

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:	Philip
Last Name:	Dunbavin
Position:	Chairman
Name of organisation (if applicable):	Association of Noise Consultants
Address:	The Old Pump House, 1A Stonecross, St Albans AL1 4AA
Email address:	info@theanc.co.uk
Telephone number:	020 8253 4518

(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:

Association of Noise Consultants

(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 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"/>	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"/>	
<p>Comments:</p> <p>The ANC feel that option B would provide the most efficient outcome.</p> <p>This rationale behind this is as follows:</p> <p>Option B would allow government and industry to consult in detail on the nationally described standards and provide adequate time to ensure the balance of cost against items such as sustainability.</p> <p>This consultation would then allow government to set a clear timetable as to implementation and a gradual improvement of the standard to drive efficiency and innovation within the industry.</p> <p>Option A it was felt without a clear commitment to improved standards filtering into building regulations would result in uncertainty within the industry. This would in the long term potentially result in a sub optimal outcome for investment and business planning.</p> <p>Option C it was felt may place a large degree of uncertainty on the sector, this in the short term could result in investments being placed on hold until regulatory conditions were decided.</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:

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.
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YES <input type="checkbox"/> NO <input type="checkbox"/>
Comments: There shouldn't be a difference, however, those providing affordable housing should still be able to set their own minimum requirements over and above those provided nationally.

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.
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Comments: No comment

Accessibility – General questions

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

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

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

Q8 Do you agree with the costs and assumptions set out in the accompanying impact assessment? Specifically we would like your views on the following:

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.

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.

Wheelchair Housing Design Guide/standards:

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.

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.

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.

A) YES NO

Comments:
No comment

B) YES NO

Comments:
No comment

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:	No comment

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:	No comment

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: No comment	

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

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

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

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

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

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

Q15	If not, what alternative approach would you propose?
Comments: No comment	

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: No comment	

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

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: No comment	

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: No comment	

Q20	Do you agree with the proposed limiting of the scope of any potential space standard to internal aspects only? Y/N
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments: No comment	

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

Q22	<p>Do you agree with the costs and assumptions set out in the impact assessment? We are particularly interested in understanding;</p> <p>a) Do stakeholders agree with our assumption that house builders are able to recover 70% of the additional cost associated with space in higher sales values?</p> <p>b) Do you agree with the extra over unit costs we have used for the current and proposed space standards? If you do not agree, could you provide evidence to support alternative figures for us to include in the final impact assessment?</p> <p>c) Do you agree with the proportion of homes we have estimated to have taken up space standards in the “do nothing” and “option 2” alternatives? If you do not agree, could you provide evidence to support alternative figures for us to include in the final impact assessment?</p> <p>Please provide reasons for your answers.</p>
A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>	
Comments: No comment	

Q23	If you do not agree with the costs set out in the impact assessment please state why this is the case, and provide evidence that supports any alternative assumptions or costs that should be used?
Comments: No comment	

Q24	We also need to verify how many local authorities are currently requiring space standards, and what those space standard requirements might be. Can you identify any requirements for space standards in local planning policies? Please provide evidence or links where possible.
Comments: No comment	

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

Q26	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: No comment	

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

Space - Technical questions

QA2.1	Do you agree that any space standards, if adopted, should be coordinated with the requirements of relevant accessibility standards? Y/N
YES <input 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	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? a) national standards/Building Regulations b) market forces/other Where possible, please provide evidence to support your view?
A <input type="checkbox"/> B <input type="checkbox"/>	
Comments: No comment	

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

Q29 – Part 2	If yes, which of the approaches set out above do you believe would be most effective to adopt (please select one only)? a): Option 1 – A baseline (level 1) standard and a higher (level 2) standard. b): Option 2– A single enhanced standard (level 2) for use in areas of higher risk only.
A <input type="checkbox"/> B <input type="checkbox"/>	
Comments: No comment	

Q30	<p>If the level 2 standard is used how do you think it should be applied;</p> <p>a) On a broad local basis set out in local planning policy?</p> <p>Or</p> <p>b) On a development by development basis?</p>
<p>A <input type="checkbox"/> B <input type="checkbox"/></p>	
<p>Comments:</p> <p>No comment</p>	

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

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

Comments:
No comment

Q33 Do you agree with the overall costs as set out in the accompanying impact assessment? Y/N.

