Department for
Communities and
Local Government

Housing Standards Review

Summary of Responses

March 2014

Department for Communities and Local Government

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About the consultation

1. The Department for Communities and Local Government (DCLG) issued a consultation in August 2013, seeking views on the results of a review of local housing standards. The review proposed a radical reform of the framework of building regulations, guidance, local codes and discretionary technical housing standards that are currently applied to new housing through the planning system. It aimed to reduce bureaucracy and costs on house builders to support growth, whilst delivering quality, sustainability, safety and accessibility.

2. The consultation was divided into two separate documents. The main document contained general questions focused around eight chapters. The second document contained illustrative technical standards. The chapters proposed the following:

    - **Chapter 1 – Accessibility:** considered whether there was a need for new dwellings to meet adaptability and accessibility requirements above Part M of the Building Regulations; and, if so, what the higher standard or standards should be. It proposed a two tier set of standards above building regulations, providing for wheelchair and accessible and adaptable housing. This would be connected to proposed space standards. Local authorities would be responsible for determining the proportion of new homes needed at the higher space and access standards, based on need and viability and set out in their local plan.

    - **Chapter 2 – Space:** considered whether there was a need for the introduction or use of space standards applied to new housing in the future. Three tiers of space standards were offered for discussion – a basic minimum level, and two higher levels specifically connected to the higher access tiers. Ideas around introducing “space labelling” were also discussed.

    - **Chapter 3 – Security:** considered what security standards, if any, could be required in new homes and sought views as to whether these standards should be applied locally or nationally. Two options were proposed (aside from do nothing) – a baseline standard, based on industry good practice and a higher level for use in high crime areas, based on the current Secured by Design standard.

- **Chapter 4 - Water Efficiency:** considered water efficiency standards in new homes and proposed that a single additional standard above building regulations should be available in water stressed areas.

- **Chapter 5 – Energy:** proposed that for energy and carbon standards the preferred option would be a building regulations only approach to delivering the Zero Carbon Homes standard from 2016.

- **Chapter 6 - Indoor Environmental Quality:** looked at issues relating to the design of new homes including overheating, daylighting, sunlighting and indoor air quality. The consultation set out background considerations and the Government's proposed action in each area.

- **Chapter 7 – Materials:** Government did not bring forward a specific proposition. Given the work being undertaken in Europe on sustainable materials, the Government considered it premature to bring forward a national standard.

- **Chapter 8 – Process and Compliance:** looked at how the outcomes of the review could be implemented, options for improving the ways in which local planning and building control processes could work better together, how any emerging standards document could be owned and hosted, and the likely benefits of taking forward the proposed simplification process.

3. The consultation was launched in August 2013 and closed in October 2013. It relates to changes in England only.

Overview of consultation responses

4. The Department received responses from 546 separate organisations and individuals. Two thousand eight hundred and forty-seven (2847) people also responded by e-mail to a campaign instituted by the Royal Institute of British Architects (RIBA) Space in relation to two questions on space standards and labelling.

5. There were 247 responses received from a wide range of organisations that did not fall within the sectors specified in the consultation response form. Among those who did identify with a sector, the largest number of responses came from local authorities, designers, engineers, surveyors, builders, developers and property management organisations. There were also a significant number of responses from organisations which had a specific interest. We have detailed the breakdown of responses by sector in the following table.

Responses by sector

No.	Sector	Number of respondents	% of total Respondents
1.	Builders/Developers	25	5%
2.	Property Management	24	4%
3.	Building Occupier	9	2%
4.	Local Authorities	106	19%
5.	Designers/Engineers/Surveyors	40	7%
6.	Specific Interest	64	12%
7.	Energy Sector	16	3%
8.	Fire and Rescue Authority	2	less than 1%
9.	Manufacturer/Supply Chain	13	2%
10.	Other	247	45%

6. This report is structured around eight chapters which reflect those set out in the main Housing Standards Review consultation document. Some of these chapters had associated technical questions and these have been added to the end of the relevant chapter. The summaries consist of tables showing where responses came from and how different respondents responded to specific questions. The figures in the tables provide a quantitative analysis of responses and these are supported by a more qualitative analysis of the comments and views submitted. Where questions invited comments only, a qualitative analysis has been provided without any tables. Qualitative analysis does not seek to itemise every view expressed, but typically identifies trends, detail or commonly held views that would not be reflected in purely statistical analysis. Where appropriate the percentage figures of the statistical data have been rounded up or down to maintain consistency.

7. This report is an analysis of the responses received. It does not set out how the Government intends to take these proposals forward. Decisions on the implementation of proposals will be the subject of separate statements.

Introduction

8. The consultation's introduction set out the rationale for the review and outlined the Government's strategic approach to implementing and managing the outcome of the review (these issues were expanded on in Chapter 8). It also invited views on the Impact Assessment and requested additional evidence from respondents to help inform the final policy options.

Implementing the review outcomes

9. The Government presented three key strategic options for implementing the review and invited views on;

   A. whether Government should develop a nationally described standards set which would operate in addition to the building regulations (where rigorous local needs and viability testing indicated it could apply);

   B. whether Government should develop a nationally described standards set as a stepping stone en route to integrating standards into building regulations at a future date;

   C. whether Government should move now to integrate standards directly into building regulations, as functional tiers, and no technical standards would remain at all outside of the building regulations system, recognising that this will take time and may require legislative change.

Question 1 - Which of the options (A, B, or C) set out above do you prefer? Please provide reasons for your answers.

10. Three hundred and forty-eight people answered this question and there was broad support for moving the standards into building regulations rather than continuing with separate standards referenced in planning policies.

11. Forty-four per cent of respondents supported the inclusion of all standards in building regulations at the earliest opportunity without any interim standard set (Option C), for a range of reasons. There was particularly strong support from home builders / developers (17 out of a total of 22 responses) and local authorities (32 out of a total of 67 responses). There was a general sense that it would be more efficient, remove ambiguity and be easier to understand and apply. One respondent believed that it would establish a clear divide between planning (policy, conditions) and technical compliance. Another felt that it would ensure that proposals were tested using the current robust procedures for new

building regulations which provide for need, regulatory impact assessment and consistency of application.

12. Some of the support for this option was qualified with a number of respondents cautioning against completely restricting standards to the building regulations as they wanted to retain flexibility to meet local needs. Others did not support the introduction of "tiers" as they were concerned that it could lead to over-regulation.

13. Thirty-six per cent of respondents supported Option B, developing a nationally described standards set as a stepping stone to building regulations. The strongest support was from local authorities (20 out of a total of 67 responses). A number of those who supported this option recognised the time it could take to introduce regulations. There was also a view that Option B would provide improved simplicity. Some respondents wanted local authorities to have the choice to opt into selected standards where appropriate.

14. The 20% who chose Option A also gave varied reasons. Respondents felt that this option would allow local factors to continue to be reflected in the local planning process, that the building regulations did not have the required skill set or resources to cope with additional issues being added into the Regulations, it would allow for a review and implementation of a national scheme, and that a tried and tested form of national standards already existed in the form of the Code for Sustainable Homes.

Table 1: Introduction - Analysis by Sector

Q1	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	69	20%	1	0%	2	1%	1	0%	15	4%	7	2%	7	2%	4	1%	0	0%	1	0%	30	9%
B	125	36%	4	1%	9	3%	4	1%	20	6%	17	5%	15	4%	4	1%	1	0%	4	1%	46	13%
C	154	44%	17	5%	8	2%	3	1%	32	9%	4	1%	20	6%	2	1%	0	0%	3	1%	62	18%
Total	348	100.0%	22	6%	19	5%	8	2%	67	19%	28	8%	42	12%	10	3%	1	0%	8	2%	138	40%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Curtailing the proliferation of standards

Question 2 - Do you agree that there should be a group to keep the nationally described standards under review? Y/N.

15. Three hundred and eighty-six people responded to this question and the vast majority (372 or 96%) overwhelmingly supported the proposal for a group to oversee the standards. This was reflected across all the sectors. All 20 builders/developers and 66 of the 72 Local authorities who responded supported this.

16. The 4% who disagreed felt that there was either no need for such a body or that the Building Regulations Advisory Committee (BRAC) could fulfil this role.

			Table 1: Introduction - Analysis by Sector																			
Q2	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	**372**	**96%**	20	**5%**	20	**5%**	8	2%	66	17%	33	9%	49	13%	10	3%	1	0%	11	3%	148	38%
NO	**14**	**4%**	0	**0%**	0	**0%**	0	0%	6	2%	0	0%	0	0%	0	0%	0	0%	0	0%	8	2%
Total	**386**	**100.00%**	20	**5%**	20	**5%**	8	**2%**	72	**19%**	33	**9%**	49	**13%**	10	**3%**	1	**0%**	11	**3%**	156	**40%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Affordable housing

Question 3 - Do you agree that the proposed standards available for housing should not differ between affordable and private sector housing? Y/N. Please provide a reason for your answer.

17. Three hundred and seventy-two people responded to this question and the majority (88%) supported the proposed cross tenure approach. There was notable support for this from local authorities (67 of 68), designers / engineers / surveyors (28 of 32) and specific interest groups (37 of 42). There was recognition that the cross tenure approach was sensible given that tenure could change over the lifetime of a home. A level playing field was important to ensure

that every household would have a home that was adequate for their current needs and flexible for their future. There was a suggestion that standards should not be reduced to the lowest common denominator in pursuit of affordability – a “race to the bottom” – and that the final adopted standards should be based on a reasonable minimum quality level. There were some recommendations that there might be a need for exceptions where needs differed across tenure, for example with regards to access where the proportion of homes occupied by older and disabled people is much higher in affordable housing.

18. Among the 12% who disagreed, there were some concerns about unintended consequences such as fewer affordable homes being delivered as a result of increased build costs in private development. One respondent said that where housing associations have grant funding and developers benefit from guaranteed sales, housing associations should be able to require improved standards to suit the needs of their potential occupiers.

Table 1: Introduction - Analysis by Sector

Q3	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	**No.**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**
YES	**326**	**88%**	13	**3%**	20	**5%**	7	2%	67	18%	28	8%	37	10%	11	3%	1	0%	11	3%	125	34%
NO	**46**	**12%**	7	**2%**	2	**1%**	1	0%	1	0%	4	1%	5	1%	0	0%	0	0%	0	0%	26	7%
Total	**372**	**100.00%**	20	**5%**	22	**6%**	8	**2%**	68	**18%**	32	**9%**	42	**11%**	11	**3%**	1	**0%**	11	**3%**	151	**41%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Impact assessment

Question 4 - 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.

19. Limited evidence was submitted but there were a broad range of views from respondents. Some agreed with the estimates but gave qualified support. Those who weren’t supportive gave a broad range of reasons for this, though typically some regarded costs were too low while others thought that they were too high. There was a notable amount of concern about the scope of the estimates. There

were suggestions that the costs were too focused on savings to homebuilders and industry and were just an exercise in up-front cost-cutting. There were recommendations that the Government undertake further, detailed studies to account for the costs and benefits of housing standards on changing demographics, wider health and social cost benefits to society/public services, future occupiers of homes which are not energy efficient or are less secure from crime, and on the principles of sustainable development.

20. There was some concern about the fast pace of the changes which some felt could lead to decisions being made that were not fully qualified or considered. There was also concern, particularly from members of the Metropolitan Police about the impact of the changes on security costs.

Chapter 1: Accessibility

21. The consultation set out the Government's commitment to ensuring that new homes meet the needs of current and future occupants. The consultation document sought views on how best to rationalise and simplify existing accessibility standards to ensure these needs are met most effectively.

Question 5 – Do you agree that minimum requirements for accessibility should be maintained in Building Regulations?

22. The consultation document set out the government's belief that there remained strong and compelling reasons to maintain the existing national baseline standard established through Part M (Access to and use of buildings) of the Building Regulations. There was overwhelming support from respondents to this approach with 277 (97%) of the 285 responses expressing agreement. This support was reflected across all sectors of respondents including from 16 of the 17 builders/developers that responded. Of those that commented, many reinforced the point that national standards needed to be maintained given the importance of ensuring new homes continue to properly consider accessibility and if that was to be the aim that regulation provided the means to achieve that cost-effectively. However, there was also significant support to see this national minimum standard being set at a higher level, with many suggesting that Lifetime Homes Standards should be absorbed into the regulations. A smaller number, however, conditioned their support for minimum standards in regulation with the proviso that higher local standards should not be available for imposition locally.

23. Of the eight respondents who disagreed, comments largely centred around concern that existing requirements were insufficient and should be increased. One respondent suggested that scheme standards could be more easily and quickly adapted or updated than regulations or legislation could be.

			Table 2: Access - Analysis by Sector																			
Q5	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	277	97%	16	6%	22	8%	7	2%	61	21%	28	10%	33	12%	4	1%	1	0%	4	1%	96	34%
NO	8	3%	1	0%	0	0%	0	0%	2	1%	1	0%	2	1%	1	0%	0	0%	0	0%	1	0%
Total	285	100.00%	17	6%	22	8%	7	2%	63	22%	29	10%	35	12%	5	2%	1	0%	4	1%	97	34%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 6 – a) Is up-front investment in accessibility the most appropriate way to address housing needs?
If Yes b)
Should requirements for higher levels of accessibility be set in proportion to local need through local planning policy?

24. The consultation also sought views as to whether continuing to include features to ensure accessibility and adaptability in new homes remained the most effective way to address older and disabled peoples housing need. There were 242 responses to the first part of this question with 207 of them (86%) supporting up-front investment as the best and most cost-effective way to meet accessible housing needs. Again many respondents indicated support for achieving this through adopting the proposed Level 2 standard as the regulated minimum – often citing likely savings in adaptation and to health and care budgets. While there was clear support from most sectors, the views of builders/developers were more balanced with eight of the 14 responses disagreeing.

25. Of the 35 respondents that did not agree and commented, the majority expressed the view that as the needs of future occupants would not be known the additional cost may be unnecessary, with a number also adding that there was little evidence setting out how new homes had utilised the built-in features within the Lifetime Homes Standard. A number simply commented that building regulations should set appropriate minimum standards with a further two respondents doubting a “one-size-fits-all” approach and favouring adaptation as a more bespoke way of addressing need.

Q6A	Summary		Table 2: Access - Analysis by Sector Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacture r / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	207	86%	6	2%	15	6%	6	2%	44	18%	23	10%	28	12%	4	2%	1	0%	3	1%	73	30%
NO	35	14%	8	3%	3	1%	2	1%	14	6%	1	0%	3	1%	0	0%	0	0%	0	0%	4	2%
Total	242	100.00%	14	6%	18	7%	8	3%	58	24%	24	10%	31	13%	4	2%	1	0%	3	1%	77	32%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

26. In the second part of this question, the consultation asked whether higher levels of accessibility should be set through local planning policy and in a proportionate way (relative to local need). In total there were 218 responses to this question with 81% agreeing and 19% not, with those who disagreed including 4 out of 6 developers. Of those that supported this view, the most common comment was that local planning policy allowed the very different demographics and needs of a particular area to be reflected in local provision. Some qualified their support by adding that this should have to be on the basis of properly evidenced need.

27. While 41 respondents indicated that they did not agree, 19 of these were from those that actually did not support up-front investment at all and therefore responded on that basis. There were only a small number of other comments which variously suggested national standards (ie regulations) should ensure adequate accessibility or that decisions on higher accessibility standards might not be best made locally.

Q6B	Summary		Table 2: Access - Analysis by Sector Builders / Developers		Property Managemen t		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufactur er / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	177	81%	5	2%	14	6%	5	2%	45	21%	20	9%	19	9%	4	2%	1	0%	3	1%	59	27%
NO	41	19%	9	4%	3	1%	1	0%	8	4%	4	2%	6	3%	0	0%	0	0%	0	0%	10	5%
Total	218	100.00%	14	6%	17	8%	6	3%	53	24%	24	11%	25	11%	4	2%	1	0%	3	1%	69	32%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 7 – 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?

28. The consultation set out a possible three tiered structure for access standards consisting of a mandatory Level 1 standard (equivalent to Part M), a Level 2 standard offering increased accessibility and adaptability (roughly equivalent to Lifetime homes) and a Level 3 wheelchair accessible or adaptable standard.

29. There was strong support for the proposed three-tier approach to accessibility with 188 (75%) of the 251 responses expressing agreement. Of those that commented and provided additional qualification, the most common comment was that the approach was generally acceptable, but that the exact proposed standard, or number of standards, was not quite right. In particular, it was suggested that the baseline standard should be increased (perhaps to incorporate Lifetime Homes standards). Other comments included the need to maintain local flexibility as to the proportions to be provided at different levels as well as a number setting out problems with certain technical elements of existing standards.

30. Of the 63 respondents that disagreed with the proposed approach, many of the comments reflected the earlier responses to Question 5. In particular, a number suggested the number of tiers be reduced to two with a higher national standard set out by regulation (with Lifetime Homes often mentioned as a possible base). There were also other suggestions that no standards should exist outside of regulation and/or that regulation should incorporate all the different standards.

			Table 2: Access - Analysis by Sector																			
Q7	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	188	75%	6	2%	16	6%	6	2%	46	18%	22	9%	19	8%	5	2%	1	0%	3	1%	62	25%
NO	63	25%	11	4%	3	1%	1	0%	16	6%	3	1%	8	3%	0	0%	0	0%	1	0%	18	7%
Total	251	100.00%	17	7%	19	8%	7	3%	62	25%	25	10%	27	11%	5	2%	1	0%	4	2%	80	32%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 8a - Do you agree with the estimated unit costs of Life Time Homes? If not we would appreciate feedback as to what you believe the unit cost of complying with Lifetime Homes is.

