

Housing Standards Review Consultation - Response Form

How to respond:

Please respond by email to: 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:	David
Last Name:	Hawkes
Position:	Policy & Sustainability Officer
Name of organisation (if applicable):	Chartered Institute of Building
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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:

Faculty of Building Control and Standards
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(iii) Please tick the *one* box which best describes you or your organisation:

Builders / Developers:		Property Management:	
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"/>	Building Control Bodies:	
Building Occupier:		Local authority – building control	<input type="checkbox"/>
Homeowner	<input type="checkbox"/>	Approved Inspector	<input type="checkbox"/>
Tenant (residential)	<input type="checkbox"/>	Specific Interest:	
Commercial building	<input type="checkbox"/>	Competent Person Scheme operator	<input type="checkbox"/>
Designers / Engineers / Surveyors:		National representative or trade body	<input type="checkbox"/>
Architect	<input type="checkbox"/>	Professional body or institution	<input checked="" type="checkbox"/>
Civil / Structural Engineer	<input type="checkbox"/>	Research / academic organisation	<input type="checkbox"/>
Building Services Engineer	<input type="checkbox"/>	Energy Sector	<input type="checkbox"/>
Surveyor	<input type="checkbox"/>	Fire and Rescue Authority	<input type="checkbox"/>
Manufacturer / Supply Chain	<input type="checkbox"/>	Other (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

Q1	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 checked="" type="checkbox"/> C <input type="checkbox"/>	
Comments: <p>National standards are essential if the UK is to comply with the previously announced timescale of meeting the 2016 zero carbon homes target. Where appropriate, standards should be brought into building regulations as soon as possible, but we appreciate that this may not be able to happen in all cases, which is why we have suggested option B as the most practical approach. This approach is within the aims of rationalisation that the Review set out initially, and we recognise that implementing everything within a short timescale is challenging, not just from a regulatory perspective, but also to provide the industry with a clear steer. However, as the Challenge Panel have rightly suggested, the government's self-imposed rule on regulation (i.e. 'one in, two out') should absolutely not be a valid reason to delay action or result in inaction; this Review is an opportunity to significantly, and sensibly, rationalise building regulations and standards, and should not be missed through self-imposed limits on introducing regulation.</p> <p>We suggest that the government publish a timescale early in 2014 for the changes and comply with it - this would demonstrate a firm commitment to move forward with this initiative. Our own suggestion is to look to finalise the national standards by 2015 in preparation for incorporation within the building regulations in 2016. We are happy to be involved in this as it develops.</p>	
Q2	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"/>	

Comments:

We would welcome a cross-industry group that also involves consumers and wider groups, independent to housebuilders, insurance companies, warranty providers etc., to monitor the new standards. Ideally this group should have representation from chartered professional bodies, such as ourselves, who have a commitment to operate for the public benefit.

Q3 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 NO

Comments:

One set of standards for all within the Building Regulations is the best approach. We recognise that in many cases it is likely that developers will go above and beyond minimum standards for affordable housing anyway based on needs assessments.

Q4 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

Q5	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:	

Q6	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 checked="" type="checkbox"/> NO <input type="checkbox"/>	
B <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

Q7	Do you agree in principle with the working group's proposal to develop a national set of accessibility standards consisting of a national regulatory baseline, and optional higher standards consisting of an intermediate and wheelchair accessible standard? Y/N.
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<p>Q8</p>	<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>Wheelchair Housing Design Guide/standards:</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>B) YES <input type="checkbox"/> NO <input type="checkbox"/></p>	
<p>Comments:</p>	

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

Q9	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:	

Q10	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:	

Q11	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 type="checkbox"/>	
Comments:	

Q12	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 checked="" type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>	
Comments:	

Accessibility – Technical questions

QA1.1	<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:	

QA1.2	<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:	

QA1.3	<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:	

QA1.4	<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>	

QA1.5	<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>	

QA1.6	<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>	

QA1.7	<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>	

QA1.8	<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>	

QA1.9	<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"> • Approach routes • External steps • Communal Approach route • Communal entrance doors • Private entrance • Hall and landing widths • Clear access zones and route • Consumer units
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YES NO

Comments:

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

Please indicate which of the options below you agree with.

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

A B C

Comments:

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

Comments:

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

YES NO

Comments:

QA1.13	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:	

QA1.14	<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:	

QA1.15	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:	

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

Comments:

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

Comments:

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

YES NO

Comments:

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

YES NO

Comments:

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

YES NO

Comments:

Space – General questions

Q13	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: This is a sensible mechanism that will be market-led as consumers become savvy over time about the metric used. We would encourage the use of square metres for the whole house, rather than for individual room sizes.	

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

Q15	If not, what alternative approach would you propose?
Comments:	

Q16	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: Space labelling is a logical move that is market-led, but this should not mean space standards are ignored in favour of them.	

