standards should continue to be increased.	

<b>Q47</b>	Should there be any additional further restrictions/conditions? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

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<b>Q48</b>	Do you agree with the unit costs as set out in the accompanying Impact Assessment for the “do nothing” and “option 2” alternatives? Y/N.  If you do not agree, please provide the evidence to support your alternative figures.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q49</b>	Do you agree with the number of homes which we estimate will incorporate the proposed tighter water standard in the accompanying Impact Assessment? Y/N.  If you do not agree, please provide the evidence to support your alternative figures.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q50</b>	Do you currently require through planning that new homes are built to a higher standard of water efficiency than required by the Building Regulations through:  a) a more general requirement to build to Code Level 3 or above? Or  b) a water-specific planning requirement? And  c) are you likely to introduce or continue with a water-specific water efficiency standard (beyond the Building Regulations) in the future?
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A <input type="checkbox"/>
B <input type="checkbox"/>
C <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/>
Comments:

## Water – Technical questions

<b>QA4.1</b>	<p>Are the proposed performance requirements for the higher level of the water standard pitched at the right level? Please indicate which of the options below you agree with.</p> <p>a) it goes too far, and should be reduced  b) it is about right  c) it doesn't go far enough</p>
A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>	
Comments:	

<b>QA4.2</b>	<p>If you do not entirely agree, (ie your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).</p>
Comments:	

## Chapter 5: Energy

<b>Q51</b>	The government considers that the right approach is that carbon and energy targets are only set in National Building Regulations and that no interim standard is needed. Do you agree? Y/N  If not, please provide reasons for your answer.
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YES  NO

Comments:

The current proposal means there will be a reduction in the standard Local Authorities can specify over and above minimum building regulation standards between now and whenever the 2016 Zero Carbon Standard is enacted. The risk is that this new standard will be delivered late and in a watered down state; the government's recent track record with 2013 part L demonstrates this - 6 to 12 months late and only a 6% rather than the originally proposed 40%. We have not confidence that the government nor the building industry will be able to deliver on time and to the current proposals.

We are therefore asking in the interim between now and when the Zero Carbon Standards come into force, that where viable Local Authorities are able to specify the energy component of Code for Sustainable Homes (CfSH) 5 and this should continue until the minimum building regulation standard matches this from a CO2 and energy consumption standpoint. This will have the additional benefit that builders will be able to continue to get more experience of a Zero Carbon Standard prior to it coming into force. We see the proposed 2016 Zero Carbon FEES Standard and CfSH 5 being very similar if not identical from a fabric perspective, the only difference being the use of on-site renewables versus Allowable Solutions

<b>Q52</b>	Are respondents content with the proposal in relation to each energy element of the Code for Sustainable Homes? Y/N.  If not, what are the reasons for wanting to retain elements? If you think some of these elements should be retained should they be incorporated within Building Regulations or set out as a nationally described standard. Please give your reasons.
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YES  NO

Comments:

It is not clear what the intent of this question is, but we feel the 'standards' should continue to adapt, so for example the changes in CfSH over time where high

efficiency lighting standards were dropped as a result of EU regulations phasing out incandescent bulbs was a not unreasonable change, in the same way that credits for real-time electricity and gas meters should be adapted whenever the UK adopts a smart metering standard. This adaptation should also for example consider providing an incentive to phase out halogen lighting which is current deemed 'efficient' in favour of LED lighting which is now cost effective and 6 times more efficient. Changing technology means that the standard will continue to have to adapt and incentives via CfSH-like credits should continue to be available.

We feel that retaining other components like drying space to reduce the use of energy hungry tumble dryings and provision of cycle storage will have significant benefits in reducing future energy use which has not been accessed in the impact statement.

**Q53** Do consultees agree with the number of homes we have estimated which currently have a renewable target and the costs associated with incorporating such a target? Y/N.

YES  NO

Comments:

The costs are completely wrong, and don't appear to reflect the current market. It appears, although it is not clear the costs of for example solar PV are based on the "May 2012 Parsons Brinkerhoff" report which appears to assume a cost of £2,400/kWp, the current market is between £1200/kWp and £1450/kWp, this is evidenced in 2 CfSH reports which we can provide a. the Transition Bath Aug 2013 CfSH cost report and b. the AECOM/Element Energy Sep 2013 CfSH cost report for B&NES and four other councils. DCLG should also refer to their own report, volume 4 of their CfSH Case Studies section 5.5 where the developer states costs of £1200/kWp:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/230271/Code\\_Case\\_Studies\\_Volume\\_4\\_-\\_final.pdf#page=32](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/230271/Code_Case_Studies_Volume_4_-_final.pdf#page=32)

Given the government and its consultants consistent inability to determine even current prices in areas where technology and costs are changing rapidly we feel that some form of scenario analysis should have been carried out as part of the impact statement which looks at the sensitivities of the costs of items which make a major contribution to the overall costs of Code for Sustainable Homes e.g. fabric insulation/glazing, solar PV, LED lighting, rainwater and greywater harvesting.