31. The consultation sought views and evidence on the costs of the existing Lifetime Home Standards. There were 63 responses to this question with 38 of these indicated that they did not support the figures contained in the Impact Assessment. Of those that commented, many of the responses made more general points and it was therefore difficult to determine from them whether they thought costs were under or over-estimated (although of those where this was possible a slight majority suggested costs in the Impact Assessment were too high). A number of local authorities provided figures of their own assessment of the cost of Lifetime Homes which they had either developed to inform their own planning decisions or gained from developers with cost estimates of £550, £545-1615 and 5-7.5% of build cost (the Impact Assessment had suggested a range of figures around approximately £1,150 per unit). A number of other respondents indicated that costs had been underestimated with the impact on design time, the number of dwellings that could be delivered on a site and impact on different property types, ie flats, having been underestimated.

32. Others suggested that the additional cost had been overstated because it failed to factor in the increased sale prices of properties incorporating these standards. A number of respondents also suggested that the analysis focused too much on the cost of standards and failed to properly consider the benefits these standards delivered, for example, in relation to savings on health and social care and the employment and independent living benefits.

33. Habinteg Housing Association provided detailed comments on the analysis of costs and benefits and a number of respondents in various questions dealing with the Impact Assessment expressed their support for this analysis.

			Table 2: Access - Analysis by Sector																	
Q8A	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	25	40%	1	2%	5	8%	0	0%	7	11%	3	5%	3	5%	0	0%	0	0%	0	0%	6	10%
NO	38	60%	7	11%	1	2%	1	2%	5	8%	4	6%	8	13%	0	0%	0	0%	0	0%	12	19%
Total	63	100.00%	8	13%	6	10%	1	2%	12	19%	7	11%	11	17%	0	0%	0	0%	0	0%	18	29%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 8b - Do you consider our estimates for the number of homes which incorporate Lifetime Homes to be accurate?
If respondents do not consider our estimate is reasonable we would appreciate feedback indicating how many authorities you believe are requiring Lifetime Home Standards.

34. The consultation sought views on the proportion of current housing being built to the Lifetime Home Standards. There were 43 responses to this question, with 27 respondents saying they did not agree with the Department's estimate. However, there were few substantive comments that did not repeat previous points made or provide specific examples of existing provision. From this it was difficult to draw a more general understanding of whether it was believed that the estimate in the Impact Assessment was an under or overestimate.

35. Of those that commented, a couple suggested that the estimate for numbers outside London were perhaps a little low with 15-20% suggested as perhaps a better estimate – not least, it was suggested, because of a "blanket" approach to such provision in social housing. Others indicated that few local authorities outside London required Lifetime Homes and that ensuring compliance with those requirements was often lax. A number supported the views put forward by Habinteg which suggested inconsistency in the Impact Assessment as to how certain assumptions/estimates have been used.

			Table 2: Access - Analysis by Sector																			
Q8B	Summary		Builders / Developers		Property Managemen t		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufactur er / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	16	37%	0	0%	4	9%	0	0%	7	16%	2	5%	0	0%	0	0%	0	0%	0	0%	3	7%
NO	27	63%	6	14%	2	5%	1	2%	1	2%	3	7%	6	14%	0	0%	0	0%	0	0%	8	19%
Total	43	100.00%	6	14%	6	14%	1	2%	8	19%	5	12%	6	14%	0	0%	0	0%	0	0%	11	26%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 8c - Do you agree with the figures and assumptions made to derive the extra over cost of incorporating the Wheelchair Housing Design Guide?
If not we would welcome feedback along with evidence so that we can factor this into our final analysis.

36. The consultation sought views on the cost of current wheelchair accessible standards. The 44 responses were evenly split on this question. There were few

substantive comments beyond confirmation that Habinteg’s comments were supported which reiterated concern that the methodology failed to incorporate the socio-economic benefits of improved accessibility. Two comments suggested the analysis did not properly consider the cost of all changes necessary, for example, on wall construction. Comments also questioned the level at which hourly rates used to determine process costs had been set.

Table 2: Access - Analysis by Sector

Q8C	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	22	50%	1	2%	5	11%	0	0%	8	18%	2	5%	1	2%	0	0%	0	0%	0	0%	5	11%
NO	22	50%	4	9%	0	0%	1	2%	2	5%	4	9%	3	7%	1	2%	0	0%	0	0%	7	16%
Total	44	100.00%	5	11%	5	11%	1	2%	10	23%	6	14%	4	9%	1	2%	0	0%	0	0%	12	27%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 8d - Do you have evidence of requirements for and the costs other wheelchair standards which we have not estimated?
We would appreciate the estimated costs of complying with the standard and how it impacts properties.

37. The consultation sought evidence and views on the costs of other wheelchair accessible standards. Only 11 consultees responded “yes” and all, apart from one (who referenced two other wheelchair standards), made more general comments about the costings and which have already been mentioned in the analysis on the other cost questions. However, one additional example provided related to the cost of building to the Wheelchair Design Standard. In this example it was stated that the developer had estimated the additional cost of building to the Wheelchair Design Standard at an additional 27% of build cost. However, when they examined the house types the developer typically built, their own assessment was that the developer’s standard homes could have been altered internally (with no external enlargement) to meet the Wheelchair Housing Standard at little or no extra cost (other than in terms of additional design cost).

Table 2: Access - Analysis by Sector																						
Q8D	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	11	30%	1	3%	1	3%	0	0%	3	8%	3	8%	1	3%	0	0%	0	0%	0	0%	2	5%
NO	26	70%	4	11%	2	5%	1	3%	4	11%	4	11%	1	3%	1	3%	0	0%	0	0%	9	24%
Total	37	100.00%	5	14%	3	8%	1	3%	7	19%	7	19%	2	5%	1	3%	0	0%	0	0%	11	30%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 8e - 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)?
If you do not consider the estimate to be reasonable, please could you indicate how many authorities you believe require wheelchair standards

38. The consultation sought views on the estimates in the Impact Assessment on the number of homes incorporating wheelchair accessible standards. The 27 responses to this question were fairly evenly split. Of the 13 that did not believe these figures to be accurate, there were few comments beyond reiteration of the concerns made in response to Question 8b about inconsistent use of estimates in the Impact Assessment or statements simply saying the figures were inaccurate.

Table 2: Access - Analysis by Sector																						
Q8E	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	14	52%	2	7%	2	7%	0	0%	5	19%	2	7%	0	0%	0	0%	0	0%	0	0%	3	11%
NO	13	48%	2	7%	0	0%	1	4%	1	4%	1	4%	3	11%	1	4%	0	0%	0	0%	4	15%
Total	27	100.00%	4	15%	2	7%	1	4%	6	22%	3	11%	3	11%	1	4%	0	0%	0	0%	7	26%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 9 - Do you believe that the estimated extra over costs in the Impact Assessment reflect the likely additional cost of each level?

39. The consultation sought general views on estimated cost for the proposed standards. Of the 61 respondents that answered the question, 39 disagreed with elements of the extra over cost of the different levels. While comments suggested both under and over-estimation of particular parts of the costing, around three-quarters said costs in the Impact Assessment were over-estimations. Again a number expressed concern with a methodology which it was suggested did not properly reflect all costs and benefits.

40. Of the more substantive comments that explained why costs might have been overestimated, there was some suggestion that greater familiarity with these standards would reduce design costs in the future and that, more broadly, economies of scale would reduce overall costs in the future. Indeed it was suggested that there was no additional cost to the Lifetime Homes standards other than some design cost. One respondent also questioned the premise that additional costs actually fell on the developer rather than being offset by a reduction in land value (and therefore actually represented a cost to the landowner).

41. Of those that provided comments on why they believed costs had been under-estimated, a variety of reasons were provided. One builder/developer suggested that while the costs were generally about right, they did not properly factor in the increased land cost to meet the standards. Similarly a respondent also suggested that space costs need to be included to provide a complete picture of cost. Another builder/developer expressed the more general view that the cost of both the Lifetime Homes standard itself and the cost of design more generally were underestimated. One respondent also suggested that the cost estimate failed to reflect the Level 2 requirement for lift provision to all units above or below the entrance level which would have a significant cost impact in certain developments.

			Table 2: Access - Analysis by Sector																			
Q9	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	22	36%	1	2%	3	5%	0	0%	8	13%	3	5%	1	2%	0	0%	0	0%	0	0%	6	10%
NO	39	64%	7	11%	3	5%	0	0%	5	8%	5	8%	6	10%	0	0%	0	0%	0	0%	13	21%
Total	61	100.00%	8	13%	6	10%	0	0%	13	21%	8	13%	7	11%	0	0%	0	0%	0	0%	19	31%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 10 - Do you agree that level 3 properties should be capped in order to ensure local viability calculations remain balanced?
If yes, at what level should the cap be set?

42. The Consultation sought views as to whether it was appropriate to introduce a cap on the proportion of homes which local authorities could require to be built to wheelchair accessible or adaptable standards. There were 175 responses to this question with just over two-thirds disagreeing with the imposition of a cap and with home builders split with 4 supporting a cap, and 4 disagreeing. Of the 56 respondents that indicated they supported a cap, only 14 clearly stated what level they believed a future cap should be set at. Of those, three suggested 10%, seven suggested 5% (with two indicating a preference for this only applying to developments of a particular size), one stated 1-2%, one 5-10% and finally one at 5% for affordable rented housing and 10% for private housing. A number of these responses also provided additional comment to clarify their support. One point that a number made was that the cap should be determined primarily by local need and viability. A variation on this view suggested that while the cap should be set locally, the level should be determined according to a national methodology. Others said the cap should incorporate some flexibility, for example, to either ensure higher provision in certain developments or to recognise that certain sites may not be suitable for wheelchair access at all.

43. Of those that disagreed, a number did so on the basis that there was no case for Level 3 or tiered access standards at all. However, the majority of the respondents that commented made the point that it should be for local authorities to determine the provision necessary in light of their assessment of local need. Many also made the point that a cap would just add further confusion and complexity to what is required. A number also questioned whether a cap should be determined to such a degree by viability considerations given equality implications. One further concern with a cap was the danger that it would lead to local authorities just requiring provision at that level rather than in response to an established need.

Q10	Summary		Table 2: Access - Analysis by Sector																			
			Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacture r / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	**56**	**32%**	7	**4%**	9	**5%**	2	1%	11	6%	9	5%	7	4%	0	0%	0	0%	0	0%	11	6%
NO	**119**	**68%**	7	**4%**	4	**2%**	3	2%	38	22%	10	6%	13	7%	4	2%	0	0%	0	0%	38	22%
Total	**175**	**100.00%**	14	**8%**	13	**7%**	5	**3%**	49	**28%**	19	**11%**	20	**11%**	4	**2%**	0	**0%**	0	**0%**	49	**28%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 11 - If a cap were to be adopted should it, in principle a) vary across tenure or b) be flat?

44. The consultation also set out that the likely need for wheelchair housing varied between private sector housing and social sector or affordable housing, and sought views as to whether if a cap were introduced, this should vary between tenures. There were 123 responses to this question with 45 (37%) supporting a cap that varied across tenure with 78 favouring a uniform cap. Of those that favoured a uniform cap, the two main comments made to support their view was that a cap which varied across tenure would just lead to greater inconsistency and confusion and that the provision required should be based purely on an assessment of where the need existed. Others suggested there was no evidence to support lower provision in the private sector or vice versa in the affordable sector. Other comments included a concern that higher provision for affordable housing would simply push that burden on to that sector or potentially penalise social housing and make it less viable.

45. Of those that favoured a cap that varied across tenure again there were two main supporting arguments. First, that there was greater need for such provision in the affordable housing sector and second that the level of provision required should be driven by an assessment of local need.

Q11	Summary		Table 2: Access - Analysis by Sector																			
			Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	45	37%	3	2%	6	5%	3	2%	9	7%	6	5%	3	2%	1	1%	0	0%	0	0%	14	11%
B	78	63%	5	4%	9	7%	0	0%	26	21%	11	9%	7	6%	0	0%	0	0%	0	0%	19	15%
Total	123	100.00%	8	7%	15	12%	3	2%	35	28%	17	14%	10	8%	1	1%	0	0%	0	0%	33	27%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 12 - 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'?

a) fully support.
b) neither support or oppose.
c) oppose

46. The consultation proposals set out the possible integration of standards into the building regulations as variable regulations and sought views as to the extent of support for doing so with the proposed access standards. There were 197 respondents that gave a view with a majority of respondents (61%) supporting such an approach. This support was reflected across the majority of different sectors and especially from the property management, local authority, designers/engineers/surveyors and the "other" sectors.

47. Comments, in particular, welcomed the potential for provisions to be in one place with the consequential consistency and clarity that would result from that. This, it was also argued, would allow for the effective implementation and monitoring of access requirements with associated benefits in the level of compliance. In addition, others broadly welcomed the approach subject to standards being set at a particular level, for example, that the national minimum standard in Part M was improved to Lifetime Homes standard.

48. Of the 25% that said they neither supported or opposed the approach, there were fewer substantive comments made to explain their view. This was in part due to concern about the level the standards might be set at, while others indicated that they could not agree or disagree at this stage without further certainty/detail around what was proposed. There were also a few comments about how it might work in practice with questions being posed around whether local authorities had

the resources to check compliance and whether building control bodies should be dealing with planning issues.

49. Of the 14% that opposed the approach, the most frequent comments made were from builders/developers who suggested the existing Part M provisions were satisfactory and/or no evidence had been provided to support higher provisions in the regulations. Again a few comments related to the level at which future regulated standards might be set. In addition, it was suggested it was not clear how planning policy would be enforced under this possible approach or whether it should be left to private sector Approved Inspectors to ensure compliance with local authority requirements.

Table 2: Access - Analysis by Sector

Q12	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	120	61%	3	2%	11	6%	3	2%	33	17%	13	7%	7	4%	0	0%	0	0%	2	1%	47	24%
B	50	25%	3	2%	4	2%	1	1%	13	7%	7	4%	9	5%	3	2%	0	0%	0	0%	10	5%
C	27	14%	10	5%	1	1%	0	0%	5	3%	3	2%	4	2%	0	0%	0	0%	0	0%	4	2%
Total	197	100.0%	16	8%	16	8%	4	2%	51	26%	23	12%	20	10%	3	2%	0	0%	2	1%	61	31%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Accessibility Technical Questions

50. A set of illustrative technical standards was published with the consultation which showed one approach to the detailed technical specification of access standards developed by the review working group.

51. The consultation set out that the proposed three tier Standard was intended to coordinate, simplify and update current accessibility standards into a single set of requirements applicable to new homes of any tenure and sought views on the specific requirements.

52. The requirements were described at three distinct performance levels that provide increasing benefit in terms of accessibility. The three levels were as follows:

- *Level 1* of the Accessibility Standard represents a potential future version of Part M of the Building Regulations

- *Level 2* of the Accessibility Standard represents an intermediate accessible and adaptable housing standard as an alternative to such standards as Habinteg housings Associations' Lifetime Homes Standard

- *Level 3* of the Accessibility Standard represents a revised version of the Wheelchair Housing Design Guide, 2nd Edition 2006, written by Habinteg Housing Association with Stephen Thorpe.

Approach routes

53. The technical standards proposed by the working group suggests revised guidance for all dwellings on the gradient of approach routes, widths for external gates to private and communal entrances, and that approaches to communal entrances should have a width of 1200mm.

Question 1.1 – Would you support the proposed changes to these aspects of guidance? Y/N.
In your view, would introducing these requirements increase costs over and above that within the current Approved Document M of the Building Regulations – please provide reasons for your answer.

54. There were 116 responses with majority (79%) agreeing and stating that there will be either none or a minimal increase in costs, particularly if this implemented through the building regulations so creating a level playing field. Those who

disagreed (21%), suggested that only mandatory approach (ie Building Regulations) would work and highlighted likely increase in costs.

55. The strongest support came from local authorities (23% of responses overall), designers, engineers, surveyors (13%) and a broader group labelled as ‘Other’ (20%). A majority of builders and developers (5% vs.1%) were against this proposal.

			Table QA1: Access - Analysis by Sector																			
QA1.1	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	92	79%	1	1%	7	6%	2	2%	27	23%	15	13%	15	13%	0	0%	1	1%	1	1%	23	20%
NO	24	21%	6	5%	2	2%	0	0%	2	2%	4	3%	1	1%	1	1%	0	0%	1	1%	7	6%
Total	116	100%	7	6%	9	8%	2	2%	29	25%	19	16%	16	14%	1	1%	1	1%	2	2%	30	26%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Car parking

56. Currently, Part M of the Building Regulations provides no specific guidance on car parking provision, gradients, dropping down off and setting down points within new housing development. These are covered by existing higher access standards such as Lifetime homes and Wheelchair Housing Design Guide. The consultation sought views on whether such guidance should be included;

Question 1.2 – Would you support the inclusion of guidance on car parking for all dwellings as set out in the consultation standard?
In your view, would introducing these requirements increase cost to industry - please provide reasons for your answer

57. A majority (73%) of 139 respondents supported introducing guidance on car parking for dwellings though all 7 builders and developers who responded disagreed. There was a clearly expressed view that careful consideration of the use of in curtilage for parking arrangements would be needed to balance Government transport and carbon reduction policies with the needs to plan for disabled people needs and those of an aging population. Those who disagreed (27%) stressed that allocation of space for parking is challenging in modern and urban developments.

QA1.2	Summary		Table QA1: Access - Analysis by Sector																			
			Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	101	73%	0	0%	5	4%	1	1%	28	20%	12	9%	15	11%	0	0%	0	0%	0	0%	40	29%
NO	38	27%	7	5%	2	1%	1	1%	7	5%	6	4%	5	4%	1	1%	0	0%	0	0%	9	6%
Total	139	100%	7	5%	7	5%	2	1%	35	25%	18	13%	20	14%	1	1%	0	0%	0	0%	49	35%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

External lighting and covered entrances

58. The consultation noted that currently most communal entrances are provided with external lighting, and it is considered industry standard practice for the front doors of private dwellings to be capable of accommodating external lighting activated by motion sensors. The technical standard proposed making installation of infra-red activated lighting (PIR) a standard requirement as well as introducing requirements for covered areas to communal entrances.

