

# 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:	Nishma
Last Name:	Malde
Position:	Head of Transport and Environment
Name of organisation (if applicable):	London Councils
Address:	59 1/2 Southwark Street
Email address:	dominic.curran@londoncouncils.gov.uk
Telephone number:	020 7934 9945

(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:

(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"/>
		Representative organisation for the London boroughs	

**(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)

☐

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

  

<b>Q2</b>	Do you agree that there should be a group to keep the nationally described standards under review? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

  

<b>Q3</b>	Do you agree that the proposed standards available for housing should not differ between affordable and private sector housing? Y/N.  Please provide reasons for you answer.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q4</b>	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.
Comments:	

## Accessibility – General questions

<b>Q5</b>	Do you agree that minimum requirements for accessibility should be maintained in Building Regulations? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q6</b>	a) Is up-front investment in accessibility the most appropriate way to address housing needs, Y/N.  if Yes,  b) Should requirements for higher levels of accessibility be set in proportion to local need through local planning policy? Y/N.
A <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/>	
B <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q7</b>	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 <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q8</b>	<p>Do you agree with the costs and assumptions set out in the accompanying impact assessment? Specifically we would like your views on the following:</p> <p>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.</p> <p>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.</p> <p><b>Wheelchair Housing Design Guide/standards:</b></p> <p>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.</p> <p>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.</p> <p>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.</p>
<p>A) YES <input type="checkbox"/>    NO <input type="checkbox"/></p>	
<p>Comments:</p> <p>No comment</p>	
<p>B) YES <input type="checkbox"/>    NO <input type="checkbox"/></p>	
<p>Comments:</p> <p>No comment</p>	



C) YES <input type="checkbox"/> NO <input type="checkbox"/>
Comments: No comment
D) YES <input type="checkbox"/> NO <input type="checkbox"/>
Comments: No comment
E) YES <input type="checkbox"/> NO <input type="checkbox"/>
Comments: No comment

<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: No comment	

<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?
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q11</b>	<p>If a cap were to be adopted should it, in principle;</p> <p>a) Vary across tenure?</p> <p>b) Be flat across tenure?</p>
<p>A <input type="checkbox"/>    B <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>Q12</b>	<p>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.</p> <p>a) Fully support.</p> <p>b) Neither support or oppose.</p> <p>c) Oppose.</p>
<p>A <input type="checkbox"/>    B <input type="checkbox"/>    C <input type="checkbox"/></p>	
<p>Comments:</p> <p>No comment.</p>	

## Accessibility – Technical questions

<b>QA1.1</b>	Would you support the proposed changes to these aspects of guidance? Y/N.  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.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

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

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

<b>QA1.10</b>	<p>Are the working group's proposed performance requirements for level 1 of the standards pitched at the right level?</p> <p>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>QA1.11</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:	

<b>QA1.12</b>	<p>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</p>
YES <input type="checkbox"/> NO <input type="checkbox"/>	
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 <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>
Comments:

<b>QA1.17</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>QA1.18</b>	Do you agree that improved evidence of wheelchair users housing needs is necessary? Y/N
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>QA1.19</b>	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 <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>QA1.20</b>	Do you agree with the working group's proposed differentiation between wheelchair accessible and wheelchair adaptable housing? Y/N
YES <input type="checkbox"/> NO <input type="checkbox"/>	
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 type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

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

<b>Q15</b>	If not, what alternative approach would you propose?
Comments:	

<b>Q16</b>	Would you support requirements for space labelling as an alternative to imposing space standards on new development? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<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 type="checkbox"/>	
Comments:	

<b>Q18</b>	<p>Which of the following best represents your view? Please provide reasons for your views.</p> <p>a) Local authorities should not be allowed to impose space standards (linked to access standards) on new development.</p> <p>b) Local authorities should only be allowed to require space standards (linked to access standards) for affordable housing.</p> <p>c) Local authorities should be allowed to require space standards (linked to access standards) across all tenures.</p>
A <input type="checkbox"/> B <input type="checkbox"/> C <input 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 type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<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 type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<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 type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<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>
A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>	
Comments:	
No comment.	

