

# 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:	John
Last Name:	Slaughter
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- (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 checked="" 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 type="checkbox"/>

**(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 checked="" type="checkbox"/>	
<p>Comments:</p> <p>But without any tiers. In the context of this consultation and in the absence of any substantiated market failure we cannot see any compelling justification for local standards in the areas considered under the review. We believe that the issues on which tiers have been proposed are better addressed by other market-led means.</p>	

  

<b>Q2</b>	Do you agree that there should be a group to keep the nationally described standards under review? Y/N.
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
<p>Comments:</p> <p>We see no justification in terms of the evidence adduced for any national standards outside those currently included in the Building Regulations. If such evidence is produced in future however, any resulting standards should be directly included in the Building Regulations and therefore considered by BRAC.</p>	

  

<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 checked="" type="checkbox"/> NO <input checked="" type="checkbox"/>	

Comments:

Any standards within Building Regulations under the option C approach should apply equally to affordable and private sector housing. However, this would not prevent the Government and HCA funding additional standards requirements through the National Affordable Housing Programme if there was a wish to do so as a public policy decision

<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.
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Comments:

We question the accuracy of the costs in the IA of this consultation on the basis that it is difficult to form a national cost when local planning authorities continue to set their own standards.

## 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"/>	
Comments: There is a need for robust evidence to prove whether or not current regulations are cost effective and adequate	

<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 checked="" type="checkbox"/>	
B <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments: We have considered these issues very carefully and have concluded that providing for tiered standards options above the minimum requirements of Part M is not the best approach. Experience shows both that there has been little use made in practice of key features built into Lifetime Homes (eg through floor hoists) provision and that existing standards are not well geared to the very individual requirements that people with disabilities have. We consider that an industry owned and led commitment to providing adapted designs where people require these would produce a better overall result than the approach proposed in the review.	

<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.
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YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
<p>Comments:</p> <p>Whatever standard is identified as a general necessity should be delivered through the Building Regulations but as argued on Q6 we have concluded tiered standards above Part M is not the best way forward.</p>

<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>
A) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	

<p>Comments:</p> <p>In reality the cost of meeting the Lifetime Homes standard is a lot higher than that stated in the IA. It would appear that the cost shown in the IA is based on the assumption that increased room sizes (space standards) have already been accepted. If this is the case, then the actual cost of Lifetime Homes has been misrepresented. The cost of Lifetime Homes without any minimum space standard is significant - estimated for example as some £2,500 for a smaller home.</p>
<p>B) YES <input type="checkbox"/> NO <input type="checkbox"/></p>
<p>Comments:</p> <p>cannot give a national response</p>
<p>C) YES <input type="checkbox"/> NO <input type="checkbox"/></p>
<p>Comments:</p> <p>cannot give a national response</p>
<p>D) YES <input type="checkbox"/> NO <input type="checkbox"/></p>
<p>Comments:</p> <p>cannot give a national response</p>
<p>E) YES <input type="checkbox"/> NO <input type="checkbox"/></p>
<p>Comments:</p> <p>cannot give a national response</p>

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

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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?
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments: Do not believe there is a case for a 'tiered' set of accessibility standards	

<b>Q11</b>	If a cap were to be adopted should it, in principle;  a) Vary across tenure?  b) Be flat across tenure?
A <input type="checkbox"/> B <input checked="" type="checkbox"/>	
Comments: See response to Q10	

<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.
A <input type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/>	
Comments: We do not believe that there is a case for a tiered set of accessibility standards. Varying levels within Building Regulations can lead to confusion as to what level is needed in any particular area. Better to have a single national Building	

Regulation level. House Builders can then respond to the specific needs of individual purchasers.

## 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>
<p>YES <input type="checkbox"/>    NO <input type="checkbox"/></p>	

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

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: Yes. This could be taken forward through a number of routes but must also include existing homes if it is to be a true consumer initiative	

  

<b>Q14</b>	Do you agree with this suggested simple approach to space labelling? Y/N.
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments: In principle, but need to discuss details of what should be provided.	

  

<b>Q15</b>	If not, what alternative approach would you propose?
Comments: No other alternative	

  

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

<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: The consumer bench marks this when purchasing. Their benchmark will also compare the whole market - new and second hand. A formal benchmark is also likely to be interpreted in practice as a proxy for a minimum space standard and therefore introduce a space standard throught the back door.	

<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 checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>	
Comments: A minimum space standard should not be allowed because it would have the perverse effect of making housing less affordable - particularly for first time buyers - and reducing housing supply in a context of insufficient overall land supply for housing. It is the lack of sufficient land for housing that makes space comparatively expensive to provide. A minimum space standard would simply cut some people out of the market and is not the answer.	

<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 checked="" type="checkbox"/>	
Comments:	

See answer to question 18

**Q20** Do you agree with the proposed limiting of the scope of any potential space standard to internal aspects only? Y/N

YES ☐ NO ☒

Comments:

Don't agree with space standards in any form and can see no compelling robust evidence for them.