Question 1.3 - Would you support inclusion of requirements for external lighting and covered communal entrances?

59. There were 153 responses in total with majority (89%) agreeing. All 6 of the property managers who responded agreed, but 4 out of five builders and developers disagreed. The main comments were about lighting being important for safety and security and that such a requirement should apply across all tenures. Some commented on a preference for use of low energy lighting switched by photo-electric cells (dusk to dawn sensors), and not by a passive infrared (PIR) sensor. Remaining respondents (11%) stressed that such details should be dictated by the market and that outside lighting could be a nuisance. Again, the strongest support was expressed by local authorities (20%) and designers, engineers, surveyors (12%). There was no strong opposition from any particular group.

			Table QA1: Access - Analysis by Sector																			
QA1.3	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	136	89%	2	1%	9	6%	2	1%	30	20%	19	12%	18	12%	1	1%	1	1%	1	1%	53	35%
NO	17	11%	6	4%	0	0%	1	1%	2	1%	2	1%	2	1%	0	0%	0	0%	0	0%	4	3%
Total	153	100%	8	5%	9	6%	3	2%	32	21%	21	14%	20	13%	1	1%	1	1%	1	1%	57	37%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Lobbies and double doors

60. The consultation set out that currently, Approved Document M (Access to and use of buildings) of the Building Regulations does not include any guidance on the design of lobbies for private or communal entrances (including on appropriate floor finishes in communal lobby areas), or on how to comply where double doors are adopted. The working group took the view that providing guidance on the design of lobbies and their floor finishes would be useful for designers.

Question 1.4 - Do you think that including this guidance for lobbies in all dwellings would be helpful?

61. Most agreed (84% of 125 respondents) finding this proposal useful and believing the cost would be minimal. Some commented that this would also aid the energy efficiency of a dwelling. Those who disagreed (16%) commented that this would be too prescriptive, onerous and would increase costs. Strongest support came from local authorities (23%), designers, engineers, surveyors (14%) and a broader category labelled as ‘Other’ (25%). No group expressed strong objection.

			Table QA1: Access - Analysis by Sector																			
QA1.4	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	105	84%	3	2%	8	6%	1	1%	29	23%	18	14%	12	10%	0	0%	1	1%	2	2%	31	25%
NO	20	16%	4	3%	0	0%	1	1%	4	3%	3	2%	5	4%	1	1%	0	0%	0	0%	2	2%
Total	125	100%	7	6%	8	6%	2	2%	33	26%	21	17%	17	14%	1	1%	1	1%	2	2%	33	26%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Communal lifts

62. This consultation also sought views about whether standardised requirements for lift sizes (increased from current building regulation size to meet requirements for an eight person lift set out in the Lifetime Home Standard) should be introduced into the baseline standard on the basis that these larger lift sizes are typically adopted by Industry.

Question 1.5 - Do you agree that the lift size set out in the technical standard reflects current industry practice?

63. There were in total 88 responses to this question. Comments from respondents who agreed (74%) were varied. Some said that the size already reflects common practice and therefore there should not be any additional costs. Others stressed that their experience tends to be that developers will put in the smallest and cheapest that they can ‘get away with’. Therefore, there may be initial costs to industry, particularly on smaller sites. However these should potentially reduce over time. There were suggestions that lift sizes should be proportionate to the size of development, ie a larger lift in a larger block of flats.

64. Those who disagreed (26%) mostly sited increase in costs as their reason; some disagreed believing a mandatory approach is needed instead, ie Building Regulations. Again, the strongest supporters were local authorities (14%), designers, engineers, surveyors (17%) and a broader category labelled as ‘Other’ (22%). No group expressed strong objection. Builders/developers tended to disagree with this proposal (6% v. 2%)

QA1.5	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
			Table QA1: Access - Analysis by Sector																			
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	65	74%	2	2%	7	8%	1	1%	12	14%	15	17%	8	9%	0	0%	1	1%	0	0%	19	22%
NO	23	26%	5	6%	1	1%	0	0%	4	5%	3	3%	4	5%	1	1%	0	0%	1	1%	4	5%
Total	88	100%	7	8%	8	9%	1	1%	16	18%	18	20%	12	14%	1	1%	1	1%	1	1%	23	26%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Staircase widths

65. The working group also proposed that a minimum stair width equivalent to the industry standard width of 850mm, should be required at all levels in all new homes. This is narrower than current requirements in Lifetime Home and Wheelchair Standards, but judged to be adequate in enabling installation of a stair lift for a wide range of users.

Question 1.6 - Do you agree that it is appropriate to require a minimum width of 850mm in all new homes?

66. The majority here agreed (71% of 124 replies) with the proposal citing that standardisation would bear down on costs for developers as well as manufacturers. Some of remaining 29% reasoned that a wider standard (900mm) should be adopted instead. Local authorities were the strongest supporters (23%) of this proposal.

QA1.6	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
			Table QA1: Access - Analysis by Sector																			
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	88	71%	1	1%	7	6%	1	1%	29	23%	16	13%	9	7%	0	0%	1	1%	3	2%	21	17%
NO	36	29%	4	3%	3	2%	1	1%	3	2%	5	4%	6	5%	1	1%	0	0%	0	0%	13	10%
Total	124	100%	5	4%	10	8%	2	2%	32	26%	21	17%	15	12%	1	1%	1	1%	3	2%	34	27%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Hall and landing widths

67. The consultation also sought views as to whether guidance on localised obstructions in corridors and hallways should be amended to meet the common requirements at all levels – this is similar to current regulatory requirements but suggests a dimensions of 1000mm from a doorway (where currently the requirement applies only opposite a door way).

Question 1.7 - Do you agree that it is appropriate to amend guidance on hall and landing widths?

68. There were in total 110 responses to this question. The majority (70%) said ‘yes’ on the basis that the proposal has small or no cost implications for developers and builders. Some stated further that if any implications did arise they are likely to impact on landowners. There were some comments highlighting that the issue was more about careful arrangement of space which would also benefit households with buggies or prams as well furniture removals.

69. Amongst those 30% who disagreed, reasons given ranged widely. The main view expressed was that it would affect smaller dwellings (“starter homes”) disproportionately. Some felt that the current Part M was sufficient, other felt the proposed standard should be brought into the building regulations. One view was that this would increase current sizes and property footprints for no justifiable reason. Local authorities, designers, engineers, surveyors and ‘Other’ offered the strongest support (17%, 14% and 19% respectively). Builders and developers were unanimously against this proposition.

			Table QA1: Access - Analysis by Sector																	
QA1.7	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	77	70%	0	0%	7	6%	1	1%	19	17%	15	14%	13	12%	0	0%	1	1%	0	0%	21	19%
NO	33	30%	6	5%	2	2%	1	1%	10	9%	3	3%	2	2%	1	1%	0	0%	0	0%	8	7%
Total	110	100%	6	5%	9	8%	2	2%	29	26%	18	16%	15	14%	1	1%	1	1%	0	0%	29	26%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Services and fixing and mounting heights of switches, stopcocks, controls and handles

70. The working group suggested that wherever possible having service control positions the same across levels would help in simplifying compliance. The technical standard suggests that at level 1 this should include sockets being at least 300mm from the corner of rooms in addition to current regulatory requirements.

Question 1.8 – Would you support this simplification measure?

71. A majority of the 109 respondents (82%) supported this proposal. There was broad agreement was that this is a sensible step and simplification as such should not increase the costs. Additional views expressed by those who supported this measure included, for example, the positioning of switches and sockets which might influence furniture layouts or the positioning of units and that this would therefore also need to be explored. It was suggested that provision of wider doorways throughout a dwelling should be also considered as standard.

72. Less than one fifth (18%) indicated that they did not support the proposal, primarily because such an approach would restrict design and impact on aesthetics and few of these respondents favoured introduction of such a simplification measure into the building regulations.

73. Most supporting responses came from local authorities (19%) and 'Other' (23%). Builders/developers were evenly split (3% and 3%).

			Table QA1: Access - Analysis by Sector																	
QA1.8	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	89	82%	3	3%	9	8%	1	1%	21	19%	15	14%	13	12%	1	1%	1	1%	0	0%	25	23%
NO	20	18%	3	3%	0	0%	1	1%	9	8%	3	3%	1	1%	0	0%	0	0%	0	0%	3	3%
Total	109	100%	6	6%	9	8%	2	2%	30	28%	18	17%	14	13%	1	1%	1	1%	0	0%	28	26%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Other requirements for all areas and level 1 access

74. Other than the changes set out above, the consultation suggested that the performance standards should reflect current regulatory requirements as set out in existing Approved Document M. However, in looking to develop a single three tier standard, the way in which these requirements and provisions were expressed had been changed. The Government was therefore keen to understand whether any of the other guidance for all area or level 1 could increase regulatory requirements or impose cost on Industry.

Question 1.9 - Do any other elements of the working group's suggested technical standard increase requirements above current regulatory minimum?

75. In total there were 68 responses to this question with 57% believing the technical standards increase requirements above current regulatory minimum and 43% not. Homebuilders unanimously felt that there was an impact. Even amongst those who agreed that standards might be higher, the most common comment was that any increase was justified and the standardisation would clear the current conflicting criteria, clarify requirements and accelerate adoption of good practice. Amongst those who disagreed that the proposals increased standards above the minimum and provided additional comment, there was a general view that any marginal increase in technical requirements will be offset by the benefits of consistency.

Table QA1: Access - Analysis by Sector

QA1.9	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	39	57%	6	9%	4	6%	0	0%	6	9%	6	9%	7	10%	0	0%	0	0%	1	1%	9	13%
NO	29	43%	0	0%	2	3%	0	0%	4	6%	5	7%	7	10%	1	1%	0	0%	1	1%	9	13%
Total	68	100%	6	9%	6	9%	0	0%	10	15%	11	16%	14	21%	1	1%	0	0%	2	3%	18	26%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 1.10 - 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**

Question 1.11 – 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 measures by reference number where possible).

76. Most respondent felt that the requirements of the Level 1 standard were about right (49%) or did not go far enough (38%). However, some of this support was qualified and amongst those who said the requirements were about right it was stated that the level 1 Standards could affect development of smaller properties (ie starter homes, one bed flats). Option b) was marginally preferred as a response by builders/developers (4 replies out of 7), whilst 21 local authorities out of 27 felt the requirements are about right.

77. Many of the 38% of consultees who said the proposed requirement did not go far enough suggested that the baseline (regulatory) level should be level 2 because current Part M did not deliver what is required for adaptability to meet the needs of an ageing population. The remaining 13% believed the requirements would go too far and that the current Part M was sufficient – this included 3 out of 7 builder or developers.

78. Further comments given to Question 1.11 suggested a combined, level 1 and level 2, approach; other believed that to simplify the process and construction all homes should be level 2 or level 3. Some felt that the proposed measures were too prescriptive and lacked the flexibility needed to deliver complicated sites. Local flexibility was raised in a number of other replies.

QA1.10	Summary		Table QA1: Access - Analysis by Sector																			
			Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	14	13%	3	3%	2	2%	1	1%	1	1%	1	1%	3	3%	0	0%	0	0%	1	1%	2	2%
B	52	49%	4	4%	3	3%	1	1%	21	20%	8	8%	6	6%	0	0%	0	0%	0	0%	9	8%
C	40	38%	0	0%	4	4%	0	0%	5	5%	10	9%	7	7%	1	1%	0	0%	0	0%	13	12%
Total	106	100%	7	7%	9	8%	2	2%	27	25%	19	18%	16	15%	1	1%	0	0%	1	1%	24	23%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

79. The consultation set out that if a new approach to access standards was taken forward, Government would need to consider whether it would be beneficial to revisit existing guidance in Approved Document M) in order to ensure that language, approach and terminology are easy to understand and consistent across all access standards. In itself, the consultation suggested that this could help industry to comply more easily without imposing or changing existing technical requirements.

Question 1.12 - 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?

80. There was overwhelming agreement (94%) with this proposal from all sectors. The views offered were about the need for clear national standards, which could ultimately create a level playing field. A further common view was that these should be kept in the same place, ie building regulations.

81. Only 6% of respondent disagreed, with five of them offering further comments. These varied from the suggestion that there should be only a single (much higher) standard that should be set out in full in the building regulations; others felt that such a standard should have added flexibility when applied nationally to reflect the need of local demographics and as such would be better placed under separate regimes ie retained as a planning competency.

			Table QA1: Access - Analysis by Sector																			
QA1.12	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	106	94%	6	5%	7	6%	1	1%	31	27%	18	16%	15	13%	0	0%	1	1%	1	1%	26	23%
NO	7	6%	1	1%	2	2%	0	0%	0	0%	1	1%	1	1%	1	1%	0	0%	0	0%	1	1%
Total	113	100%	7	6%	9	8%	1	1%	31	27%	19	17%	16	14%	1	1%	1	1%	1	1%	27	24%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Level 2 intermediate accessibility standard

82. The consultation sought views on a range of specific issues relating to the proposed Level 2 housing standard which is intended to deliver higher accessibility and adaptability than the Level 1 standard, and which includes a range of features to make the most common adaptations easier and less expensive.

Step free access

83. Currently, standards such as Lifetime Homes require step free access, but also permit a range of property types to be considered 'compliant' even where this cannot be achieved. The consultation sought views as to whether only properties providing step free access to a WC, and living accommodation at the entrance level can be considered compliant and suggested that where step free access cannot be achieved, properties should be built to Level 1.

Question 1.13 - Do you agree that level 2 properties should provide step free access and key facilities at ground level?

84. Of 113 respondents 97 (86%) agreed. A majority of respondents added that Level 2 should be the minimum (ie the regulatory standard). Even amongst those who supported this proposal, there was significant support to consider further how this should be applied to dwellings that are not based on the ground floor or do have several floors.

85. Of the 16 (14%) respondents who disagreed most were concerned about whether this requirement could mean mandatory installation of a lift for dwellings with

entrance higher than the ground floor (or an option to later install a stair lift) which could render small developments unviable. Local authorities expressed most support with 30 (27%) replies; there was no strong objection from any group of consultees, though 4% of builders/developers disagreed compared to 2% who agreed.

Table QA1: Access - Analysis by Sector

QA1.13	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	97	86%	2	2%	8	7%	2	2%	30	27%	15	13%	15	13%	0	0%	0	0%	1	1%	24	21%
NO	16	14%	4	4%	2	2%	0	0%	1	1%	2	2%	2	2%	1	1%	0	0%	0	0%	4	4%
Total	113	100%	6	5%	10	9%	2	2%	31	27%	17	15%	17	15%	1	1%	0	0%	1	1%	28	25%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 1.14 - 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:

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

Question 1.15 – 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).

86. The consultation sought overall views as to the proposed level 2 standards fitness for purpose. There were in total 110 replies to this question. Most (76 replies or 69%) agreed with the second statement (b). Strongest support came from local authorities – 24 replies (22%) who primarily were concerned about the need for the requirements to reflect local needs. More technical comments suggested inclusion of additional handrails to entrances and that more windows should be at a height enabling better views when sitting down.

87. The remaining responses were split between a) that the standards go too far (13%) and c) that they do not go far enough (18%). There was no overwhelming support for either of these from any particular group of consultees. However, those who felt the proposals go too far flagged concerns about viability. Those

who felt the proposals do not go far enough believed this is the opportunity to future-proof housing and repeated the call from earlier answers for the Lifetime Homes Standards to be brought within the building regulations as the minimum standard.

88. There were further comments given to Question 1.15. A few suggested that levels 1 and 2 should be combined together to provide a 2-tier standard instead. One commenter believed that the technical standards requirements should be set at least as high as those required in non-residential buildings, ie that handrails are on both sides of steps, lifts to accompany stairs, etc. Another noted that circulation spaces will be too large in small units. A number of respondents provided exact measurements and specifications that they would like to see adopted.

			Table QA1: Access - Analysis by Sector																	
QA1.14	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	14	13%	4	4%	3	3%	0	0%	1	1%	1	1%	3	3%	0	0%	0	0%	0	0%	2	2%
B	76	69%	3	3%	5	5%	2	2%	24	22%	15	14%	10	9%	0	0%	0	0%	1	1%	16	15%
C	20	18%	0	0%	1	1%	0	0%	4	4%	2	2%	3	3%	1	1%	0	0%	0	0%	9	8%
Total	110	100%	7	6%	9	8%	2	2%	29	26%	18	16%	16	15%	1	1%	0	0%	1	1%	27	25%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Level 3 - wheelchair accessible and wheelchair adaptable housing

89. The consultation set out proposals for technical requirements to deliver wheelchair accessible or wheelchair adaptable housing, referred to as Level 3 access.

Question 1.16 - 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:

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

Question 1.17 - 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).

90. Option b) – that the proposals were about right - was selected by 70 (74%) of the 95 respondents. Most stressed the need for local flexibility when applying it. Local authorities (16%) and 'Other' (18%) gave the strongest support. Option c) (doesn't go far enough) received 19% of responses overall. Builders/developers were split almost equally between option a) that the standard goes too far (2 replies) and b) that it is about right (3 replies), with only one response agreeing with c).

91. Of the few comments offered by those who thought the standards went too far the views varied. One view was that the national standard should have local flexibility, while an alternative view did not support a tiered approach. Another respondent stressed that these standards should be developed through Building Regulation. Those who felt that requirements did not go far enough further expressed views that the proposition was a minimum requirement (based on WHDG) and does not accommodate many wheelchair users. Others opined that space standards on the whole were not adequate for a growing population of bariatric cases. A few stressed the need for further study and evidence.

92. Further comments were given to Question 1.17. These covered a broad spectrum of opinions. Opposing views were expressed where some disagreed with the three-tier system believing the current system meets more of the requirements of disabled people. Others believed the proposals did not go far enough to meet the extra space needs of wheelchair users with their family members and carers in their homes. There were comments on level 3 standard adding cost to industry and local authorities not being able to specify additional requirements to accommodate wheelchair users, whose needs go beyond standard, eg using a particularly long or wide wheelchair.