If you do not agree, then do you have evidence to support alternative figures?

YES NO

Comments:
No comment

Q34 Do you agree that level 1 security reflects current industry practice? Y/N.

If you do not agree, then do you have evidence to support an alternative view?

YES NO

Comments:
No comment

Q35 Do you agree with the assumptions used to derive the extra over cost of Secured By Design as set out? Y/N

If you do not agree, then do you have evidence to support alternative figures?

YES NO

Comments:
No comment

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: No comment</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: No comment</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: No comment</p>	

Q39	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 evidence to support alternative figures for us to include in the final impact assessment?
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments: No comment	

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

Q41	Do you agree that standards should be set in terms of both the whole-house and fittings-based approaches? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments: No comment	

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 type="checkbox"/>	
Comments: No comment	

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 type="checkbox"/>	
Comments: No comment	

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 type="checkbox"/>	
Comments: No comment	

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: No comment	

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

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

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

No comment

Water – Technical questions

QA4.1 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 B C

Comments:

QA4.2 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

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

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: No comment	

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

Q54	<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 type="checkbox"/></p>	
<p>Comments:</p> <p>No comment</p>	

Q55	<p>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.</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>No comment</p>	

Q56	<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>It is right to allow local government to set their own standards, subject to viability reviews e.g. robust and tested Local Plans.</p>	

Chapter 6: Indoor environmental standards

Q57	Government is interested in understanding the extent to which daylighting in new homes is a problem, and the appetite for a daylighting design standard to be available to designers and local authorities. a) Do you believe that new homes are not achieving a sufficient level of daylighting in habitable rooms? Y/ N. If so what evidence do you have that this is the case (please submit evidence as part of your consultation response)? b) Do you think that it is desirable to consider having a national daylighting standard for use in the design of new homes? Y/N.
A) YES <input type="checkbox"/> NO <input type="checkbox"/>	
B) YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments: No comment	

Q58	Do you agree that a review of simple percentage based methodologies should be undertaken to help determine if such an approach is fit for purpose? Y/N. If you have any relevant research or evidence please submit this as part of your consultation response.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments: No comment	

Q59	Do you agree that sunlighting should sit outside the scope of this review? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments: No comment	

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.
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YES NO

Comments:

Indoor environmental quality has been considered to include lighting, thermal comfort and air quality, but the consideration of and integration with noise appears to have been omitted. This is a somewhat surprising and significant omission, in the context of the International Standard published to assist in consistent assessment of energy performance:

ISO 15251: 2007, Indoor environmental input parameters for design and assessment of energy performance of buildings addressing indoor air quality, thermal environment, lighting and acoustics.

Adverse noise impacts on indoor environmental quality may be considered in three contexts:

1. External noise limiting the potential for normal ventilation with natural ventilation strategies.
2. External noise (as noted in the consultation, as with security concerns) may limit the potential for using opening windows and hence natural ventilation to control overheating.
3. Noise from mechanical ventilation systems

Issues 1 and 2, external noise:

While it is acknowledged that issues with external noise are typically dealt with through the planning system, they are done so inconsistently between local authorities. These Standards represent an opportunity to describe in one place a consistent set of standards that are appropriate nationally. Currently, inconsistencies include some local planning authorities to require purge ventilation to be provided mechanically where opening windows would permit internal levels to exceed the levels recommended for the whole of the daytime or night time periods, despite that fact that purge ventilation is only provided intermittently. There is thus confusion between controlling overheating and provision of purge ventilation; in our experience, local planning authorities do not have the technical expertise

to distinguish between these aspects of indoor environmental quality, resulting in planning conditions that require unsustainable buildings. Hence these standards would seem to be the ideal place to clarify the issues.

There is currently insufficient data and knowledge to determine appropriate noise limits whilst providing purge ventilation, or the acceptable trade off between thermal comfort and elevated noise levels (i.e. when overheating to different degrees, what elevated level of noise may be acceptable?). More research is needed to enable better informed design strategies to provide reasonable living conditions.