**Q21** 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 ☐ NO ☒

Comments:

There should be no local space standards. Where is the robust evidence which shows we need these?

**Q22** Do you agree with the costs and assumptions set out in the impact assessment? We are particularly interested in understanding;

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?

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?

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?

	Please provide reasons for your answers.
A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>	
<p>Comments:</p> <p>There is no consideration here for the consumer who might be priced out of the market on certain houses. Whether or not 70% of the additional cost could be recovered is not the point. That cost could not be recovered from someone who is priced out in the process. We do not, however, see the evidence in any case for the assertion that 70% could be recovered within the Impact Assessment.</p>	

<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?
<p>Comments:</p>	

<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.
<p>Comments:</p> <p>Unable to provide any firm data, but we have seen signs of a number of local authorities looking to promote such requirements in emerging local plans recently.</p>	

<b>Q25</b>	<p>Can you provide any of the following, (supporting your submission with evidence wherever possible)?</p> <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>
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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: This is not a Building Regulations matter and requires further discussion with the LGA and others. We do not support the Code standards	

<b>Q27</b>	Do you agree with this approach to managing cycle storage? Y/N.
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments: Not a Building Regulation. Needs to be discussed as part of wider debate on transport and housing.	

## 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 <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> <p>NHBC Standards cover security and 80% of new build is built to this standard therefore neither A nor B</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 checked="" type="checkbox"/></p>	
<p>Comments:</p> <p>The market adequately provides this at the individual site level, as required. Where is the robust evidence that says new homes do not.</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>	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 type="checkbox"/>	
Comments: We do not support a level 2 standard. Where is the robust evidence supporting this level.	

<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 type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments: No, NHBC standards work sufficiently to not require this	

<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?
A <input type="checkbox"/> B <input type="checkbox"/>	
Comments: We have not answered A or B as the better solution would be for Building	

Regulations to adopt the the NHBC standards if there were to be any provision in Building Regulations. We do not, however, think a case has been made for doing so. We do not support a second tier option for use by local authorities.

**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:

**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>Neither - we have no way of verifying this.</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 checked="" 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> <p>We are unable to judge this in terms of information available to us.</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 checked="" type="checkbox"/></p>	
<p>Comments:</p> <p>We do not agree with the costs or assumptions proposed.</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"/>	
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 checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<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:  Water supply issues cannot be addressed through local authority specific planning policies. They are a matter of strategic investment and infrastructure maintenance across at least sub-regional areas if not whole regions. The significant consumer impact of any high level standard as a result of a local plan policy cannot be justified since this would be an ineffective way of promoting necessary infrastructure investment and maintenance. Water usage is	

determined by occupiers of the whole housing stock, not just new homes which add only 0.6 - 0.7% annually to the stock.

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

YES ☒ NO ☐

Comments:

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

YES ☐ NO ☐

Comments:

Would prefer existing level in Part G and normal future review processes for Part G. There is no justification for more than this.

**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:

Don't agree with premise. The issue is the need for a proper strategic approach to infrastructure investment and maintenance. It should be borne in mind that the industry also pays infrastructure charges to water companies which should be sufficient to support necessary investment relating to new development.

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

YES ☐ NO ☒

Comments:

Answered no as not too sure what this question is referring to

**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:

**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 ☐ NO ☒

Comments:

**Q50** 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: A combination of all are encountered.	

## 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>	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.
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments: This is clearly correct given the zero carbon homes policy objectives and the planned changes to Part L of the Building Regulations.	

  

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

  

<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 checked="" type="checkbox"/>	
Comments: Difficult to say	

<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>
<p>YES <input type="checkbox"/>    NO <input checked="" type="checkbox"/></p>	
<p>Comments:</p> <p>We are unable to provide comment as we do not have cost data available.</p>	

<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>
<p>YES <input type="checkbox"/>    NO <input checked="" type="checkbox"/></p>	
<p>Comments:</p> <p>Difficult to say</p>	

<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>
<p>Comments:</p> <p>They are out of date. It is the correct approach that Building Regulations should be the only approach to energy standards. In fact the Merton Rule requirements are by now complicating and confusing the focus on achieving the zero carbon standards. Any such local policies dilute and undermine successful achievement of the zero carbon policy and should not be allowed.</p>	

## 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 checked="" type="checkbox"/>	
B) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments: We do not have any evidence to suggest this is a problem	

<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 checked="" type="checkbox"/>	
Comments:	

<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:	

<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:	

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

## 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 checked="" type="checkbox"/> Hybrid <input type="checkbox"/>	
Comments: We must reiterate, however, that we do not believe there is a justification for any optional tiers of standard for local application in relation to the areas considered in the review.	

<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 checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments: Provided that the standards are in the form of national Building Regulations and that there are no additional tiers for local application. Having a single, agreed set of Building Regulations requirements will necessarily optimise innovation by promoting supply chain competition and economies of scale for the best solutions.	

<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: It is very difficult to quantify the benefit that might be achieved, but logical analysis points to the fact that avoiding a multiplicity of different local requirements will improve on-site efficiency and consistency of results, reduce costs and help increase output	

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