<b>Q54</b>	<p>Do you agree with the unit costs for the code set out in the accompanying impact assessment for the “do nothing” and “option 2” alternatives? Y/N.</p> <p>If you do not agree, please provide the evidence to support your alternative figures</p>
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YES  NO

Comments:

ECHarris's cost assessment is at least 60% too high as a result of the use of Ground Source Heat Pumps and likely out of date Solar PV prices (see above), we can provide better more up to date costs as stated in the previous question. CfSH 5 total costs should be between £9000 and £10,500 rather than EC Harris's stated £16,500 and the energy component should be between £6000 and £8000 rather than EC Harris's £11,500

<b>Q55</b>	<p>Do you agree with the proportion of homes we have estimated will incorporate the Code and the Planning &amp; Energy Act 2008 (aka Merton rule) over the next 10 years? Y/N.</p> <p>If you do not agree, please provide the evidence to support your alternative figures.</p>
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YES  NO

Comments:

<b>Q56</b>	<p>What are your views on the future of the Planning and Energy Act 2008 (“Merton’s Rule” type planning policies) in relation to the preferred Building Regulations only approach to energy standards?</p>
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Comments:

Local Authorities should be able to specify local requirements as long as they are justifiable via HCA type viability studies; this will lead to innovation in the building sector which simply won't happen with a single minimum standard.





## Chapter 6: Indoor environmental standards

<b>Q57</b>	Government is interested in understanding the extent to which daylighting in new homes is a problem, and the appetite for a daylighting design standard to be available to designers and local authorities.  a) Do you believe that new homes are not achieving a sufficient level of daylighting in habitable rooms? Y/ N. If so what evidence do you have that this is the case (please submit evidence as part of your consultation response)?  b) Do you think that it is desirable to consider having a national daylighting standard for use in the design of new homes? Y/N.
A) YES <input type="checkbox"/> NO <input type="checkbox"/>	
B) YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q58</b>	Do you agree that a review of simple percentage based methodologies should be undertaken to help determine if such an approach is fit for purpose? Y/N.  If you have any relevant research or evidence please submit this as part of your consultation response.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q59</b>	Do you agree that sunlighting should sit outside the scope of this review? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q60</b>	Do you agree that essential indoor air quality issues should be addressed through ongoing review of Part F (Ventilation) of the Building Regulations? Y/N.
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YES  NO

Comments:

Lower air permeability driven by the need to reduce energy demand suggests that MVHR should be mandated in new homes with air permeability below 5 m<sup>3</sup>/hr/m<sup>2</sup> @ 50 Pa, MVHR will future proof a home and is difficult to retrofit, Increasing levels of CO<sub>2</sub> and length of the growing season have led to a significant increase in respiratory diseases like hayfever, and this will only get worse with climate change; fitting MVHR with pollen filter will allow for future adaptation. In addition the authors believe that the current 'cheap' solution of installing trickle vents is inadequate, doesn't improve air quality significantly and increases the air permeability of buildings resulting in higher energy use which is not captured effectively in SAP. MVHR is difficult to retrofit because of difficulties feeding ductwork through joists which are not designed to support it.

## Chapter 7: Materials

<b>Q61</b>	Do you agree that materials standards are best left to the market to lead on? Y/N.
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments: Materials usage and standards should be regulated, the market i.e. builders left to their own devices will not promote good material standards.	

## Chapter 8: Process and compliance

<b>Q62</b>	Which of the above options do you prefer (1, 2, or the hybrid approach)? Please provide reasons for your answer.
1 <input type="checkbox"/> 2 <input type="checkbox"/> Hybrid <input type="checkbox"/>	
Comments: We feel that tiered national standards which local authorities can adopt are probably the most rational approach, but it is unclear whether mandated local planning standards related to higher standards are ever actually enforced by independent building control officers - there seems to be whole in the regulatory framework where there is a cross over between planning and building control regulations. We are concerned that although a form of 'tiering' has been included in this consultation, energy has specifically been excluded from this approach.	

<b>Q63</b>	Do you think that moving to a nationally consistent set of housing standards will deliver supply chain efficiencies to home builders? Y/N.  If yes, can you provide estimates and evidence of the level of efficiency that could be achieved?
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments: These figures are always going to be overstated by builders and would promote identikit housing with no reference to the local venacular. Overly consistent national standards will restruct innovation and experimentation. To quote Eric Pickles we need to stop "homogeneous, pasteurised housing" being built across the country'	

<b>Q64</b>	Do you think that moving to a nationally consistent set of housing standards could help reduce abortive or repeated costs during the construction stage of home building? Y/N.  If yes, can you provide estimates and evidence of the level of efficiency that could be achieved?
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments:	

Again we feel this issue is probably overstated by the building industry, there are only a few construction methodologies; masonry, timber frame, SIPs each of which is easily adaptable to meet higher levels of insulation - there should for example not be a significant cost to adding an extra 50mm of insulation to a fabric component.