<b>Q23</b>	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?
Comments: No comment.	

<b>Q24</b>	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.
Comments:	

<b>Q25</b>	Can you provide any of the following, (supporting your submission with evidence wherever possible)?  a) Evidence of the distribution of the size of current private and affordable housing development?  b) Evidence of space standards required by local authorities stating what is required and by whom?  c) Evidence of the likely cost impact of space standards?
A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>	
Comments: No comment.	

<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 type="checkbox"/>	
Comments: Yes, as long as councils continue to have the ability to tailor standards to local circumstances. Cycle parking must be integral to the design of any development (no matter what the land use). In London, particularly central London, demand for cycle parking is increasing both within residential dwellings and commercial premises for staff. Kerb space is at a premium and there are ongoing issues with providing sufficient short-term cycle parking for visitors and relying on kerb space for long term parking is not practical. Continuing to include cycle parking within Local Development Plans will allow standards to be tailored to local circumstances where higher standards for particular land uses can meet demand and encourage more cycling	

## 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>	<p>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.</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 <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>
Comments:

<b>QA2.5</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>QA2.6</b>	<p>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.</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>QA2.7</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>QA2.8</b>	<p>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.</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 <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 type="checkbox"/>    B <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>Q29 – Part 1</b>	Do you think there is a need for security standards? Y/N
<p>YES <input 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 type="checkbox"/>    B <input type="checkbox"/></p>	
<p>Comments:</p>	

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

<b>Q31</b>	<p>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</p>
<p>YES <input type="checkbox"/>    NO <input type="checkbox"/></p>	
<p>Comments:</p> <p>No comment.</p>	

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

Comments:

No comment.

**Q33** 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 ☐ NO ☐

Comments:

**Q34** 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 ☐ NO ☐

Comments:

No comment

**Q35** 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 ☐ NO ☐

Comments:

<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> <p>No comment</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> <p>No comment</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> <p>No comment.</p>	

<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>
<p>YES <input type="checkbox"/>      NO <input type="checkbox"/></p>	
<p>Comments:</p> <p>No comment.</p>	

## 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"/>	
<p>Comments:</p> <p>Yes. However, this should be a floor, not a ceiling, and there should also be scope for local authorities to be able to set higher standards where there is scope to do so – for example, where the local development viability will support it. As with energy, developers are already achieving Code Level 4, equivalent to the proposed higher water efficiency standard, across London boroughs.</p>	

<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 type="checkbox"/> NO <input type="checkbox"/>	
<p>Comments:</p> <p>16. No comment</p>	

<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"/>	
<p>Comments:</p> <p>No. We would agree with the view expressed in the Challenge Panel paper that the 125l/p/d target is set too low at a 'lowest common denominator' and that a higher target of 110l/p/d (105l/p/d excluding allowance for external water use) is achievable without compromising the quality or functionality of potable water utility.</p> <p>We already know that southeast England is at high water stress, where demand exceeds supply, and is often the first area to require water restrictions. If the government sets a national standard that does not reflect this pressure on supply, in London and the South East we will be locking in a water standard for</p>	

dwellings that will require retrofitting to improve the local situation within the next few years. This will be more expensive, and will require funding by water companies and ultimately consumers.

**Q43** Do you agree that there should be an additional local standard set at the proposed level? Y/N.

YES ☐ NO ☒

Comments:

No. See response to Question 42 above.

**Q44** Do you agree that no different or higher water efficiency standards should be able to be required? Y/N.

YES ☐ NO ☒

Comments:

No. See response to Question 42 above.

**Q45** Would you prefer a single, tighter national baseline rather than the proposed national limit plus local variation? Y/N.

YES ☐ NO ☐

Comments:

We would prefer a single tighter baseline, plus the ability to set it higher where necessary. See response to Question 42 above.