93. Some felt the space standards proposed would not be generous enough. Other stated that level 3 properties should be only single storey houses or flats. One reply stressed that further consultation and research should be undertaken on the level 3 and above standards. As previously, a number of respondents provided exact measurements and specifications that they would like to see adopted.

Table QA1: Access - Analysis by Sector

QA1.16	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	7	7%	2	2%	1	1%	0	0%	1	1%	0	0%	2	2%	0	0%	0	0%	0	0%	1	1%
B	70	74%	3	3%	6	6%	2	2%	15	16%	17	18%	9	9%	0	0%	0	0%	1	1%	17	18%
C	18	19%	1	1%	2	2%	0	0%	4	4%	1	1%	2	2%	1	1%	0	0%	0	0%	7	7%
Total	95	100%	6	6%	9	9%	2	2%	20	21%	18	19%	13	14%	1	1%	0	0%	1	1%	25	26%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 1.18 - Do you agree that improved evidence of wheelchair users housing needs is necessary?

94. An overwhelming majority agreed (83% of 109 respondents) that further evidence is required to maintain and develop wheelchair standards. Some pointed at evidence and guidance available from Mind the Step (Habinteg Housing Association) and the British Standard 8300 committee which oversee development of standards on access. A number of respondents called for a national standard. Most support came from local authorities (20%) and ‘Other’ (22%).

95. The remaining 17% reasoned that the research evidence already exists. Of the few comments a couple pointed out research supporting requirements for 10% wheelchair housing across Greater London.

Table QA1: Access - Analysis by Sector

QA1.18	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	91	83%	5	5%	9	8%	2	2%	22	20%	14	13%	14	13%	0	0%	0	0%	1	1%	24	22%
NO	18	17%	1	1%	0	0%	0	0%	7	6%	4	4%	1	1%	1	1%	0	0%	1	1%	3	3%
Total	109	100%	6	6%	9	8%	2	2%	29	27%	18	17%	15	14%	1	1%	0	0%	2	2%	27	25%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 1.19 - If DCLG was to lead on this research, would you or your organisation be able and willing to collaborate in such a project?

96. A large number of organisations and individuals offered collaboration with 84 out of 109 agreeing to further involvement.

			Table QA1: Access - Analysis by Sector																			
QA1.19	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	84	77%	5	5%	8	7%	1	1%	16	15%	16	15%	18	17%	0	0%	1	1%	1	1%	18	17%
NO	25	23%	1	1%	1	1%	1	1%	6	6%	3	3%	3	3%	1	1%	0	0%	0	0%	9	8%
Total	109	100%	6	6%	9	8%	2	2%	22	20%	19	17%	21	19%	1	1%	1	1%	1	1%	27	25%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

97. The consultation set out that Within the Level 3 standard there is a clear distinction made between wheelchair adaptable housing and wheelchair accessible housing and sought views as to whether the differentiation was appropriate.

Question 1.20 - Do you agree with the working group's proposed differentiation between wheelchair accessible and wheelchair adaptable housing?

98. A significant majority of 89 (86%) out of all 103 replies agreed that clear definition of both types of housing would be beneficial. A quarter of support came from local authorities (26%). There were a further 24 comments offered. Some stressed that it was imperative to set out from the early stages of design what was required in terms of the necessary footprint, critical circulation space and general design principles. Other suggestion included that when an accessible home is provided (irrelevant of tenure) the cost difference should be payable by the developer on completion and reserved in a fund for future adaptations within the relevant local authority. Another view was that local authorities should be able to require additional measures within their planning process until further research shows them to be ineffective or unnecessary.

99. Fourteen respondents (14%) disagreed. A few comments stressed that a better approach would be through purely adopting a wheelchair adaptable design approach as the specific needs of future wheelchair user are not always known.

Builders/developers were split with 2% of respondents supporting and 5% being against the working group proposed differentiation.

			Table QA1: Access - Analysis by Sector																	
QA1.20	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	89	86%	2	2%	8	8%	2	2%	27	26%	15	15%	14	14%	1	1%	0	0%	2	2%	18	17%
NO	14	14%	5	5%	1	1%	0	0%	2	2%	1	1%	2	2%	0	0%	0	0%	0	0%	3	3%
Total	103	100%	7	7%	9	9%	2	2%	29	28%	16	16%	16	16%	1	1%	0	0%	2	2%	21	20%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Chapter 2: Space

100. Chapter 2 of the consultation document considered whether there is any need for the introduction or use of space standards applied to new housing in the future.

101. The consultation also set out the role that space labelling could play in improving consumer choice in the new housing market in addition to, or as an alternative to space standards, and sought views on the benefits of standardising application of space standards in order to reduce cost and complexity.

Question 13 – Would you support government working with industry to promote space labelling of new homes?

102. The consultation sought views on whether improving information on the size of homes for consumers (referred to as space labelling) would be supported. There were 249 responses to this question with 88% agreeing with the proposed approach of government working with industry in promoting space labelling of new homes. This support was reflected across all the different sectors that responded. However, there were a wider range of views as to how this should be achieved which varied from adopting a voluntary industry scheme to mandatory regulation to enable a genuinely informed consumer choice. Most builders and developers who responded supported this proposal in principle.

103. Most agreed that this information would help consumers in general with tenants and student residents benefiting in particular. Some respondents felt that this information already exists but possibly could be improved with standardised, consistent and clear presentation; some suggested using the existing Energy Performance Certificate system; others took the view that existing homes should be included in any space labelling approach as well.

104. There were mixed views as to whether benchmarks would be useful or not; some respondents believed space labelling distracts from the need for actual space standards whilst others cautioned against setting a minimum space standard overall. The need for clear labelling of storage space and allowing for varied furniture sizes was also highlighted as important as was the view that clear space labelling could address ambiguous descriptions of space use in dwellings, their layout and/or quality. This was considered potentially valuable for disabled people in particular when making housing choices.

105. At the same time, 29 respondents (12%) did not support the proposal; some felt that this information is already available through sales literature or as part of EPC assessment. Others believed that space labelling would not have any influence in purchase decisions sighting other economic factors which drive decision making. A number of respondents stressed that only mandatory regulations would have any impact.

			Table 3: Space - Analysis by Sector																	
Q13	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	**220**	**88%**	17	**7%**	19	**8%**	8	3%	46	18%	28	11%	25	10%	4	2%	0	0%	4	2%	67	27%
NO	**29**	**12%**	1	**0%**	0	**0%**	0	0%	12	5%	2	1%	3	1%	2	1%	0	0%	0	0%	9	4%
Total	**249**	**100.00%**	18	**7%**	19	**8%**	8	**3%**	58	**23%**	30	**12%**	28	**11%**	6	**2%**	0	**0%**	4	**2%**	76	**31%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

106. The consultation also set out how a range of ways in which this space labelling could be taken forward, including using a very simple metric such as the gross internal areas (GIA) of the home and sought views as to whether this might be an acceptable approach.

Question 14 - Do you agree with this suggested simple approach to space labelling?

107. A significant majority agreed with the suggested approach (77%) and, similar to responses to Question 13, the importance of clarity and consistency was highlighted with some stressing a need for mandatory regulations to ensure this is the case. A majority of homebuilders/developers (15 out 17) who responded agreed with this proposal. At the same time some consultees sounded caution not to add to the already existing regulatory burden. Others suggested that that space labelling should not be seen as alternative to space standards themselves and be applied to all type of properties irrespective of tenure, old and new.

108. Some respondents highlighted the fact that space alone cannot guarantee quality suggesting that it is sometimes the way the property is laid out/designed and also the availability of storage which cause space issues.

109. The use of GIA was generally supported but some respondents were not sure about the use of the precise metrics used and inclusion of bathrooms, kitchens and en-suites. Others believe bedrooms and a breakdown of storage should be provided in addition to the basic GIA, and additionally, a number of respondents made the distinction that space does not necessary equal accessibility and that additional information on accessibility would be required, such as whether the property has step-free approach, downstairs toilet etc.

110. Of those who disagreed with the simple approach (23%) the reasons given ranged from doubts whether a voluntary approach would work to suggestions that some form of space comparators / benchmarking would be required to set good practice standards.

			Table 3: Space - Analysis by Sector																	
Q14	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacture r / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	187	77%	15	6%	17	7%	7	3%	48	20%	23	10%	21	9%	3	1%	0	0%	4	2%	48	20%
NO	55	23%	2	1%	1	0%	1	0%	13	5%	5	2%	10	4%	2	1%	0	0%	0	0%	21	9%
Total	242	100.00%	17	7%	18	7%	8	3%	61	25%	28	12%	31	13%	5	2%	0	0%	4	2%	69	29%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

111. The consultation also recognised that over recent years a wide range of alternatives had been proposed including various benchmarking or consumer marking schemes, and sought views as to what alternatives consultation respondents might choose to adopt.

Question 15 - What alternative approach would you propose?

112. There were a number of suggested alternative approaches including: detailed breakdown of functional spaces; describing a property in terms of bed spaces rather than bedrooms; utilising Energy Performance Certificates; a need for benchmarking and extending space labelling to the second hand market; adopting an A-E or similar scale (as with energy efficiency of products); presenting property price as costs per square meter for the ease of comparison; a star rating system, linked to costs this; reference to the German model on space labelling ie standards of *Deutsche Industrie Norm* (DIN); requirements for 3D space labelling, as height of a room plays an important role. There was some interest in extending space labelling to include labelling for energy and carbon.

Question 16 - Would you support requirements for space labelling as an alternative to imposing space standards on new development?

113. The majority of those 74% who expressed disagreement with a space labelling only approach suggested that space labelling could not ensure household's needs better met on its own and preferred space labelling as well as space standards. Some suggested labelling as a step towards minimum standards; others said no action needed (either standards or labelling) as customers are best placed to make decisions when viewing properties. Two thirds of home builders and developers who responded believed space labelling was preferable to the introduction of space standards.

114. One view expressed was that having specific minimum space standards would allow smaller low cost / low energy homes to be built. Another respondent sounded caution about consumers' interpretation of space labelling – specifically that a certain level of knowledge would be needed to interpret the information and suggested that if this is the case a safeguard for the public would be to introduce minimum standards.

115. Some respondents believed that space labelling would bring in a level playing field for all types and tenures of development and expressed the view that this would benefit all concerned as it will enable developers to have cost certainty at the earliest stage of a development and speed up the development process through standardisation and reduction of risk.

116. We also received 2847 email responses from the Royal Institute of British Architects (RIBA) Space and Light campaign which did not support this proposal. All respondents said:

> *"No. Better marketing information with the amount of space in the home is useful. But Britain has not been building enough homes for decades and therefore there is little choice in the new build housing market. I support space labelling but only together with a minimum space standard."*

			Table 3: Space - Analysis by Sector																			
Q16	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	**61**	**26%**	13	**6%**	6	**3%**	1	0%	10	4%	4	2%	10	4%	3	1%	0	0%	0	0%	14	6%
NO	**171**	**74%**	7	**3%**	11	**5%**	6	3%	49	21%	24	10%	18	8%	3	1%	0	0%	1	0%	51	22%
Total	**232**	**100.00%**	20	**9%**	17	**7%**	7	**3%**	59	**25%**	28	**12%**	28	**12%**	6	**3%**	0	**0%**	1	**0%**	65	**28%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 17 - Would you support the introduction of a benchmark against which the space labelling of new properties is rated?

117. Views split (for 72%; against 28%) – on balance, those who expressed a supporting view favoured some form of benchmark though what that should be varied considerably, with some favouring industry led interventions and others government regulation. That not in favour sighted over complexity and bureaucracy as reasons that this would not work for consumers; that it could place restrictions on innovation by homebuilders and that this would in effect become a de-facto space standard.

			Table 3: Space - Analysis by Sector																			
Q17	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	**153**	**72%**	7	**3%**	12	**6%**	7	3%	40	19%	21	10%	18	8%	4	2%	0	0%	0	0%	44	21%
NO	**59**	**28%**	13	**6%**	2	**1%**	0	0%	16	8%	4	2%	6	3%	1	0%	0	0%	1	0%	16	8%
Total	**212**	**100.00%**	20	**9%**	14	**7%**	7	**3%**	56	**26%**	25	**12%**	24	**11%**	5	**2%**	0	**0%**	1	**0%**	60	**28%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 18 – Consultees were asked which of the following statements best represented their view:

> **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.**

118. A wide range of views were offered. Some felt that market forces should drive provision with 24% believing local authorities should not be allowed to impose space standard but a majority (70%) believed that local authorities should be able to determine whether space standards should be required. There was strong support for a national approach, and many took the view that an option for government regulation should be offered.

119. 13 out of 16 of the home builders and developers who responded chose option a, preferring that local authorities should not be permitted to require space standards. Property managers were evenly split between option a, and option c, whilst 45 out of 60 local authorities and about three quarters of all other respondents also supported local authority space standards, with most preferring them to be applied cross tenure.

120. There was also strong support for application across tenure to meet needs of greater movements between tenures over time and concerns about space standards in high density development. Builders/developers generally opposed local application siting impact on land availability, affordability, supply and interference in market forces. Viability was flagged as a critical test if adoption of space standards was to be permitted. There was some disagreement on linking space standards to accessibility.

			Table 3: Space - Analysis by Sector																	
Q18	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	57	24%	13	5%	9	4%	0	0%	12	5%	7	3%	9	4%	0	0%	0	0%	0	0%	7	3%
B	15	6%	0	0%	0	0%	1	0%	3	1%	2	1%	4	2%	0	0%	0	0%	0	0%	5	2%
C	165	70%	3	1%	9	4%	7	3%	45	19%	19	8%	16	7%	7	3%	0	0%	2	1%	55	23%
Total	237	100%	16	7%	18	8%	8	3%	60	25%	28	12%	29	12%	7	3%	0	0%	2	1%	67	28%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 19 - 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?

121. A majority agreed with this proposal (80%). Some suggested this should be a minimum with local authorities enabled to go further. Others proposed that local authorities should have complete discretion on requirements, and some felt that space standards should be brought into building regulations.

122. Homebuilders expressed strong disagreement with most taking the view that the introduction of a national space standard will reduce the quantum of new homes delivered to market (given that the supply of land is constrained under the current planning system) and that this would also increase costs, making housing less affordable and reducing consumer choice. Those who disagreed with the proposal (20%) stated that local discretion should only be acceptable where the need to intervene in market delivery was firmly based in evidence of market failure.

123. We also received 2847 email responses from the Royal Institute of British Architects (RIBA) Space and Light campaign which supported this proposal. All respondents said:

"Yes – but it should go further.

I believe that all homes in England should be required to meet minimum space standards and urge the Government to take action through this consultation. Britain has the smallest homes in Western Europe and a national space standard is necessary to ensure homes provide peace and privacy for children to study and play, room for families to grow and homes that are flexible enough to adapt to the needs of our ageing population.

Local authorities should be able to set space standards in order to improve new build homes in their communities. However, I believe that the most effective solution would be for a national space standard to be applied through Building Regulations so that it applies to all homes, in every location and type of housing."

Q19	Summary		Table 3: Space - Analysis by Sector: Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	**199**	**80%**	7	**3%**	13	**5%**	6	2%	48	19%	28	11%	23	9%	6	2%	1	0%	1	0%	65	26%
NO	**49**	**20%**	12	**5%**	5	**2%**	2	1%	13	5%	2	1%	7	3%	0	0%	0	0%	0	0%	8	3%
Total	**248**	**100.00%**	19	**8%**	18	**7%**	8	**3%**	61	**25%**	30	**12%**	30	**12%**	6	**2%**	1	**0%**	1	**0%**	73	**29%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 20 – Do you agree with the proposed limiting of the scope of any potential space standard to internal aspects only?

124. Whilst some respondents expressed total disagreement with the need for any form of space standards in their replies, a slim majority (54%) who expressed an opinion believed that external space was important; that policy should be set at a national level (in some form) and in many cases wanted scope of space standards extended to cover external space (particularly for balconies in flatted development). However a significant minority (46%) believed that external private space should remain a matter for planning policy given that provision varies considerably between different types of local housing developments and markets. Bin recycling and waste storage also was flagged as an important consideration.

Q20	Summary		Table 3: Space - Analysis by Sector: Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	**103**	**46%**	8	**4%**	9	**4%**	4	2%	31	14%	11	5%	10	5%	2	1%	0	0%	1	0%	27	12%
NO	**119**	**54%**	7	**3%**	6	**3%**	4	2%	29	13%	14	6%	19	9%	4	2%	0	0%	0	0%	35	16%
Total	**222**	**100.00%**	15	**7%**	15	**7%**	8	**4%**	60	**27%**	25	**11%**	29	**13%**	6	**3%**	0	**0%**	1	**0%**	62	**28%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Costs and viability

Question 21 - 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?

125. There was strong support (62%) for space standards to be included in local plans, other than homebuilders and developers who were largely against this with 13 opposing and only 3 supporting application of standards through local plans. Many of those who supported application of space standards suggested that minimum standards should be included in building Regulations rather than planning policy to create a level playing field and remove the costs to local authorities of extensive testing and evidence using consultants. A number of respondent suggested that the Level 1 standard should be the minimum, with Levels 2 and 3 available for local authority to use where deemed necessary. A number of local authorities and planning bodies raised concerns about the resource needed to evidence decisions to adopt space standards through the local plan making process.

126. Views were divided about whether local plans most suitable way to test these requirements with most homebuilders entirely opposed to space standards. Whilst there was general recognition of the importance of viability, views were divided as to whether viability should be permitted to compromise standards and there was concern that linking space standards and access standards could limit the number of accessible homes built.

Table 3: Space - Analysis by Sector

Q21	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	79	38%	3	1%	12	6%	4	2%	21	10%	5	2%	7	3%	6	3%	0	0%	0	0%	20	10%
NO	127	62%	13	6%	5	2%	4	2%	36	17%	18	9%	15	7%	0	0%	0	0%	1	0%	34	17%
Total	206	100.00%	16	8%	17	8%	8	4%	57	28%	23	11%	22	11%	6	3%	0	0%	1	0%	54	26%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 22 – 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?

