



## THE HOME BUILDERS FEDERATION

### **Consultation: The future of sustainable housing: creating a new standard.**

Further to your Consultation entitled 'The future of sustainable housing: creating a new standard' we would comment as follows:

We at the HBF remain committed to working with our members and others to create a policy framework that will support the home building industry in building good quality homes that respond to key sustainability challenges while meeting consumers' wishes and enabling the industry to increase supply to tackle our national housing crisis.

To that end we have worked hard with government and others on the Housing Standards Review (HSR) and also the housing and construction Red Tape challenge.

As I'm sure you are aware, this fundamental review looks at the building regulations framework and voluntary housing standards with a view to rationalising the large number of codes, standards, regulations and guidance that add unnecessary cost and complication to the house building process. A key objective is to enable home builders and their supply chains to focus more effectively on developing the best and most cost-effective means of achieving agreed key building performance requirements by ending the fragmentation of the market that stems from the current multiplicity of codes, standards, regulation and guidance. A simpler set of national regulations and standards on agreed sustainability and performance priorities will mean that the efficiencies arising from economies of scale can be harnessed in developing and rolling out the best innovations, products and techniques to meet these requirements.

It is also the intention to stop the duplication and contradictions within the many regulations, standards etc; that currently exist.

Many current Code standards duplicate policies set out under other regulatory regimes, or the National Planning Policy Framework – for example flooding, biodiversity, and ecology are covered by the Planning good practice guidance which was published on 6 March 2014.

The HSR looked at a wide range of areas in moving forward with the aim of continuing to deliver high quality, sustainable, safe and accessible housing for today's customers and future generations.

We were therefore surprised to see your current consultation which in many respects seems to attempt to reopen the good work being done by the government through the HSR and the housing and construction Red Tape challenge.

This is not to say the world stands still, but as we remain at the stage of considering the details of how to implement the broad decisions that have been taken in the HSR it is in our view at least very premature to propose looking at developing another new standard for housing at present.

More fundamentally, however, the note you have provided as a basis for your consultation does not start from any evidence that there is an identified need to create a further standard.

In addition, you suggest developing a fresh set of independent assessment and certification arrangements for any putative standard when the whole thrust of the HSR has been to simplify and reduce such arrangements, bearing in mind that every additional form of assessment arrangement is likely to add to industry costs and risks complicating and delaying construction. You also seem to envisage linking the use of the standard to other policy measures such as the government's plans for new garden cities, so recreating complexity or fragmentation in the marketplace.

Given all these considerations we would not support the development of a new standard at present and do not think that a convincing case has been made for doing so. There are many pressures on house builders at present and developing/creating more layers of standards would risk further hindering the government's objective of increasing the production of new homes.