Q17	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 checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

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

Q19	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: It is important to point out that local authorities will have their own individual priorities in terms of space, design and flexibility. Demographics will differ wildly between local authorities, particularly in areas such as central London where small, well designed homes fill the market need compared to, for example, areas on the south coast which may be populated by an older demographic. A single space standard therefore become difficult to apply nationally as different local	

authorities will have their own local needs. A tiered approach may work, with a limited number of space standards outlined of which local authorities can choose one (with reasonable justification) to set as their default. It is important to note, though, that there are examples of developers, such as 'Pocket' in London who specialise in small, flexible homes, that do not build to minimum space requirements (i.e. those outlined in the London Plan), but are allowed to build smaller-than-standard homes as they fulfil a market need. We envisage a very workable solution along the lines of the London Plan occurring, where local authorities are able to make exceptions, but can set a nationally agreed space standard to ensure high quality homes exist for their residents in line with access standards. It is important that any space standard does not result in significantly higher house prices above and beyond what consumers are able to pay.

We believe therefore that clear, independent research on space standards is further required before a national standard can be outlined.

Q20	Do you agree with the proposed limiting of the scope of any potential space standard to internal aspects only? Y/N
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YES NO

Comments:

The aspects mentioned (particularly external private space, day-lighting and sun-lighting) are important and should be considered and included within the further analysis that the consultation goes on to state will be carried out in paragraph 133.

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?
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YES NO

Comments:

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

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

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

Q25	<p>Can you provide any of the following, (supporting your submission with</p>
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	<p>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>
<p>A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/></p>	
<p>Comments:</p>	

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

Q27	<p>Do you agree with this approach to managing cycle storage? Y/N.</p>
<p>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/></p>	
<p>Comments:</p>	

Space - Technical questions

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

QA2.2	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:	

QA2.3	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:	

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

Comments:

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

Comments:

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

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

A B C

Comments:

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

Comments:

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

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

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

QA2.9	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

Q28	<p>Do you support the view that domestic security for new homes should be covered by national standards/Building Regulations or should it be left to market forces/other?</p> <p>a) national standards/Building Regulations</p> <p>b) market forces/other</p> <p>Where possible, please provide evidence to support your view?</p>
<p>A <input checked="" type="checkbox"/> B <input type="checkbox"/></p>	
<p>Comments:</p> <p>The NPPF makes it clear how important security is - national standards or building regulations are the best way to ensure this.</p>	

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

Q29 – Part 2	<p>If yes, which of the approaches set out above do you believe would be most effective to adopt (please select one only)?</p> <p>a): Option 1 – A baseline (level 1) standard and a higher (level 2) standard.</p> <p>b): Option 2– A single enhanced standard (level 2) for use in areas of higher risk only.</p>
<p>A <input checked="" type="checkbox"/> B <input type="checkbox"/></p>	
<p>Comments:</p> <p>Aspects of Secured by Design would be the logical option to incorporate into a higher national standard.</p>	

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

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

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

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 <input type="checkbox"/> NO <input type="checkbox"/>	
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 <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments: For the most part, yes. Therefore, applying this to a standard or building regulations should not prove a problem.	

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

Q36	<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>	

Q37	<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>	

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

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

Security – Technical questions

QA3.1	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:	

QA3.2	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:	

QA3.3	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:	

QA3.4	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

Q40	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:	

Q41	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:	

Q42	Do you agree that the national minimum standard set in the Building Regulations should remain at the current Part G level? Y/N. (see also Question 43)
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments: We agree with the Challenge Panel's recommendation that a higher target of 105l/p/d is achievable without compromising quality or functionality of potable water utility. Organisations that our members work for are incorporating 105l/p/d as standard practice on new developments.	

Q43	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:	

Q44	Do you agree that no different or higher water efficiency standards should be able to be required? Y/N.
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments: Flexibility leads to innovation - local authorities may want to require higher standards for water efficiency in the future (where justifiable), particularly in areas like the South East that will become more water stressed owing to population pressure etc.	

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

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

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

Q48	<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 the evidence to support your alternative figures.</p>
<p>YES <input type="checkbox"/> NO <input type="checkbox"/></p>	
<p>Comments:</p>	

Q49	<p>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.</p> <p>If you do not agree, please provide the evidence to support your alternative figures.</p>
<p>YES <input type="checkbox"/> NO <input type="checkbox"/></p>	
<p>Comments:</p> <p>We have only anecdotal evidence, but as mentioned above, we have many members who work in the housing sector who state they, and their competitors, are already building above Part G standards.</p>	

Q50	<p>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:</p> <p>a) a more general requirement to build to Code Level 3 or above? Or</p> <p>b) a water-specific planning requirement? And</p> <p>c) are you likely to introduce or continue with a water-specific water efficiency standard (beyond the Building Regulations) in the future?</p>
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A <input type="checkbox"/>
B <input type="checkbox"/>
C <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/>
Comments:

Water – Technical questions

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

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

Chapter 5: Energy

Q51	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: We fully support the zero carbon homes 2016 policy through the building regulations, and we agree that fabric energy efficiency standards and carbon compliance levels belong in a national standard.	