Question 22 – b) Do stakeholders agree with the extra over unit costs we have used for the current and proposed space standards?

Question 22 – c) Do stakeholders agree with the proportion of homes we have estimated to have taken up space standards in the “do nothing” and “option 2” alternatives?

127. Only 18 responses were given to question a) without support evidence for any of the above statements. The predominant opinion (83%) was that additional cost was likely to be reflected in changes to land value, particularly if space standards were introduced in a form which was non-negotiable. Some homebuilders disputed that any costs could be recovered and a number of respondents stressed that to reach any conclusive position further evidence and data are required.

128. Two thirds of only 8 responses to questions b) agreed with our estimates of the cost of homes that were currently required to meet space standards, whilst nearly three quarters (73%) agreed with the consultation estimate of the proportion of new homes built to space standards.

			Table 3: Space - Analysis by Sector																			
Q22A	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	15	83%	2	11%	2	11%	0	0%	4	22%	3	17%	1	6%	0	0%	0	0%	0	0%	3	17%
NO	3	17%	1	6%	1	6%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	1	6%
Total	18	100.00%	3	17%	3	17%	0	0%	4	22%	3	17%	1	6%	0	0%	0	0%	0	0%	4	22%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Q22B	Summary		Table 3: Space - Analysis by Sector																			
			Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	5	63%	1	13%	1	13%	0	0%	2	25%	0	0%	1	13%	0	0%	0	0%	0	0%	0	0%
NO	3	38%	1	13%	1	13%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	1	13%
Total	8	100.00%	2	25%	2	25%	0	0%	2	25%	0	0%	1	13%	0	0%	0	0%	0	0%	1	13%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Q22C	Summary		Table 3: Space - Analysis by Sector																			
			Builders / Developers		Property Managemen t		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufactur er / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	8	73%	1	9%	2	18%	0	0%	3	27%	1	9%	1	9%	0	0%	0	0%	0	0%	0	0%
NO	3	27%	2	18%	1	9%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	11	100.00%	3	27%	3	27%	0	0%	3	27%	1	9%	1	9%	0	0%	0	0%	0	0%	0	0%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 23 - 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?

129. Not much evidence was submitted in response to this question with some respondents stressing that identifying exact costs is likely to be a challenge.

Question 24 – How many local authorities are currently requiring space standards, and what those space standard requirements might be?

130. There were 76 responses to this question (including London Planning Authorities), providing information on local authority policies which required some form of space standards.

Further evidence and comments

Question 25 asked consultees to provide evidence of the following:

> **a) Distribution of the size of current private and affordable housing development?**
> **b) Space standards required by local authorities stating what is required and by whom?**
> **c) Likely cost impact of space standards?**

131. There were 24 submissions to this request. Most evidence was on distribution of the size of affordable and private housing stock (54%). One-third around space standards and remaining 17% on cost impacts of space standards.

			Table 3: Space - Analysis by Sector																	
Q25	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	13	54%	1	4%	1	4%	0	0%	1	4%	1	4%	2	8%	0	0%	0	0%	0	0%	7	29%
B	7	29%	0	0%	1	4%	0	0%	2	8%	1	4%	1	4%	0	0%	0	0%	0	0%	2	8%
C	4	17%	0	0%	1	4%	0	0%	0	0%	0	0%	2	8%	0	0%	0	0%	0	0%	1	4%
Total	24	100%	1	4%	3	13%	0	0%	3	13%	2	8%	5	21%	0	0%	0	0%	0	0%	10	42%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Waste storage

132. In addition Chapter 2 considered space for the storage of household waste outside new homes, and invited views on whether, and how, Part H6 of the Building Regulations and the supporting statutory guidance on the design of waste storage might be updated to prevent bins dominating street frontages or contributing to increased levels of anti-social nuisance such as odour or litter, sometimes referred to as “bin blight”.

Question 26 – What issues or material do you consider need be included in H6 of the Building Regulations, in order to address the issues identified above?

133. One hundred and seventy people, approximately 31% of those responding to the consultation, provided views. The comments were wide ranging but several themes were identified.

134. Over half (57%) of respondents provided comments on matters that influence cost-effective bin store provision and use, and so address the potential for bin blight, including recycling facilities, communal bins, bin store location, security, aesthetics and kerbside hardstandings. Some (8%) respondents made specific comments on accessibility and a similar number suggested adding internal waste storage requirements from the Code for Sustainble Homes.

135. The current approach of using both planning and building regulations to regulate solid waste storage was supported by several (16%) respondents and a further 5% highlighted the need for solid waste storage to be integrated into the overall design at an early juncture. Some respondents (8%), in particular developers, considered that waste should not be covered by building regulations but they were opposed by a few others (2%) who considered that it should only be a building regulations issue.

136. About a third of responses (32%) encouraged storage provision matched to waste authority collection practices although a few also identified that the resultant bin storage may not be adequate if authority collections change in the future.

137. Several (13%) respondents, mainly local authorities, considered that bin blight was an issue for existing older properties and that there was no evidence to indicate that bin blight affects new properties.

138. Some (7%) respondents suggested that there should be a single, national approach to waste collection, which would enable national standards for waste storage to be developed.

Cycle storage

139. The consultation set out that government places a high degree of importance in promoting cycling and that the National Planning Policy Framework sets out policies for local authorities to plan for and encourage sustainable modes of transport, such as cycling.

140. The consultation set out that government thinks this is a better approach to providing suitable cycle storage rather than including detailed guidance within the suite of standards relating to the energy performance of new homes, which the government proposes later on in the consultation should be absorbed into Part L of the Building Regulations.

Question 27 – Do you agree with this approach to managing cycle storage?

141. Of the total 232 responses, majority (62%) agreed with the proposal. A shared view was that provision for cycle storage is important in promoting uptake of cycling and enabling a move towards more sustainable transport modes and carbon reduction. Further agreement was that this provision should be part of the design stage. Some suggested that continuing to include cycle parking within Local Development Plans will allow standards to be tailored to local circumstances and more naturally would sit within planning. A number of comments were about scalability and intelligent design to avoid cycle storage being underused. Some felt that provision of cycle storage has strong links to security and safety considerations; others believed that the provision should be included within Part L as an important element of sustainable housing. Strongest support came from respondents' categories 'Other' (19%) and local authorities (14%).

142. Amongst those who disagreed (38%) the main reason given was that the Government should demonstrate its commitment to promoting cycling and increasing the number of cyclists. Therefore, national standards contained within Building regulations would be preferred, providing they are introduced at an appropriate level. Some felt that developers would not provide any storage on a voluntary bases as a cost saving. On the other hand, some feared cycle storage would add to street clutter.

			Table 3: Space - Analysis by Sector																			
Q27	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacture r / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	143	62%	9	4%	14	6%	4	2%	33	14%	13	6%	18	8%	6	3%	1	0%	0	0%	45	19%
NO	89	38%	12	5%	3	1%	1	0%	16	7%	7	3%	9	4%	2	1%	0	0%	0	0%	39	17%
Total	232	100.00%	21	9%	17	7%	5	2%	49	21%	20	9%	27	12%	8	3%	1	0%	0	0%	84	36%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Space technical questions

143. The model space standard in the illustrative technical standard documents issued with the consultation set out a range of minimum Gross Internal Areas which are capable of accommodating a standard range of activities, using a standard set of internal furniture and assuming a given number of people are living in that home. It was also proposed by both the space and accessibility industry working groups that accessibility standards should be amalgamated with space standards to reduce the complexity of compliance in developing a range of standards house types.

Question 2.1 – Do you agree that any space standards, if adopted, should be co-ordinated with the requirements of relevant accessibility standards?

144. There were 128 responses with a majority (85%) supporting this approach. However, many respondents cautioned against an overly complex, multi-level approach creating contradictions. There was varying levels of support from different sectors, however, local authorities, 'Other' and designers, engineers and surveyors were the strongest with 23%, 21% and 16% of the total respectively supporting the link between access and space.

145. Those who disagreed (15%), questioned the link between space and access, particularly at Level 2 and 3 and pointed out that the Part M already defines the minimum necessary space without the need for further standards. Builders/developers views were split equally between those who agreed and those who did not agree with linking the two standards together (4% vs. 4%)

			Table QA2: Space - Analysis by Sector																			
QA2.1	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	109	85%	5	4%	7	5%	2	2%	30	23%	20	16%	16	13%	2	2%	0	0%	0	0%	27	21%
NO	19	15%	5	4%	2	2%	0	0%	5	4%	0	0%	1	1%	0	0%	0	0%	0	0%	5	4%
Total	128	100%	10	8%	9	7%	2	2%	35	27%	20	16%	17	13%	2	2%	0	0%	0	0%	32	25%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Gross internal areas

The consultation set out the way in which a space standard might have progressive levels of space depending on the type of property, number of occupants and links to accessibility standards and sought views on these proposals,

Question 2.2 - Do you agree with the Gross Internal Areas indicated at Level 1, 2 and 3, shown in Table A1-3

146. There were 91 responses which were split almost evenly. Of those who disagreed with the proposed standards (54%) the key reasons given were typically that the proposed Level 1 standards fall short of existing space standards and should consider potential occupancy rather than assumptions based upon bedroom numbers. Of the 46% who agreed with the proposed requirements quite a few caveated that although they agreed with the proposed Level 1 standard, Level 2 and 3 could be more generous, referring to HQI and LHDG standards instead. Local authorities (12%), designers, engineers, surveyors (10%) and a wider group labelled ‘Other’ (12%) were the strongest supporters.

			Table QA2: Space - Analysis by Sector																	
QA2.2	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	42	46%	2	2%	4	4%	1	1%	11	12%	9	10%	3	3%	1	1%	0	0%	0	0%	11	12%
NO	49	54%	6	7%	4	4%	1	1%	11	12%	8	9%	7	8%	1	1%	0	0%	0	0%	11	12%
Total	91	100%	8	9%	8	9%	2	2%	22	24%	17	19%	10	11%	2	2%	0	0%	0	0%	22	24%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 2.3 - 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?

147. There were 102 responses in total with the majority (72%) agreeing. Main comments were again around the risk of proposed sizes not being adequate and the need to move away from classification by a number of bedrooms. Strongest support came from a category labelled as ‘Other’ (21%), local authorities (16%) and from designers, engineers, surveyors (15%).

148. In the group that disagreed (28%), strongest objectors were also local authorities (10%). Majority of builders and developers (6%) disagreed, stating they preferred a market led approach.

			Table QA2: Space - Analysis by Sector																			
QA2.3	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	73	72%	2	2%	8	8%	2	2%	16	16%	15	15%	7	7%	1	1%	0	0%	0	0%	21	21%
NO	29	28%	6	6%	1	1%	0	0%	10	10%	2	2%	6	6%	0	0%	0	0%	0	0%	4	4%
Total	102	100%	8	8%	9	9%	2	2%	26	25%	17	17%	13	13%	1	1%	0	0%	0	0%	25	25%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 2.4 - 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

Question 2.5 – 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).

149. The total number of responses (79) was split: a) - 16%; b) - 44%; c) - 39%. Builders/developers agreed with a) almost unanimously (6 out of 7 replies). Local authorities and designers, engineers and surveyors were split almost evenly between b) and c) within their respective response groups.

150. Question 2.5 asked for further comments from those who were chose option a) as their answer. There was a wide range of observations submitted: that figures for 3 bedroom level 1 and 2 look particularly small; level 1 standards are below Lifetime Homes Standard and are therefore not considered adequate; that small flats would not provide for a small family in terms of storage space, drying areas or general living space; that the requirements for space do not account for extra equipment required by disabled people

151. Some felt that introduction of such standard would make developers job more complicated; other believed that there should not be minimum standards at all. Alignment with the London Plan and HQI was flagged up in few replies. One suggestion offered was to remove single bed space bedrooms, with all bedrooms having double occupancy. A more long-term view was expressed that the proposals could see a reduction in smaller, affordable homes being constructed, in favour of larger homes where compliance with the standard is more easily achieved. It also was stressed that consideration should be given to setting standards for other living spaces.

Table QA2: Space - Analysis by Sector

QA2.4	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	13	16%	6	8%	1	1%	0	0%	0	0%	0	0%	1	1%	0	0%	0	0%	0	0%	5	6%
B	35	44%	0	0%	3	4%	1	1%	11	14%	7	9%	4	5%	0	0%	0	0%	0	0%	9	11%
C	31	39%	1	1%	3	4%	1	1%	10	13%	8	10%	1	1%	1	1%	0	0%	0	0%	6	8%
Total	79	100%	7	9%	7	9%	2	3%	21	27%	15	19%	6	8%	1	1%	0	0%	0	0%	20	25%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 2.6 - Are the performance requirements for level 2 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

Question 2.7 – 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).

152. The majority here agreed that performance requirements for level 2 are about right (68% of total 78 replies) citing that they are broadly in line with the London Housing Design Guide and existing Lifetime Homes guidance. Support was particularly strong amongst local authorities (14 out of 17); designers and engineers (12 out of 16) and property managers (5 out of 7) who felt the standards were about right. The rest were split evenly between a) (17%) where respondents typically felt that there should be no minimum standard which included all 6 builders and developers, and c) (15%) with respondents also

wanting compliance with Lifetime Home Standards or British Standard BS9266 in addition to the suggested gross internal areas. Again, local authorities (18%), designers, engineers, surveyors (15%) were the strongest supporters of statement b). Builders/developers (8%) unanimously felt that the proposed standards go too far, and should be reduced.

153. The comments provided to Question 2.7 were fairly limited, mostly indicating that responses given to Questions 2.5 and 2.6 already covered this ground.

			Table QA2: Space - Analysis by Sector																	
QA2.6	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	13	17%	6	8%	1	1%	0	0%	0	0%	0	0%	3	4%	0	0%	0	0%	0	0%	3	4%
B	53	68%	0	0%	5	6%	1	1%	14	18%	12	15%	6	8%	0	0%	0	0%	0	0%	15	19%
C	12	15%	0	0%	1	1%	1	1%	3	4%	4	5%	0	0%	1	1%	0	0%	0	0%	2	3%
Total	78	100%	6	8%	7	9%	2	3%	17	22%	16	21%	9	12%	1	1%	0	0%	0	0%	20	26%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 2.8 – Are the performance requirements for level 3 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

Question 2.9 – 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).

154. The majority of respondents agreed that performance requirements are set at broadly the right level choosing option b) (73% of total 71 replies).Support was particularly strong amongst local authorities, designers, property managers and special interest groups. Amongst those who answered a) that standards go too far (14%) were four out of five homebuilders and developers who suggested that the homebuilding industry neither needs nor can afford this standard. Amongst those who answered c) that the standards do not go far enough (13%) there were suggestions that for disabled people who rely on support and have larger

more cumbersome wheelchairs, the standard does not go far enough.

155. Comments provided to additional Question 2.9 were very limited. While some felt that space requirements were already well dealt with within Building Regulations Part M; others believed that proposed standard did not go far enough and should be aligned with London Plan and London Housing Design Guide.

			Table QA2: Space - Analysis by Sector																			
QA2.8	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	10	14%	4	6%	1	1%	0	0%	0	0%	0	0%	3	4%	0	0%	0	0%	0	0%	2	3%
B	52	73%	1	1%	5	7%	1	1%	14	20%	9	13%	7	10%	0	0%	0	0%	0	0%	15	21%
C	9	13%	0	0%	1	1%	1	1%	1	1%	3	4%	0	0%	1	1%	0	0%	0	0%	2	3%
Total	71	100%	5	7%	5	10%	2	3%	15	21%	12	17%	10	14%	1	1%	0	0%	0	0%	19	27%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Chapter 3: Security

156. Chapter 3 of the consultation document considered what security standards, if any, should be required in new homes and sought views as to whether these standards should be applied locally or nationally.

Question 28 - 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

157. There were 271 responses to this question. Of those, the majority (85%) believed that domestic security for new homes should be covered by national standards or building regulations given the impact they can have on reducing crime, particularly burglary. This support was reflected across all the different sectors that responded. Many of the responses, especially police bodies, suggested that security should be addressed in a single national standard such as Secured by Design or by introducing Building Regulation to the same level. Some respondents mentioned a lack of interest by the insurance and warranty sectors in driving better security standards previously and that if left to market forces there was a feeling that the cheapest option would be adopted leading to less secure new homes.

158. Of the 15% that suggested security should continue to be left to the market, a variety of comments were provided to support this view. In particular, there was a belief that the current approach to security was satisfactory. Allied to this, there was a concern that any increased standardisation may actually undermine the effectiveness of security measures as criminals develop techniques to overcome standard types of security fitting.

			Table 4: Security - Analysis by Sector																			
Q28	Summary		Builders / Developers		Property Managemen t		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacture r / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	**229**	**85%**	10	**4%**	16	**6%**	4	1%	41	15%	20	7%	25	9%	3	1%	2	1%	7	3%	99	37%
B	**42**	**15%**	4	**1%**	2	**1%**	2	1%	15	6%	5	2%	3	1%	3	1%	0	0%	0	0%	8	3%
Total	**271**	**100.00%**	14	**5%**	18	**7%**	6	**2%**	56	**21%**	25	**9%**	28	**10%**	6	**2%**	2	**1%**	7	**3%**	107	**39%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 29 Part 1:- Do you think there is a need for security standards?

159. The majority of the 277 respondents (86%) supported the need for security standards. Generally, comments were similar to those made to the previous question and there was support for security standards across most sectors (although the opinion of builders/developers was evenly split). Again many made the point that good security standards have helped reduce crime in both old and new developments over the years. Support was also argued in terms of sustainability with developments that have poor security costing more to maintain, including a higher proportion of void properties, and suffering disproportionate health and well-being costs. Conversely, it was again argued, particularly by homebuilders, property management and certain specific interest groups that as at least 80% of new homes were already built to NHBC warranty standards there did not seem a need for additional security standards.