**Q46** 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 ☐ NO ☐



Comments:

The higher standard should only be imposed where it can be demonstrated that there is a clear need. However, where local planning authorities have already included the higher water efficiency standard as part of their Code Level 4 requirement, they should not have to demonstrate this need again.

It is not clear what the requirement for the imposition of the higher standards to be “consistent with the local water undertaker’s water resources management plan” would mean. We seek further clarification on this.

**Q47** Should there be any additional further restrictions/conditions? Y/N.

YES ☐ NO ☐

Comments:

No comment.

**Q48** 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 ☐ NO ☐

Comments:

No comment.

**Q49** 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: No comment.	

<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?
A <input type="checkbox"/>	
B <input type="checkbox"/>	
C <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments: No comment.	

## Water – Technical questions

<b>QA4.1</b>	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.  a) it goes too far, and should be reduced b) it is about right c) it doesn't go far enough
A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>	
Comments:	

<b>QA4.2</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 5: Energy

<b>Q51</b>	<p>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</p> <p>If not, please provide reasons for your answer.</p>
<p>YES <input type="checkbox"/>    NO <input checked="" type="checkbox"/></p>	
<p>Comments:</p> <p>No. Although a nationally adopted standard could be acceptable, it must contain appropriate carbon and energy targets for London, based on current practice, rather than a single target set at the Building Regulations level.</p> <p>Paragraph 19 states that the review should not be just “a race to the bottom”, but this is precisely what is being proposed for energy, where only the current performance set in the Building Regulations will be allowable. As pointed out above, London boroughs requiring Code Level 4 are already securing developments that exceed this minimum level, without any evidence that such requirements are blocking development. In addition, from October 2013 the London Plan requires significant development to exceed Part L (2010) by 40% (between Code Level 4 and 5).</p> <p>As highlighted in the consultation document (paragraph 27) the problem with setting national standards is that the performance level set is most likely to be the lowest common denominator in order not to affect viability in the most marginal areas. The national target of 80% reduction by 2050 will require that the whole of the built sector to be carbon neutral by 2050. But the perceived need has to be tempered by viability, so we have seen successive roll-backs both in the definition of, and interim standards for, Zero Carbon Homes.</p> <p>The national Building Regulation Part L requirement has effectively been set at the minimum level of being viable for most marginal development areas. In areas of strong growth, where viability can support higher energy/CO2 performance, local planning authorities should be free to set higher levels without being required to demonstrate a local need for the higher level as long as the planning authority carried out robust viability</p>	

testing and local consultation. This has been already achieved by boroughs who have taken such policies through the production and adoption of their local plans.

The 2016 Zero Carbon target itself can be viewed as a “minimum” standard as unregulated emissions are excluded and developers will be able to offset a proportion of the remaining regulated emissions via the proposed Allowable Solutions scheme. The justification for excluding unregulated emissions is that policy on grid decarbonisation will deliver these reductions, however this policy is not progressing according to previously set timescales.

An important “local need” that planning authorities might seek to address by requiring higher levels of on-site or near-site energy reduction (e.g. by requiring equivalent of Code Level 5 or 6) is to limit the demand on existing stretched energy networks. This is already a problem for many inner London boroughs.

There is an important link here with the government consultation on Allowable Solutions. This proposes that there should be no “local first” approach to delivering the offset CO2 reductions. This means that where a development is only achieving minimum Carbon Compliance on-site, the Allowable Solutions is likely to be delivering energy reduction projects outside the borough area and hence also not contributing to lessening of the demand on the local infrastructure. While imposition of Code Level 6 could place unreasonable technical restrictions on developers, even if this became viable in cost terms, there should be scope for planning authorities to adopt policies to help minimise the pressure on local energy infrastructure by new build. A simple approach would be to allow prioritisation of locally raised Allowable Solutions funding for local demand reduction projects where these have been formally established.

The Government’s proposals may have a further unintended consequence of stalling housing developments which have previously been granted permission, if developers decide to apply for amendments to permissions to take advantage of the newly degraded standards.