Q52	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 type="checkbox"/> NO <input type="checkbox"/>	
Comments: The CIOB welcomes a greater focus on a building's fabric efficiency. As part of the rationalisation, however, we also believe that there are significant areas in the Code for Sustainable Homes that would be lost if it was to be phased out, such as the responsible sourcing of materials through the supply chain. This and other aspects would need to be fully considered as a standard or indeed optional guidance, as integrating them into the Building Regulations will prove problematic if not impossible in some cases. The Code is essentially a phased process of achieving progressively higher standards. It continues to inform the debate on future Building Regulations (not just Part L) and has created some outstanding examples of developments for the industry to follow - we have concerns that removing higher optional standards such as this may lead to a loss of innovation in the market. A recent study by Davis Langdon and Element Energy suggested that the costs of building to Level 5 have dropped by 55%, and Level 6 by 40% since 2011. The full report can be found here: http://www.brighton-hove.gov.uk/sites/brighton-	

hove.gov.uk/files/EP059%20Costs%20of%20building%20to%20the%20Code%20for%20Sustainable%20Homes%20%28Sept%202013%29%20%28draft%29.pdf

This raises a number of questions about the viability of removing and not integrating these parts of the Code that are not related to energy.

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

YES NO

Comments:

Q54 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 NO

Comments:

Q55 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 NO

Comments:

Q56 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:

Although local variation in standards set through the Planning and Energy Act 2008 has frustrated developers and sometimes proved costly and complicated, some local authorities have pioneered higher standards - the use of national standards should not be a barrier to some going above and beyond in terms of optional standards. Indeed, in terms of renewables, the use of district heating schemes or wider spatial issues such as those outlined in the recent 'Allowable Solutions' consultation should be of consideration outside the building regulations in ways which are consistent with national policy and standards, for example through the NPPF.

However, we do believe that local authorities should avoid setting prescriptive approaches, and instead remain outcome focused to allow developers to innovate and building control professionals to be best placed to apply their technical knowledge.

Chapter 6: Indoor environmental standards

Q57	<p>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.</p> <p>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)?</p> <p>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.</p>
A) YES <input type="checkbox"/> NO <input type="checkbox"/>	
B) YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

Q58	<p>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.</p> <p>If you have any relevant research or evidence please submit this as part of your consultation response.</p>
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

Q59	<p>Do you agree that sunlighting should sit outside the scope of this review? Y/N.</p>
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments:	
We agree with the Challenge Panel's recommendation that standards for	

daylight, sunlight and ventilation should be further investigated. These are linked intrinsically to overheating; the Zero Carbon Hub suggested three years ago that SAP should be improved to better address overheating, of which there has been no progress as far as we are aware.

Q60 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 NO

Comments:

Chapter 7: Materials

Q61	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>The phasing out of the Code for Sustainable Homes means that materials will be an issue that will be neglected unless a nationally described standard for it is established. We believe that a specific materials working group should be established to consider the creation of a nationally described standard. Further information is in our response to Q52.</p>	

Chapter 8: Process and compliance

Q62	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 checked="" type="checkbox"/>	
Comments: <p>This approach is within the overall aims of rationalisation that the Review set out initially, and we recognise that implementing everything within a short timescale is challenging, not just from a regulatory perspective, but also to provide the industry with a clear steer. As suggested in our response to Q1, 2016 is a reasonable time for the standards to be integrated into the building regulations and government should publish a timescale in early 2014, potentially alongside a response to this consultation, that provides the industry with a clear direction on what is intended to happen.</p> <p>However, as the Challenge Panel have rightly suggested, the government's self-imposed rule on regulation (i.e. 'one in, two out') should absolutely not be a valid reason to delay action or result in inaction; this Review is an opportunity to significantly, and sensibly, rationalise building regulations and standards, and should not be missed through the government's self-imposed limits on introducing regulation.</p>	
Q63	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: <p>We welcome the Review's highlighting of BIM as an efficient and integrated way of working and as a process that creates benefits from a regulatory, compliance and verification perspective. These alone will likely deliver efficiencies through the supply chain, with housing standards also providing efficiencies.</p>	
Q64	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 checked="" type="checkbox"/> NO <input type="checkbox"/>	
<p>Comments:</p> <p>We welcome the Review's highlighting of BIM as an efficient and integrated way of working and as a process that creates benefits from a regulatory, compliance and verification perspective. These, linked with the national standards, will likely deliver efficiencies through the reduction of abortive work and increased costs.</p>	