			Table 4: Security - Analysis by Sector																			
Q29 Part 1	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacture r / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	**238**	**86%**	9	**3%**	17	**6%**	6	2%	46	17%	20	7%	25	9%	6	2%	2	1%	7	3%	99	36%
NO	**39**	**14%**	9	**3%**	2	**1%**	2	1%	12	4%	3	1%	4	1%	0	0%	0	0%	0	0%	7	3%
Total	**277**	**100.00%**	18	**6%**	19	**7%**	8	**3%**	58	**21%**	23	**8%**	29	**10%**	6	**2%**	2	**1%**	7	**3%**	106	**38%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 29 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.

160. There were 201 responses to this question with a significant majority (72%) supporting option1 - a baseline standard and a higher standard available for use by local authorities through planning. Many commented that while a national minimum standard was essential, levels of crime can vary significantly and therefore the ability to apply higher standards where necessary was welcome.

161. However, of those that supported option 1, a number felt setting the baseline level for doors and windows equivalent to the NHBC warranty standard was too low. As an alternative, it was suggested that a baseline minimum standard equivalent to Publicly Available Specification PAS 24:2012 (the door standard within the higher level of security in the illustrative technical standards) would be more appropriate and would better meet Secured by Design requirements.

162. Just over a quarter (28%) indicated that they favoured a single enhanced standard to be applied locally. A number did so on the basis that they believed a single security standard provided a simpler approach to security. However, a number that favoured option 2 did so whilst still expressing reservations about it as an option. In particular, there was significant concern that the enhanced standard would not apply everywhere and further concerns that even this enhanced standard did not provide standards of security equivalent to that which already exist through Secured by Design, for example, by not considering wider issues such as site layout and lighting. A number of respondents questioned the future security and social implications of tagging areas as low or high crime, as crime is known to travel across boundaries and is often opportunistic.

Q29 Part 2	Summary		Table 4: Security - Analysis by Sector																	
			Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	**144**	**72%**	5	**2%**	12	**6%**	6	3%	29	14%	16	8%	17	8%	5	2%	2	1%	4	2%	47	23%
B	**57**	**28%**	0	**0%**	2	**1%**	0	0%	7	3%	3	1%	6	3%	1	0%	0	0%	3	1%	35	17%
Total	**201**	**100.00%**	5	**2%**	14	**7%**	6	**3%**	36	**18%**	19	**9%**	23	**11%**	6	**3%**	2	**1%**	7	**3%**	82	**41%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 30 - 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?

163. There were 193 responses to this question with an even split between the two approaches. While the question relates to how a level 2 standard might apply, a number of respondents chose to restate their view that there was not a case for a level 2 standard at all - many suggesting just a mandatory single baseline standard which should be higher than the proposed level 1.

164. Of those that agreed with the level 2 standard being applied on a broad local basis, a variety of comments were made. It was argued that keeping this approach clearly set out within the local planning policy would simplify the process and provide the clarity and consistency needed. Conversely others felt that assessing each development on a case-by-case basis would take up further local authority time and resources and could result in a lack of clarity or consistency in to how standards were applied in different areas.

165. Those that supported a development-by-development approach pointed out this option would allow individual local circumstances to be better considered, as crime rates can vary hugely across local authority areas and therefore higher standards should be considered at an even more local/micro level. Furthermore, it was argued that different household types may require higher security standards (for example, housing for vulnerable adults and older people). However, again there was the recognition that this could have resource implications for local authorities.

166. More generally, there were some comments which questioned whether local planners were best placed to ascertain ever-changing crime and security risks within specific areas. Currently Crime Prevention Design Advisors and Architectural Liaison Officers, provide such advice on a development-by-development basis under the Secured by Design Scheme, but it was questioned whether similar advice might be available in the future if a very different approach to security was decided on.

			Table 4: Security - Analysis by Sector																			
Q30	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	**96**	**50%**	3	**2%**	7	**4%**	4	2%	19	10%	11	6%	11	6%	1	1%	1	1%	3	2%	36	19%
B	**97**	**50%**	5	**3%**	9	**5%**	0	0%	15	8%	6	3%	11	6%	4	2%	0	0%	3	2%	43	22%
Total	**193**	**100.00%**	8	**4%**	16	**8%**	4	**2%**	34	**18%**	17	**9%**	22	**11%**	5	**3%**	1	**1%**	6	**3%**	79	**41%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 31 - 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'?

167. There were 232 responses to this question with 65% believing there would be benefit in integrating security standards into the building regulations. Of those that supported this approach, a number cited the approach taken in Scotland as an example of how security can successfully be integrated into a regulated approach. This, it was argued, would reduce inconsistency and provide an inspection framework to monitor compliance and in turn simplify the building process as developers understood what is required and can cost accordingly from the design stage. In addition, some felt standardisation of security standards would be of use to both manufactures and developers alike, by providing a standardisation of security products and lower costs due to economies of scale.

168. However, 35% of respondents opposed a regulated approach. Many were for reasons already previously outlined in relation to a security standard more generally, for example, that it should be left to the market or that they disagreed with the actual standard or with the number of standards. More specifically, a number suggested that local authority building control officers would require extensive training to carry out this work. Some suggested there needed to be a continuing role for Police Crime Prevention Design Advisors or Code Assessors

in any future checking process.

169. Further concerns of some respondents (including those supporting as well as those opposing) was around the ability of a regulated system to respond in a timely manner to evolving crime risks. It was suggested that this was something that would need to be kept under regular review to ensure regulatory standards continued to be robust and effective.

			Table 4: Security - Analysis by Sector																	
Q31	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	150	65%	8	3%	15	6%	4	2%	27	12%	12	5%	13	6%	3	1%	2	1%	6	3%	59	25%
NO	82	35%	9	4%	2	1%	2	1%	18	8%	8	3%	12	5%	3	1%	0	0%	1	0%	27	12%
Total	232	100.00%	17	7%	17	7%	6	3%	45	19%	20	9%	25	11%	6	3%	2	1%	7	3%	86	37%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 32 - Q1: 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?

170. Of the 192 responses to this question, an overwhelming number (92%) of those indicated support for option B with a mandatory baseline for all properties and a level 2 'regulated option' for use by local authorities.

171. Comments largely repeated earlier points made in relation to the need for standards, what those standards should be and how they should be delivered. They largely focused, therefore, on more general concerns, for example, around the proposed mandatory level 1 standard being too low a baseline. There were also a number of respondents who did not support either option and felt both fell short of providing a safe and secure living environment and acceptable security measures for a new dwelling.

			Table 4: Security - Analysis by Sector																			
Q32	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	**16**	**8%**	2	**1%**	2	**1%**	0	0%	1	1%	3	2%	3	2%	1	1%	0	0%	0	0%	4	2%
B	**176**	**92%**	9	**5%**	11	**6%**	6	3%	39	20%	15	8%	15	8%	3	2%	2	1%	6	3%	69	36%
Total	**192**	**100.00%**	11	**6%**	13	**7%**	6	**3%**	40	**21%**	18	**9%**	18	**9%**	4	**2%**	2	**1%**	6	**3%**	73	**38%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 33 - Do you agree with the overall costs as set out in the accompanying impact assessment?
If you do not agree, then do you have evidence to support alternative figures?

172. Question 33 to 39 sought evidence and views on the cost and assumptions that form the basis of the Impact Assessment that was published alongside the consultation. The views and evidence provided will inform any future Impact Assessment. Generally, there were fewer than half the numbers of responses to this set of questions than there was for the previous security-related questions.

173. Question 33 was a more general one asking whether consultees agreed with the overall costs contained in the Impact Assessment. There were 85 responses to this question with (79%) of these disagreeing with the costs used. Of those that disagreed and commented, a large number felt that costs had been overestimated with many suggesting the costings available on the Secured by Design website would provide a more appropriate basis for any assessment. A few however felt that the costs were underestimated. Some suggested this overestimation was because the Impact Assessment did not take into account the increased number of security products being produced to Secured by Design standards which has resulted in lower costs.

174. Further to this, responses also suggested the analysis was flawed as it primarily focused on burglary with insufficient consideration given to other types of crime that occur around homes. Similarly, it was argued the wider society benefits of incorporating security measures in new homes from the beginning had been overlooked. Two builders/developers suggested that the costs had actually been underestimated.

Question 34 - Do you agree that level 1 security reflects current industry practice?
If you do not agree, then do you have evidence to support an alternative view?

175. There were 123 responses to this question with 57% agreeing that the proposed level 1 security standard reflected current practice. Of those that commented, a number chose to reiterate the point that, whilst this might be the current practice, it doesn't necessarily mean that this standard is sufficient. It was also pointed out that although this reflected industry practice for private housing, social housing was generally built to a different and higher standard, that is, incorporating Code for Sustainable Homes security standards.

176. Of the 43% that disagreed, many of the associated comments made more general points about the adequacy of a security standard at that level, although a number questioned whether the NHBC standard was applied as widely as suggested.

			Table 4: Security - Analysis by Sector																	
Q34	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	70	57%	8	7%	5	4%	0	0%	9	7%	8	7%	7	6%	4	3%	1	1%	4	3%	23	19%
NO	53	43%	2	2%	3	2%	0	0%	3	2%	4	3%	10	8%	0	0%	0	0%	0	0%	31	25%
Total	123	100.00%	10	8%	8	7%	0	0%	12	10%	12	10%	17	14%	4	3%	1	1%	4	3%	54	44%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 35 - Do you agree with the assumptions used to derive the extra over cost of Secured by Design as set out?
If you do not agree, then do you have evidence to support alternative figures?

177. There were 97 responses to this question with 79 of these disagreeing and 18 agreeing. Comments were similar in vein to those in response to Question 33 with a widely held view that the costs had been over-estimated in the Impact Assessment. Many of the comments provided more detailed points about the methodology used to arrive at these costs, but it was commonly suggested that earlier work undertaken by Davis Langdon that looked at the costs of Secured by Design provided a more accurate estimate of the cost associated with incorporating security measures in new homes.

			Table 4: Security - Analysis by Sector																			
Q35	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	18	19%	3	3%	4	4%	1	1%	3	3%	2	2%	0	0%	1	1%	0	0%	1	1%	3	3%
NO	79	81%	4	4%	2	2%	0	0%	4	4%	3	3%	12	12%	0	0%	1	1%	2	2%	51	53%
Total	97	100.00%	7	7%	6	6%	1	1%	7	7%	5	5%	12	12%	1	1%	1	1%	3	3%	54	56%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 36 - Do you agree with the number of homes which incorporate Secured by Design standards that have been used in the accompanying impact assessment?
If you do not agree, then do you have evidence to support alternative figures?

178. There were 80 responses to this question, with 83% of those disagreeing with the assessment of the number of new homes which incorporate Secured by Design standards in the Impact Assessment. Generally, of those that disagreed, there was a belief that the Impact Assessment significantly under-estimated the number of new homes built to Secured by Design standards (with a figure of 40,000 rather than 4,000 commonly suggested). A further reason put forward for this underestimation was that new developments were being built to Section 2 of Secured by Design standards, but not being assessed.

179. A number of police authorities also provided figures for the number of properties incorporating Secured by Design in their own area. Again, many respondents suggested that figures available from the Secured by Design website should have been used.

Q36	Summary		Table 4: Security - Analysis by Sector																			
			Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	14	18%	2	3%	3	4%	0	0%	4	5%	2	3%	0	0%	1	1%	0	0%	0	0%	2	3%
NO	66	83%	4	5%	3	4%	0	0%	1	1%	1	1%	9	11%	0	0%	1	1%	2	3%	45	56%
Total	80	100.00%	6	8%	6	8%	0	0%	5	6%	3	4%	9	11%	1	1%	1	1%	2	3%	47	59%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 37 - 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?
If you do not agree, then do you have evidence to support alternative figures?

180. There were 86 responses to this question with 81% of respondents stating they disagreed with the assumptions contained in the Impact Assessment about the future use of Secured by Design. There was a variety of comments in support of these responses. Most commonly it was suggested that the Impact Assessment needed to draw upon the information from the Secured by Design website[1].

181. A number made the point that assumptions about growth were undermined by the assessment of existing take-up (as dealt with in Question 35). Others made the point that with more suppliers gaining accreditation and a wider range of available products, market forces would bring component costs down resulting in lower prices and more choice. Consequently, more homes would be built to the Secured by Design standard and the rate would increase as previously seen over the last 14 years.

182. However, others were more cautious about future growth levels. It was suggested that existing take-up in social housing was driven by a desire to secure points under the Code for Sustainable Homes. It was also suggested that the Secured by Design standard was used to gain funding for a development.

[1] www.securedbydesign.com

183. A number of respondents made the more general point that if the incentive for developers to include standards such as those prescribed by Secured by Design, and supported by the Code for Sustainable Homes, were withdrawn this would naturally lead to a fall in security standards.

			Table 4: Security - Analysis by Sector																			
Q37	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	16	19%	2	2%	3	3%	0	0%	4	5%	2	2%	0	0%	2	2%	0	0%	0	0%	3	3%
NO	70	81%	7	8%	2	2%	0	0%	1	1%	3	3%	11	13%	0	0%	1	1%	2	2%	43	50%
Total	86	100.00%	9	10%	5	6%	0	0%	5	6%	5	6%	11	13%	2	2%	1	1%	2	2%	46	53%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 38 - Do you agree with the assumptions for the 'take up' of the proposed security standards in the accompanying Impact Assessment? If you do not agree, then do you have an alternative estimate that can be supported by robust data?

184. There were 79 responses to this question, with 82% of respondents disagreeing with the assumptions for the take-up of the proposed security standards. Respondents felt that there was a danger in making such assumptions without the use of robust data with a number again suggesting looking at the Secured by Design website.

			Table 4: Security - Analysis by Sector																			
Q38	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	14	18%	1	1%	4	5%	0	0%	3	4%	2	3%	0	0%	1	1%	0	0%	0	0%	3	4%
NO	65	82%	7	9%	1	1%	0	0%	1	1%	1	1%	9	11%	0	0%	1	1%	2	3%	43	54%
Total	79	100.00%	8	10%	5	6%	0	0%	4	5%	3	4%	9	11%	1	1%	1	1%	2	3%	46	58%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 39 - Do you agree with the unit costs as set out in the accompanying impact assessment for the” do nothing” and “option 2” alternatives?
If you do not agree, please provide evidence to support alternative figures for us to include in the final impact assessment?

185. There were 80 responses to this question with 84% disagreeing. Many of the responses referred directly to comments made on earlier questions with the remainder largely simply repeating previously made arguments.

			Table 4: Security - Analysis by Sector																	
Q39	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	13	16%	2	3%	2	3%	0	0%	2	3%	2	3%	0	0%	1	1%	0	0%	0	0%	4	5%
NO	67	84%	6	8%	2	3%	0	0%	2	3%	2	3%	9	11%	0	0%	1	1%	2	3%	43	54%
Total	80	100.00%	8	10%	4	5%	0	0%	4	5%	4	5%	9	11%	1	1%	1	1%	2	3%	47	59%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Security technical questions

Question 3.1 - 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

186. The consultation sought views on the proposed performance standards for the baseline standard. There were 119 responses to the general question about whether the proposed baseline standards were pitched at the right level. Of these, 47 responses (39%) indicated that they believed that proposals were about right. Of the 13% of respondents to this question that believed the proposed baseline standard went too far, eight of the 19 were from local authorities. The majority of 57, however, suggested the baseline standard did not go far enough. In particular, 38 of the 52 responses from "other" bodies indicated this to be the case. It should be noted that 35 of these 38 responses came from police bodies or their employees.

			Table QA3: Security - Analysis by Sector																			
QA3.1	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	15	13%	3	3%	0	0%	0	0%	8	7%	1	1%	1	1%	0	0%	0	0%	0	0%	2	2%
B	47	39%	2	2%	7	6%	1	1%	8	7%	7	6%	7	6%	0	0%	0	0%	3	3%	12	10%
C	57	48%	0	0%	3	3%	0	0%	3	3%	5	4%	5	4%	1	1%	1	1%	1	1%	38	32%
Total	119	100.00%	5	4%	10	8%	1	1%	19	16%	13	11%	13	11%	1	1%	1	1%	4	3%	52	44%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 3.2 - 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).

187. Of those that viewed the proposed baseline standard as going too far, this was mainly because there was concern about bringing security within the building

regulations because of the associated complexity (this was particularly the view from local authorities who suggested the standard went too far). A number of others did not support the baseline standard because they believed that NHBC security requirements were already largely dealing with the issue in new homes or felt that security should be left to market forces.

188. Of those that disagreed and believed the standards did not go far enough, there was concern that the baseline standards would not actually deliver the security benefits intended and would provide inferior protection to that achieved through Secured by Design – something which it was suggested could be proven to have delivered real benefits. The Association of Chief Police Officers provided further detailed comments to support the views expressed above as well as detailed, technical comments on the proposed standard (which they did not agree with) that would need attention/clarification if it were to be retained. One product manufacturer also suggested that it was not sufficient to require products to simply "comply" with a certain standard, rather that third-party certification was necessary.

Question 3.3 - 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

189. The consultation sought views on the performance requirements for the enhanced security standard. In relation to whether the higher proposed standard was set at the right level, the responses were broadly in line with the split of opinion at QA3.1 with 13%, primarily builder and developers and local authorities, suggesting standards went too far. There were 48 responses (42%) that said standards were about right - these mainly came from designers and special interest groups. Further 50 respondents (44%) stated that the standards did not go far enough; of these the majority of 40 replies came from police crime prevention officers or members of the police service.

QA3.3	Summary		Table QA3: Security - Analysis by Sector																	
			Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	15	13%	3	3%	0	0%	0	0%	6	5%	1	1%	1	1%	0	0%	0	0%	0	0%	4	4%
B	48	42%	2	2%	6	5%	1	1%	7	6%	10	9%	9	8%	0	0%	0	0%	3	3%	10	9%
C	50	44%	0	0%	2	2%	0	0%	3	3%	3	3%	4	4%	1	1%	1	1%	1	1%	35	31%
Total	113	100.00%	5	4%	8	7%	1	1%	16	14%	14	12%	14	12%	1	1%	1	1%	4	4%	49	43%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 3.4 - 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).