Issue 3: mechanical ventilation:

The problems with poor design, installation, commissioning and maintenance of domestic mechanical ventilation systems are just gaining cognisance in the UK, with . There are many potential causes of excessive noise levels, but there is currently scant guidance and no enforcement of any suitable noise levels from these systems. Excessive noise precludes their effective operation by the occupants.

The same problems have been encountered in many other European countries. There is no doubt that noise is one of the most common reasons that occupants “may take radical steps in response to problems with their indoor environment – such as turning the MVHR system off”, according to “Assessment of MVHR Systems and Air Quality in Zero Carbon Homes” [Greenwatt Way], NHBC Foundation NF52, 2013.

In 2011, around 30% of new homes had MVHR installed, and 40% had MEV [BSRIA data]. Hence there is an immediate need to both define suitable noise limits and enforce their application. It is suggested that this may be undertaken through Part F of the Building Regulations in the longer term, but these standards represent an opportunity to prevent the wasteful installation of inappropriately designed systems that will not be used because they are too noisy, and prevent the adverse health effects that occupants will suffer as a result.

These issues are described in greater detail in a paper in the Institute of Acoustics Proceedings, “Problems in residential design for Ventilation and Noise”, Vol 35 Pt. 1- 2013 pp 74 - 87 by J Harvie-Clark and M Siddall. Design criteria are proposed for appropriate conditions, and those conditions for which there is currently insufficient data to determine design

criteria are identified in an attempt to preclude inappropriate design requirements by local planning authorities.

OTHER COMMENTS under Section 6

The consultation document does not ask questions in relation to issues surrounding Noise.

The inclusion within the current Building Regulations Approved Document E of defined sound insulation targets and a requirement for testing in new build and properties subject to a material change of use has been a strong positive factor in raising the quality of housing; in particular, this has benefited the standard of housing converted to flats.

The Code for Sustainable Homes allows for greater credits for better sound insulation and we are concerned this beneficial approach may be lost if the Code is discontinued.

The review of Housing Standards should maintain and support the existing requirements for sound insulation standards and registered testing schemes.

There is also the potential to include external noise effects on habitable rooms in new guidance to supplement the National Planning Policy Framework.

The Code for Sustainable Homes includes Sound Insulation under Health and well-being and points are available, in part, for achieving higher performance than required by the Building Regulations. The presence of these higher standards is seen as positive, not least because the achievement of the performance required by the Building Regulations does not guarantee residents satisfaction. Consequently a number of developments which have been assessed under the Code for Sustainable Homes have increased levels of sound insulation. Furthermore Robust Details constructions have been developed which can meet these higher standards.

In the proposed consultation there is no mention of sound insulation although it would be appropriate in Chapter 6 Indoor environmental standards. Consequently if the changes occur as proposed in the consultation document the higher standards for sound insulation will cease to exist. This is likely to lead to a reduction in the resulting sound insulation

in many future developments.

To address this concern we suggest an addition could be made to Approved Document E which introduces the higher performance standards, or they could be included in the proposed 'Nationally described standards'.

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 type="checkbox"/>	
Comments: No comment	

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 type="checkbox"/>	
Comments: No comment	

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: Yes, however, the Code for Sustainable Homes as it is currently applied provides a greater level of quality assurance than the current building regulations system, as it requires a thorough review of as-built quality at completion of buildings, carried out by independent assessors who are trained and regularly audited. Good aspects of the code where lessons could be learnt are, that the developer is required to produce evidence of compliance to a qualified code assessor, and that assessment can also be randomly audited by the BRE. It is therefore felt that it is important to have a standard methodology and process of review for case of Building Control, as otherwise there is potential for there to be a significant degree of variation depending on the council/building control officer. Another aspect that would need consideration is ensuring that the skills are available for assessment. If proper training and resourcing of monitoring the implementation of the new standards is not given sufficient attention then the standards are unlikely to meet their intended objectives. Only by ensuring that such measure are in place will the government be	

able to drive efficiencies.

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 NO

Comments:
Yes, efficiencies can be made. Improving consistency is important for efficiency, however, having standards that do not respond to local market conditions, and so contain no flexibility can be equally as inefficient.
For this reason, it is important to have a degree of local variation, but where possible this should take place in a consistent manner as to achieve efficiencies from applying these differentials when interacting with commercially driven parties.