



Mr J Walker
Chief Executive
English Partnerships
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3 July 2007

Dear John

English Partnerships Quality Standards Review

At the HBF Liaison Group meeting on 31 May 2007 you tabled English Partnerships' proposed Quality Standards. It was agreed that HBF should be given time to consider the document and formulate a response based on feedback from the member companies present.

We thank you for this opportunity and attach our response.

We would welcome an early opportunity to discuss the contents further with you.

Yours sincerely

Stewart Baseley
Executive Chairman

Copies to:

Clive Fenton - Barratts
Malcolm Harris - Bovis
Stephen Stone - Crest
Bob Fidock - Gladedale
Tim Hough - Miller
Mike Farley - Persimmon
Neil Fitzsimmons - Redrow
Peter Redfern - George Wimpey
John Watson - Bellway

CONSULTATION RESPONSE



English Partnerships Quality Standards Review

21 June 2007

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Introduction

It is widely accepted that the UK must reduce its reliance on fossil fuels and cut its carbon dioxide emissions. The house building industry believes that it can play a leading role in achieving those goals.

It is also increasingly understood by a range of organisations that the aspirational move towards 'zero carbon' development by 2016 is dependent on future advances in technology that may not be available in the timescale.

If we are to achieve our objective of 200,000 "zero carbon" homes in 2016 it is essential that all parties fully understand what that will require.

We are therefore concerned that only a few months after the issue of the Code for Sustainable Homes, English Partnerships should be considering imposing additional duplicate or conflicting requirements.

There are difficulties with the technology that is currently available. Certain high profile "low carbon" sites cited as exemplars have been undermined by the poor performance of the technologies on which they based their claims.

Other, large-scale developments have achieved a definition of zero carbon without reliance on what are currently inefficient, expensive and unreliable micro technologies. They do this by improving the fabric of the building to reduce energy demand and installing a well-managed and maintained district CHP system, sized according to load requirements. However, these systems are also still experimental and unproven and certain customer/supplier issues remain unresolved.

On smaller developments (fewer than 800 units) reduced carbon emissions can **only** be achieved at present by reducing energy demand (by improving the fabric) and then incorporating small-scale electrical generating systems, which are at present costly, unreliable and inefficient. Also, their continued effective operation depends on maintenance being undertaken by homeowners or landlords. It is inevitable therefore that there will be reduction in efficiency and serviceability (and a range of health and safety issues). There will be a loss of consumer confidence, which is likely to result in increased resistance to such technology as we approach 2016.

Whilst efforts to improve Government targets are praiseworthy, there is a regrettable trend for some local authorities to adopt a "my area is greener than yours" stance that fails to balance what is technically and commercially viable at the moment and what

actually offers a long-term solution. HBF has argued for some years that ever more complex regulation is difficult enough without the proliferation of additional (and variable) standards being demanded by other bodies.

Many of the current renewable energy options are short-term fixes, and expensive and inefficient to boot. Erosion of the Government's original target dates is likely to result in expensive white elephants rather than a measured and real contribution to climate change and could put the 2016 target out of reach.

The task of meeting Level 3 of the Code is already onerous and it should not be forgotten that a key government objective is the provision of more affordable dwellings, not fewer and more expensive. The contribution that new build can make to the UK's targets is considerable but should not be overestimated and many more measures applied to existing buildings would be cheaper and longer lasting.

Looking at the specific proposals we would comment as follows:

Noise

Part E is already exceeded by the use of RDs as far as low frequency noise is concerned. There are technical problems with attempting to address higher frequency noise transmission.

Overheating

The CIBSE document is **Guide A** not Vol A and is intended primarily for commercial premises and workplaces. There are no plans to publish specialist domestic software. In addition our contact had no knowledge of EP's intention to incorporate their standards into the proposed assessment and was unaware of any consultation having taken place. There is therefore no mechanism by which we can assess how to meet the proposed standards.

CEEQUAL

This is the Civil Engineering Environmental Quality and Assessment Scheme. It is not a tool to assess housing development. Those aspects that do apply are duplicated by some of the requirements of the Code for Sustainable Homes.

Construction Efficiency

The proposed removal of the present requirement for 25% MMC may not have much impact, nor will the requirement for a **Statement of Construction Efficiency and Quality**. It is worth noting that the specification for MMC has proved onerous to meet in the past because of conflicting definitions.

Qualitative Assessment

Qualitative assessment will be undertaken on bids that pass certain objective standards criteria. These are an additional 'hoop'.

Objective National Standards

Most elements on the list are already covered with the exception of: -

Secure by Design, which is an aspect of the Code for Sustainable Homes

Building For Life (silver or gold) – a current EP requirement

Lifetime Homes which is also covered by the Code, though we would add that this leads to over-specification to allow for potential provision of facilities which may never

be required. It also has an impact on dwelling size and therefore on the density of the development. The concept of a “home for life” is deeply flawed.

Fire Statement- The arguments for and against the use of sprinklers were fully debated prior to the last revision to Part B of the Building Regulations and you may wish to consider the comments made by the LFCDA and others. There are insurance implications for the occupiers as well as other costs.

Transitional Arrangements

The document offers no indication of potential transitional arrangements. There are already sites being built to EcoHomes 2006, which may or may not reach Code Level 3 and any variations from the Code standards will have an impact on how we can measure compliance with the Code. The Code is intended to be national, though to date it only applies to England, and it seems illogical to build housing to different standards in different parts of the country.

Minimum Sizes

The proposed minimum size of dwellings is larger than that imposed by the Housing Corporation and is completely unrealistic given the current drive for higher density sites. Unless we abandon building houses in favour of high-rise blocks of flats, the amount of land released for housing would have to increase significantly if the number of dwellings to be built were not to decrease dramatically.

Conclusion

The variety of technical requirements that must be checked to comply with Code Level 3 is already extremely onerous. There seems no logical reason to attempt to vary the agreed staged targets on the path towards ‘zero carbon’ when all concerned agree that 2016 is an extremely challenging target.

I cannot over-emphasise the challenges that face us in the years ahead. If we are to achieve our target of 200,000 ‘zero carbon’ homes by 2016 it is essential that there is a clear and unambiguous path towards that target that all parts of the industry know and work towards. I am concerned that a profusion of ‘greener’ short term targets will obstruct our progress towards our 10 year goal and that an opportunity to make a real difference to the built environment and indeed the planet will be wasted.