190. Of the 50 respondents that suggested the proposed higher standard did not go far enough, the majority said that although they recognised this standard was based “loosely” on Secured by Design, the absence of a requirement for third-party certification was a major failure. It was argued that without this the proposed standard could not be considered to deliver the benefits that Secured by Design had over the years.

191. Of the 15 responses which said the proposed standard went too far, comments almost entirely referred back to their response to QA3.2, simply stated disagreement with the need for a higher standard or said security should be left to the market. One response said they would need to be satisfied as to the availability of suitable products before they could be persuaded to support a higher security standard.

Chapter 4: Water efficiency

192. Chapter 4 of the consultation considered water efficiency standards in new homes. The consultation set out the Government's commitment to manage the overall demand for water sustainably. Whilst new homes account for only a relatively small amount of total water consumption, the additional demand they represent can be significant at a local level, particularly in areas of water scarcity.

193. Minimum water efficiency standards were introduced into the building regulations in 2010. In addition, local planning authorities can currently require tighter water standards. The consultation considered what water efficiency standards, if any, should be applied to new housing in the future.

Question 40 - Do you agree a national water efficiency standard for all new homes should continue to be set out in the Building Regulations?

194. The building regulations currently require that all new homes are designed so that their calculated water use is no more than 125 litres per person per day (l/p/d). The consultation sought views on whether there should continue to be a national minimum standard set out through regulation in this way.

195. There were 267 responses to this question. Of those, 96% agreed that there should continue to be a water efficiency standard set out in the building regulations. This support was reflected across all the different sectors that responded and included almost unanimous support from those builders/developers that responded to this question. However, within that more general support there were significantly different views as to the form that regulation should take and the level it should be set. These are explored in more detail in the analysis to the further questions below.

196. Of the 11 responses that opposed the approach, a variety of reasons were given as to why the proposal was not supported. Four respondents said this was because they favoured the Code continuing to play a more prominent role in relation to standards in new homes. Other reasons put forward were that demand was better being managed by charges rather than regulation and concern that existing provisions were unenforceable and easily undermined by the subsequent retrofitting of less efficient fittings.

			Table 5: Water - Analysis by Sector																			
Q40	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	256	96%	20	7%	16	6%	6	2%	69	26%	26	10%	27	10%	7	3%	1	0%	4	1%	79	30%
NO	11	4%	1	0%	0	0%	1	0%	2	1%	0	0%	2	1%	2	1%	0	0%	0	0%	3	1%
Total	267	100.00%	21	8%	16	6%	7	3%	71	27%	26	10%	29	11%	9	3%	1	0%	4	1%	82	31%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 41 - Do you agree that standards should be set in terms of both the whole-house and fittings-based approaches?

197. Both the Code for Sustainable Homes and the Building Regulations use a “whole-house” methodology to set a water efficiency standard using the Water Efficiency Calculator for New Dwellings (the “Water Calculator”). The calculation employs use factors and water fitting performance to estimate average water use for a typical person. This provides flexibility for the housebuilder (as different combinations of performance can be specified), but there are costs associated with understanding how this works and then doing the calculations. To reduce the potential burden, the consultation proposed that future water efficiency standards should also be set in terms of a minimum water performance standards for all fittings (which produce an equivalent level of water efficiency). This would set the maximum flow rate and volumes that would be acceptable and would not require use of the Water Calculator.

198. There were 248 responses to this question and again there was overwhelming support for the proposal to set a water efficiency standard in terms of both the whole-house and the fittings-based approaches. Overall, almost four-fifths of responses supported the proposal with a majority of respondents from each of the different sectors being in favour. This included 18 of the 20 builders/developers that responded. This reflected a more general acceptance that a dual approach to setting standards maintained flexibility whilst providing greater simplicity for some. The one note of caution from those that supported the proposals was that the use of a whole-house approach has the potential for offsetting of one sort of fittings for another with the implication for energy and carbon where the less efficient fitting was one that used hot water, for example, showers.

199. Indeed this was a concern cited by many of those that did not favour a dual approach and also formed part of the reasoning for those that also suggested that the Water Calculator was fundamentally flawed. Other respondents suggested they favoured maintaining the current approach (based on the whole-house approach only) with some fearing a change would just further complicate matters. Of the different sectors, it was local authority respondents who were least in favour of the proposed approach (although a majority (44 of 67) were still in favour). A particular concern of many local authorities was that there would be problems because fittings are rarely specified at early design stage and the fittings approach would therefore be specified as "the easy option", but bespoke fittings would subsequently be chosen making enforcement difficult.

			Table 5: Water - Analysis by Sector																			
Q41	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	195	79%	18	7%	13	5%	6	2%	44	18%	20	8%	20	8%	4	2%	0	0%	4	2%	65	26%
NO	53	21%	2	1%	3	1%	1	0%	23	9%	4	2%	6	2%	4	2%	0	0%	0	0%	10	4%
Total	248	100.00%	20	8%	16	6%	7	3%	67	27%	24	10%	26	10%	8	3%	0	0%	4	2%	75	30%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 42 - Do you agree that the national minimum standard set in the Building Regulations should remain at the current Part G level? (see also Question 43)

200. The consultation proposed that the national minimum standard provided through the Building Regulations should remain set at 125 l/p/d. There were 233 responses to this and overall there was less consensus to the proposal than the previous questions with 57% supporting and 43% opposing.

201. Of those that favoured the proposal, the primary qualification was that the standard was adequate for the time being, but should be subject to a further review in the future in the light of better understanding of levels of compliance, actual delivered performance and any consequent problems with this and other levels of water efficiency.

202. Of those that disagreed with the proposal, the overwhelming reason given was that the minimum standard in the building regulations should be tighter and in line with that already being required in many local authorities (and in the majority of

London boroughs) equivalent to Code Level 3 of 110 l/p/d (including external water use). It was argued that homebuilders could easily meet this tighter water efficiency standard and could do so at little, or no, additional cost. A number also observed that a tighter national standard was what was suggested by the Housing Standards Review Challenge Panel (who had also made recommendations on future housing standards prior to the consultation being published). A small number of respondents also suggested that even more ambitious targets should be required through regulation.

Q42	Summary		Table 5: Water - Analysis by Sector: Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	132	57%	15	6%	10	4%	3	1%	31	13%	12	5%	16	7%	7	3%	0	0%	3	1%	35	15%
NO	101	43%	6	3%	6	3%	4	2%	32	14%	10	4%	8	3%	2	1%	0	0%	0	0%	32	14%
Total	233	100.00%	21	9%	16	7%	7	3%	63	27%	22	9%	24	10%	9	4%	0	0%	3	1%	67	29%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 43 - Do you agree that there should be an additional local standard set at the proposed level?

203. The consultation proposed that, in addition to the national regulated minimum standard, there should be the possibility for a tighter water efficiency being set locally through planning of 110 l/p/d (including external water use). There were 235 responses to this question with responses being fairly evenly split. A similar divide was noted across most of the sectors, although it was notable that only two of the 22 responses from builders/developers favoured the proposed approach.

204. Of the 119 respondents that supported the proposal, a number made qualifications to that agreement – most often that an even tighter standard than 110 l/p/d should be available. Another suggested variation was that where this local standard could/should be used should be determined nationally with the radon risk maps being cited as an example of how this might work in a number of responses. A small number added that a regional approach would often be more appropriate than a local one given the nature of the problem being addressed. A further point was that local authorities needed to be able to take an integrated approach to addressing both water efficiency and surface water management

issues in new housing developments.

205. There were 116 respondents that opposed the proposed approach. Of those that commented, the most common reason given was that the standards review should be about rationalising the number of standards and therefore only one national regulated standard should exist. Similarly, the legitimacy of imposing different levels of use on different parts of the country was questioned. A number of respondents also stated that it should remain the responsibility of the water companies to ensure that they had the infrastructure in place to meet their demand needs and that imposing even tighter limits on new housing was therefore unjust.

			Table 5: Water - Analysis by Sector																			
Q43	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	119	51%	2	1%	12	5%	1	0%	36	15%	11	5%	9	4%	4	2%	0	0%	1	0%	43	18%
NO	116	49%	20	9%	6	3%	5	2%	27	11%	12	5%	12	5%	5	2%	0	0%	2	1%	26	11%
Total	235	100.00%	22	9%	18	8%	6	3%	63	27%	23	10%	21	9%	9	4%	0	0%	3	1%	69	29%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 44 - Do you agree that no different or higher water efficiency standards should be able to be required?

206. The consultation proposed that no standards other than the 110 l/p/d one should be able to be imposed locally. In particular, the consultation explained that requirements linked to higher Code Levels would generally require either rainwater harvesting or greywater recycling to be specified with the result of a significant additional cost per unit.

207. Again, responses to this question were fairly evenly balanced. Of the 226 responses, 112 respondents supported the proposed restriction. This included support from 18 of the 21 responses from builders/developers. There was also strong support from designers/engineers/surveyors, the property management sector and from specific interest bodies.

208. There were 114 responses that expressed disagreement with the proposed approach. However, from some of the comments of those who did not agree, it appears that a significant minority of those responses might have responded on

the basis that it was proposed that no additional local standards might be possible (as opposed to the proposal that an additional local standard was acceptable, but only at the one level specified). Of the others who opposed the proposed approach the main reason was that water efficiency was of such importance in some areas that even tighter standards were necessary. A number also pointed to the likelihood that the price of water recycling would continue to fall making the imposition of such standards less costly for developers. Some also questioned the premise that performance standards tighter than 110 l/p/d could only be delivered by recourse to water recycling technologies.

Table 5: Water - Analysis by Sector

Q44	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	**No.**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**
YES	**112**	**50%**	18	**8%**	12	**5%**	3	1%	22	10%	13	6%	13	6%	3	1%	0	0%	2	1%	26	12%
NO	**114**	**50%**	3	**1%**	6	**3%**	3	1%	35	15%	10	4%	9	4%	6	3%	0	0%	2	1%	39	17%
Total	**226**	**100.00%**	21	**9%**	18	**8%**	6	**3%**	57	**25%**	23	**10%**	22	**10%**	9	**4%**	0	**0%**	4	**2%**	65	**29%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 45 - Would you prefer a single, tighter national baseline rather than the proposed national limit plus local variation?

209. As an alternative to the proposed approach (a national regulated standard of 125 l/pd with the possibility of a nationally described standard imposed locally through planning of 110 l/p/d), the Department also sought views on the idea of a single tighter water efficiency standard of 110 l/p/d being required for all new homes through regulation with no ability for tighter standards being imposed locally.

210. A majority (55%) indicated that they would not favour such an approach. Of those that commented, the reasons mostly fell into one of two opposed camps – either that the suggestion did not go far enough and even higher standards should be possible locally or that such an approach would be unduly onerous and national regulation at that level could not be supported.

211. Of the 45% that supported this possible approach, the most frequent comment was that the current national standard set through Part G of the Building Regulations was too low (albeit with many additional comments that then conditioned agreement subject to no additional local standards being possible or subject to additional local standards continuing to be available). In addition, there

were a number of other reasons offered in support of the change including its simplicity and the fact that it can be done at relatively little cost (and with consequent savings on the cost of water and energy for the homeowner). It was also pointed out that such an approach was favoured by the Housing Standards Review Challenge Panel in their report.

Table 5: Water - Analysis by Sector

Q45	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	**No.**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**
YES	**97**	**45%**	7	**3%**	4	**2%**	5	2%	26	12%	16	7%	5	2%	4	2%	0	0%	1	0%	28	13%
NO	**120**	**55%**	10	**5%**	12	**6%**	2	1%	30	14%	8	4%	13	6%	5	2%	0	0%	2	1%	38	18%
Total	**217**	**100.00%**	17	**8%**	16	**7%**	7	**3%**	56	**26%**	24	**11%**	18	**8%**	9	**4%**	0	**0%**	3	**1%**	66	**30%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 46 - 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?

212. The consultation proposed that the use of a tighter water efficiency standard by a local authority should be subject to them demonstrating a clear need for such a standard and that the approach is consistent with the water resources management plan of the water supplier. In addition, the water undertaker should be consulted along with the Environment Agency and developers.

213. There was overall support for the approach with 65% in favour and 35% opposed. However, within that, 11 of the 18 builders/developers that responded opposed the approach, primarily on the basis that they believed it should be for the water undertakers to invest to meet demand and that it was therefore inappropriate to focus local water efficiency measures on new homes.

214. Other respondents who disagreed opposed the approach for a variety of other reasons. A number suggested that the focus on the water efficiency element in terms of justifying the approach overlooked the fact that tighter standards would also deliver lower water and energy costs for occupiers as well as a reduction in carbon. Others favoured the application of tighter local standards being determined at the national level. There were additional concerns about the additional costs for local authorities while others argued additional conditions

should not be imposed on local authorities that have already adopted such a strategy locally.

215. Of those that supported the proposed approach, a number indicated that they did so only on the basis that if they had to have local standards, then restrictions should be in place. Similarly, a number said they supported the proposal, but indicated that they actually favoured national prescription of where tighter levels should be possible. Conversely, a number said they supported the approach on the condition that standards at national and local levels were tighter than proposed in the consultation. Again a number of respondents pointed out that some local authorities had already adopted tighter water standards which would have involved consultation and scrutiny, although a number of other respondents thought more guidance/clarity was needed about the evidence that would be needed to demonstrate a clear need. Given the focus of the measure, it should be noted that 44 of the 57 local authorities that responded supported the proposed conditions on the use of local water efficiency standards.

			Table 5: Water - Analysis by Sector																			
Q46	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	135	65%	7	3%	13	6%	2	1%	44	21%	9	4%	11	5%	5	2%	0	0%	3	1%	40	19%
NO	72	35%	11	5%	1	0%	3	1%	13	6%	11	5%	8	4%	3	1%	0	0%	0	0%	22	11%
Total	207	100.00%	18	9%	14	7%	5	2%	57	28%	20	10%	19	9%	8	4%	0	0%	3	1%	62	30%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 47 - Should there be any additional further restrictions / conditions?

216. Of the 202 responses to this question, 72% indicated that no additional restrictions or conditions were necessary. Of those that responded “yes”, the vast majority appear to have misinterpreted the question and actually suggested things that might condition/restrict development rather than what was questioned, that is, whether the use of tighter, local standards should be restricted/conditioned further than suggested in the proposal covered by Question 46. Comments focused, therefore, on more general issues such as the need for the water efficiency standards to evolve with time, the need to link more closely with requirements on surface water management and the possibility of water efficiency standards that would continue to promote the use of water recycling.

Q47	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
			Table 5: Water - Analysis by Sector																			
Option	**No.**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**
YES	**56**	**28%**	3	**1%**	2	**1%**	2	1%	7	3%	12	6%	7	3%	0	0%	0	0%	1	0%	22	11%
NO	**146**	**72%**	16	**8%**	14	**7%**	4	2%	44	22%	9	4%	12	6%	7	3%	0	0%	1	0%	38	19%
Total	**202**	**100.00%**	19	**9%**	16	**8%**	6	**3%**	51	**25%**	21	**10%**	19	**9%**	7	**3%**	0	**0%**	2	**1%**	60	**30%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 48 - Do you agree with the unit costs as set out in the accompanying Impact Assessment for the "do nothing" and "option 2" alternatives? If you do not agree, please provide the evidence to support your alternative figures

217. The consultation sought views on the Department's initial assessment of the costs associated with the current and proposed future approach to water efficiency standards.

218. There were 67 responses in total with 29 agreeing and 38 disagreeing. As indicated in the consultation document, the views and evidence provided will be used to inform any future Impact Assessment. One of the main arguments put forward was that the cost of water efficiency (above the current regulated minimum) had been overstated. It was argued that not only could a standard of 110 l/p/d (equivalent to Code Level 3) be achieved at no additional cost, but also that the cost of meeting the highest Code Levels had also been overstated (particularly in the case of two responses from local authorities that stated water recycling was not necessary). In relation to these highest Code Levels, the point was also made that the costs would be further reduced where water re-use was part of a communal system and/or where it is a by-product of an integrated approach that included Sustainable Drainage Systems (SUDS). In addition to comments regarding the direct costs of meeting these standards, a number of respondents suggested that the associated "process" costs had also been overstated. A further point that was made was that costs should not be viewed too narrowly and purely in relation to the potential costs on homebuilders, with better consideration needing to be given to the opportunity cost of not imposing tighter water efficiency standards.

Q48	Summary		Table 5: Water - Analysis by Sector																			
			Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	29	43%	3	4%	3	4%	1	1%	8	12%	2	3%	2	3%	2	3%	0	0%	1	1%	7	10%
NO	38	57%	7	10%	2	3%	1	1%	3	4%	4	6%	6	9%	1	1%	0	0%	0	0%	14	21%
Total	67	100.00%	10	15%	5	7%	2	3%	11	16%	6	9%	8	12%	3	4%	0	0%	1	1%	21	31%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 49 - Do you agree with the number of homes which we estimate will incorporate the proposed tighter water standard in the accompanying Impact Assessment? If you do not agree, please provide the evidence to support your alternative figures.

219. The consultation sought views on the assumptions underlying the Impact Assessment around the likely take-up of tighter water efficiency standards. This showed that half, 23 of the 46, respondents agreed with this assumption. Of those that did not agree, many respondents made more general comments, although a number indicated that the assumption was believed to be on the low side.