<b>Q52</b>	<p>Are respondents content with the proposal in relation to each energy element of the Code for Sustainable Homes? Y/N.</p> <p>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</p>
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	within Building Regulations or set out as a nationally described standard. Please give your reasons.
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
<p>Comments:</p> <p>While some of the elements of the Code need updating (e.g. ENE6) and there may be a case for the consultation proposals relating to these elements, we would only support proposals to put ENE1 and ENE2 into Building Regulations, and in the interim into a future nationally described standard, should the flexibility of these be retained with London's current energy performance in mind. As noted above, many developments in London are already surpassing these standards and most developments that are referred to the GLA now comply with the 40% reduction standard compared with the 2010 Regulations.</p> <p>The report from the GLA into energy planning, monitoring the implementation of London Plan energy policies in 2012, published in July 2013, provides detailed analysis that highlights how the London Plan's policies are making significant headway in helping drive forward the development of more energy efficient, climate-friendly buildings in London.</p>	

<b>Q53</b>	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 <input type="checkbox"/> NO <input type="checkbox"/>	
<p>Comments:</p> <p>No comment.</p>	

<b>Q54</b>	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.
If you do not agree, please provide the evidence to support your	

	alternative figures
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments: No comment.	

<b>Q55</b>	Do you agree with the proportion of homes we have estimated will incorporate the Code and the Planning & Energy Act 2008 (aka Merton rule) over the next 10 years? 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: No comment.	

<b>Q56</b>	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?
Comments: We object to the amendment or removal of the Act. As highlighted above, a removal of the ability of local planning authorities to set energy requirements in planning policies (be it energy efficiency requirements or targets for renewable or low carbon systems) will lead to a dramatic fall in the energy standards secured in new homes and a backward step for London.	

## 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: No comment.	

<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: No comment.	

<b>Q59</b>	Do you agree that sunlighting should sit outside the scope of this review? Y/N.
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments: Yes; this should be dealt with through planning.	



<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.
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments: Yes – there is some support for this proposal, providing that the key issues are adequately addressed.	

## 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"/>	
<p>Comments:</p> <p>No. Addressing the embodied energy and sustainable sourcing of materials is an important part of taking a balanced approach to sustainable development and many local planning authorities have adopted the Code for Sustainable Homes to drive overall environmental performance. In London, the majority of councils require new developments to meet Code for Sustainable Homes Level 4 ensuring that new developments are inherently more sustainable</p> <p>The Code provides a flexible method whereby developers can select which of the optional areas of the Code to increase performance will deliver the required Code Level. It has a provision for developers to assess which points are most suitable to target, including a range of factors such as the cost of materials and the impact on the desirability and sale value of the finished homes. The Code therefore incentivises a holistic approach to sustainable design and construction whilst facilitating a market-led response to implementation of these principles.</p> <p>On a national level, the Code has resulted in materials manufacturers improving the sustainability and labelling of products. The materials standards in the Code for Sustainable Homes provide a tried and tested means for reducing the environmental impacts of materials (which can be a significant proportion of the lifetime CO2 emissions of a home) and securing responsible resourcing. While there may be scope to streamline the requirements, these standards should continue to be included in a national housing standards framework.</p> <p>In addition, materials are often required through the planning system to ensure that local design standards are achieved and a sense of place and neighbourhoods is delivered. This should not therefore be left to the market to deliver and will require planning input.</p> <p>Finally, the consultation document states (paragraph 273) that most private sector development is brought forward “outside the auspices of the Code”.</p>	

However, the Impact Assessment estimates (page 13) that around 50% of planning authorities require some level of Code compliance. So this private sector development is being brought forward under the Code. Hence, should the Code be withdrawn the important area of materials would no longer be addressed. The consultation document suggests that this area of environmental performance would automatically be driven by the market, but no compelling evidence is put forward to support this.

## 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:	

  

<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 type="checkbox"/>	
Comments:	

  

<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 type="checkbox"/>	
Comments: No comment.	