Q49	Summary		Table 5: Water - Analysis by Sector																			
			Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	23	50%	4	9%	3	7%	0	0%	3	7%	4	9%	2	4%	0	0%	0	0%	0	0%	7	15%
NO	23	50%	3	7%	1	2%	0	0%	1	2%	2	4%	6	13%	1	2%	0	0%	0	0%	9	20%
Total	46	100.00%	7	15%	4	9%	0	0%	4	9%	6	13%	8	17%	1	2%	0	0%	0	0%	16	35%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 50 - Do you currently require through planning that new homes are built to a higher standard of water efficiency than required by the building regulations through:

> **a) a more general requirement to build to Code Level 3 or above?**
> **Or**
> **b) a water-specific planning requirement?**
> **And**
> **c) are you likely to introduce or continue with a water-specific water efficiency standard (beyond the building regulations) in the future?**

220. This question sought to gather more specific evidence regarding local authorities' existing and likely future policy approaches in relation to local water efficiency standards. 49 local authorities responded to this question. Of these, 39 indicated that they required a standard above that set out in the building regulations through a more general requirement that new homes in their area met with Code Level 3 or above. There were a further 10 local authorities that indicated they currently had a water-specific requirement. In relation to their future intentions, 15 local authorities indicated that they would wish to have a water-specific standard in the future.

Water technical questions

Question 4.1 - 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

221. The consultation sought views on the performance requirements of the higher standard. There were 120 responses to the general question about whether the proposed standards were pitched at the right level. More than a half of those that responded to this question (62 responses or 52%) said they believed they were about right. This agreement was largely reflected across the different categories of respondent with the exception of builders/developers (where seven of the nine respondents thought proposals went too far) and designers/engineers/surveyors (where 10 of the 17 responses stated proposals did not go far enough). In groups other than builder/developers, there were relatively few that believed the proposals went too far and, in total, only 15 of the 120 responses fell into this category. However, a more significant minority (36%) indicated they felt the proposals did not go far enough.

			Table QA4: Water - Analysis by Sector																	
QA4.1	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
A	15	13%	7	6%	0	0%	1	1%	3	3%	0	0%	2	2%	0	0%	0	0%	1	1%	1	1%
B	62	52%	1	1%	8	7%	2	2%	17	14%	7	6%	7	6%	2	2%	0	0%	0	0%	18	15%
C	43	36%	1	1%	2	2%	1	1%	11	9%	10	8%	4	3%	1	1%	0	0%	1	1%	12	10%
Total	120	100.00%	9	8%	10	8%	4	3%	31	26%	17	14%	13	11%	3	3%	0	0%	2	2%	31	26%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 4.2 - 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).

222. This question sought to understand why respondents had indicated they did not agree that the proposals were pitched at the right level. Most commonly, it was argued that water efficiency should only be addressed through the building regulations and at the current level. One respondent argued this should be the case until we had a better understanding of how the existing provisions were working in practice. A number indicated that tighter water efficiency standards should not be imposed on new homes and should be dealt with more broadly, for example, through compulsory water metering or variable tariffs. It was also argued that as water companies already levy infrastructure charges on new development that that income should be sufficient to ensure sufficient future supply.

223. Of the 43 responses that stated the proposals did not go far enough, there were two mains reasons given – that either the national minimum standard was not tight enough or that the proposed local standard was not. Additional comments in support of these views reflected those already outlined in relation to Questions 42 and 43.

Chapter 5: Energy efficiency

224. Chapter 5 of the consultation document proposed that for energy and carbon standards the preferred option would be a building regulations only approach to delivering Zero Carbon Homes from 2016.

225. Alongside this overall approach, the consultation proposed the removal of other standards in the Code for Sustainable Homes and highlighted that the Planning and Energy Act may need to be amended or removed, whilst retaining the powers in the Act to identify off-site low carbon and renewable energy supply systems.

Question 51 - 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.

226. There were 276 responses to this question. Of those, 63% agreed that the Government should move towards a building regulations only approach and whilst in most sectors this reflected the split between agreement and disagreement, the energy sector respondents were almost unanimously against this proposal by 9 to 1.

227. A proportion of those in favour simply indicated that they thought a building regulations only approach was the right thing to do, to remove complexity and cost from the development industry. There were then a proportion of those in favour who highlighted the importance of the Government's zero carbon policy – especially the importance of clarifying the policy. The majority of developers and local authorities could see the sense in the preferred approach, even if they shared different views on how far regulations should be strengthened as we move towards 2016.

228. Of the 37% of respondents who answered "no", there was some outright opposition to the proposals. This was particularly true of organisations in the renewables or consultancy sectors. These sectors raised the point that they believed Government needed to make a firmer commitment to delivering zero carbon before local standards that drove the policy forward were removed.

229. There were those in this category of responses who could see sense in the preferred approach but still thought that clarity was needed on the Zero Carbon home policy before it could indicate full support. There were those who therefore

argued for an interim standard as a stepping stone towards delivering Zero Carbon Homes through building regulations.

			Table 6: Energy - Analysis by Sector																			
Q51	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
Yes	**175**	**63%**	19	**7%**	17	**6%**	6	2%	46	17%	17	6%	18	7%	1	0%	0	0%	7	3%	43	16%
No	**101**	**37%**	3	**1%**	2	**1%**	1	0%	23	8%	8	3%	11	4%	9	3%	0	0%	2	1%	42	15%
Total	**276**	**100%**	22	**8%**	19	**7%**	7	**3%**	69	**25%**	25	**9%**	29	**11%**	10	**4%**	0	**0%**	9	**3%**	85	**31%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 52 - Are respondents content with the proposal in relation to each energy element of the Code for Sustainable Homes? 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.

230. There were 231 responses to this question. Of those, 63% were content with the Government's proposed approach in relation to the energy elements in the Code. As with the responses to question 51, there was a significant level of support from the development sector and local authorities. The arguments in favour of removal where consistent with the positive responses to question 51 – arguing that building regulations where a better place to deal with carbon and energy standards as we move towards zero carbon homes. Beyond the energy and carbon standards covered by building regulations, there was agreement that other standards had been overtaken by developments - for example the provision of energy efficient white goods was now a European requirement.

231. Of those respondents who answered "no", there was a particularly strong response from the renewables sector and consultants – particularly those consultants who operated as Code for Sustainable Homes assessors. They argued that the majority of Code elements where still relevant and should remain in place to drive innovation at a local level. Some disapproved of the removal of any element of the Code. There were then a proportion who agree with the removal of some elements, but wanted to retain others – in particular drying space and requirements for smart metres.

232. Where respondents want some elements retained, there is no clear direction given on whether they should be retained within building regulations or as an interim standard.

			Table 6: Energy - Analysis by Sector																			
Q52	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	145	63%	15	6%	13	6%	3	1%	40	17%	15	6%	18	8%	2	1%	0	0%	5	2%	34	15%
NO	86	37%	4	2%	2	1%	3	1%	20	9%	9	4%	7	3%	8	3%	0	0%	1	0%	31	13%
Total	231	100%	19	8%	15	6%	6	3%	60	26%	24	10%	25	11%	10	4%	0	0%	6	3%	65	28%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 53 - 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?

233. For all three evidence questions, there was a fairly even split of opinion. There were 53 responses to this question. Of those, 55% agreed with the estimates provided. The majority of local authorities who responded agreed with our estimates, whereas more developers disagreed.

234. Some alternative evidence on costs was provided. Where specific information has been evidenced it will be considered in development of future impact assessments. This is also the case for questions 54 and 55.

			Table 6: Energy - Analysis by Sector																			
Q53	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	29	55%	2	4%	2	4%	0	0%	7	13%	3	6%	3	6%	2	4%	0	0%	1	2%	9	17%
NO	24	45%	5	9%	3	6%	0	0%	2	4%	2	4%	3	6%	1	2%	0	0%	0	0%	8	15%
Total	53	100%	7	13%	5	9%	0	0%	9	17%	5	9%	6	11%	3	6%	0	0%	1	2%	17	32%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 54 - 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?
If you do not agree please provide the evidence to support your alternative figures.

235. There were 61 responses to this question. Again there was a fairly even split of opinion, although in this case more disagreed 56% than agreed 44%. Again, more local authorities agreed, whilst the majority of developers did not.

			Table 6: Energy - Analysis by Sector																			
Q54	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	27	44%	1	2%	3	5%	0	0%	8	13%	3	5%	2	3%	1	2%	0	0%	2	3%	7	11%
NO	34	56%	7	11%	3	5%	0	0%	3	5%	7	11%	5	8%	2	3%	0	0%	0	0%	7	11%
Total	61	100%	8	13%	6	10%	0	0%	11	18%	10	16%	7	11%	3	5%	0	0%	2	3%	14	23%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 55 - 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?
If you do not agree, please provide the evidence to support your alternative figures.

236. There were 43 responses to this question. Of those, 51% agreed with the estimates provided. Again, more local authorities agreed than developers.

Q55	Summary		Table 6: Energy - Analysis by Sector																			
			Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	22	**51%**	1	**2%**	2	**5%**	0	0%	4	9%	3	7%	1	2%	3	7%	0	0%	1	2%	7	16%
NO	21	**49%**	4	**9%**	2	**5%**	0	0%	1	2%	2	5%	2	5%	2	5%	0	0%	0	0%	8	19%
Total	**43**	**100%**	**5**	**12%**	**4**	**9%**	**0**	**0%**	**5**	**12%**	**5**	**12%**	**3**	**7%**	**5**	**12%**	**0**	**0%**	**1**	**2%**	**15**	**35%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 56 - 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.

237. The Government’s position on the Act, as set out in the consultation document, was that it is not intending to remove the ability for local planning authorities to use planning policy to identify locations for, and require connections to, low carbon or renewable energy supply sources. This is an important local decision.

238. The consultation set out the Government’s position that the progressive strengthening of the Building Regulations meant it is no longer appropriate for local plan policies to specify additional standards for how much of the energy use from homes should come from on-site renewables. On this basis the consultation explained the need for the Government to consider the role of the Planning and Energy Act, highlighting that it may need to be amended or removed. It asked for views on this proposal.

239. Views on the proposals to amend or remove the Act were mixed, but weighted more in favour of a review of the powers than against – reflecting the overall support for a Building Regulations only approach under question 51.

240. In particular, developers want to see a review – highlighting the issues of complexity and range of solutions and costs that the Act has brought about. A number of local planning authorities are also in favour of a review, who do not see a role for planning in decisions about the energy performance of houses. There were also a number of views in favour or retention of the Act – particularly from the renewable energy sector, who highlighted the important role the Act has played in driving up energy efficiency and carbon reduction locally and supporting the uptake of renewable energy measures such as solar panels.

Chapter 6: Indoor environmental standards

241. Chapter 6 of the consultation document considered indoor environmental standards in new homes. There were four sections relating to overheating, daylighting, sunlighting and indoor air quality in which the Government set out background considerations and its proposed course of action.

Overheating

242. The Government set out that whilst it recognised that summer overheating was an area of growing concern, work to develop specific solutions is still on-going and many of the necessary solutions relate to the planning matters. The Government view was that it considered that overheating was therefore not an issue that should be addressed by developing a standard as part of the Housing Standards Review and no questions on overheating were included on the consultation response form.

243. The consultation document did present proposed actions on overheating, namely that DCLG will monitor on-going industry research and review existing regulations to establish the scope for amending energy efficiency and ventilation standards; that DCLG/DECC will consider how the SAP methodology for assessing excessive solar gain could be developed; but that industry should lead on the development of analytical tools and guidance on mitigating overheating risks.

244. Comments on overheating were made in responses to the questions on daylighting, sunlighting and indoor air quality. There was general agreement that overheating was an important topic that needed more research and evaluation with many suggesting that the significance of overheating will only increase as we approach zero carbon standards from 2016. There was some disappointment that overheating was not part of the Housing Standards Review. CIBSE Guide TM52 (which deals with design and overheating) was mentioned as an existing overheating standard.

245. Overheating was said to be a particular problem in high density developments and communal heating schemes. It was exacerbated by the urban heat island effect, more airtight homes, and solar heat gains through south-facing windows.

246. Several respondents emphasised the importance of taking an integrated approach to designing for energy efficiency, daylighting, sunlighting and ventilation to achieve a comfortable, quiet, healthy and secure indoor environment. They felt there was a need for greater clarity in the role of building regulations and planning requirements in mitigating overheating risks. Some suggested that building regulations and the planning process should not be separate regulatory regimes.

247. Some felt that the housing shortage meant that there was no incentive for the market to drive up standards, and standards therefore needed to be statutory. Without statutory standards some felt there was also a risk that new homes in the higher cost end of the market would be built with large windows and air conditioning.

Daylighting

248. The consultation set out that daylighting is not directly controlled in the building regulations, but glazed area and orientation are elements of the government's Standard Assessment Procedure (SAP), which is part of the National Calculation Methodology underpinning the energy efficiency requirements in the building regulations. In establishing emission targets for new homes, SAP assumes a notional glazed area of 25% – but this is not a prescriptive requirement and designers can adopt alternative measures in meeting the compliance targets.

249. Government set out in the consultation that it was 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.

Question 57A - Do you believe that new homes are not achieving a sufficient level of daylighting in habitable rooms?
If so what evidence do you have that this is the case (please submit evidence as part of your consultation response)?

250. There were 182 responses to this question. Overall, 52% felt that new homes were not achieving a sufficient level of daylighting, but views differed significantly between the sectors. Of the 14 respondents from the builders/developers sector, 12 felt that daylighting levels were adequate. By contrast, of the 26 respondents from the designers/engineers/surveyors sector, only 6 felt that daylighting levels were adequate.

Q57A	Summary		Table 7: Indoor Environmental Standards - Analysis by Sector																	
			Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	95	52%	2	1%	4	2%	4	2%	14	8%	20	11%	15	8%	4	2%	0	0%	1	1%	30	16%
NO	87	48%	12	7%	9	5%	1	1%	28	15%	6	3%	5	3%	2	1%	0	0%	1	1%	23	13%
Total	182	100%	14	8%	13	7%	5	3%	42	23%	26	14%	20	11%	6	3%	0	0%	2	1%	53	29%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 57B - Do you think that it is desirable to consider having a national daylighting standard for use in the design of new homes?

251. Of the 209 responses to this question, 74% overall supported having a national daylighting standard for new homes. However, 13 of the 17 respondents from the builders/developers sector disagreed.

252. In commenting, some respondents said that minimum standards were essential and the key for a healthy indoor environment given evidence that poor daylighting could affect occupants' health and well-being, leading to rickets, insomnia, depression and other ailments. It was noted that good daylighting also reduced reliance on artificial lighting and that good designers will balance daylighting against heat loss and the risk of overheating. There was some concern that without standards, cost-driven developers may reduce glazing to reduce costs.

253. Others felt that there was no evidence of a problem and that daylight standards for habitable areas based on BRE guidance and the British Standards BS 8206 were well set out in the Code and should not be altered. Some respondents noted that existing local planning policies based on BRE guidelines have operated successfully for many years. Others noted that surveys of occupants of new housing show high levels of satisfaction with daylighting.

254. As noted above, the importance of taking an integrated approach to designing for energy efficiency, daylighting, sunlighting and ventilation was emphasised.

Q57B	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
			Table 7: Indoor Environmental Standards - Analysis by Sector																			
Option	**No.**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**	**No**	**%**
YES	**154**	**74%**	4	**2%**	8	**4%**	4	2%	34	16%	25	12%	24	11%	6	3%	0	0%	2	1%	46	22%
NO	**55**	**26%**	13	**6%**	7	**3%**	2	1%	20	10%	3	1%	2	1%	0	0%	0	0%	0	0%	8	4%
Total	**209**	**100%**	17	**8%**	15	**7%**	6	**3%**	54	**26%**	28	**13%**	26	**12%**	6	**3%**	0	**0%**	2	**1%**	54	**26%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 58 - 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?
If you have any relevant research or evidence please submit this as part of your consultation response

255. The Scottish Building Standards and the London Housing Supplementary Planning Guidance both require glazing to be a fixed, minimum percentage of the floor area of a habitable room (15% and 20% respectively). The consultation suggested this was a simple measurement which could allow designers reasonable flexibility in how they define solutions for daylighting. However, the consultation noted that no account is taken of the likely different orientations of windows, which may give rise to some complexity in designing for solar gain (in south western aspects) or to achieve high levels of energy performance by limiting glazing in north facing windows.

256. There were 170 responses to this question with 69% overall expressing support. Again, the main objection came from the builders/developers sector although this was relatively evenly split: of the 18 respondents, 10 disagreed.

257. Some felt that a simple percentage based standard would encourage more designers to consider daylighting, as current standards based on BRE guidance were complex and discouraged some designers, and also Code standards could be difficult to achieve for high density, high rise developments and often not achieved with changes of use: a minimum window area might then be a sensible backstop.

Q58	Summary		Table 7: Indoor Environmental Standards - Analysis by Sector																			
			Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	118	69%	8	5%	10	6%	5	3%	29	17%	21	12%	13	8%	4	2%	0	0%	1	1%	26	15%
NO	52	31%	10	6%	1	1%	0	0%	15	9%	4	2%	5	3%	2	1%	0	0%	1	1%	14	8%
Total	170	100%	18	11%	11	6%	5	3%	44	26%	25	15%	18	11%	6	4%	0	0%	2	1%	40	24%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Sunlighting

Question 59 - Do you agree that sunlighting should sit outside the scope of this review?

258. The consultation set out that Sunlighting issues in new homes refer to the amount of direct sunlight that enters into habitable rooms or dwellings as a whole. Typically, the amount of sunlight results from the design and orientation of a home combined with its surrounding context. Sunlighting is a different issue from day lighting and poses different risks to health and wellbeing.

259. Based on the views of the working group, the consultation set out government's view that ensuring adequate sunlight is primarily a strategic and site planning matter, rather than a matter grounded in the internal layout of a property and sought people's views on this being the case.

260. There were 217 responses to this question. Of those, 69% agreed that sunlighting should be considered outside the scope of the review. Some suggested that Planning is a better place for it. Others felt that the current daylight standards and Right to Light Act are more appropriate to determine the daylight levels in habitable spaces. It was stressed that any standards shouldn't conflict with daylighting or energy requirements.

261. The remaining 31% of responses disagreed, mainly on the basis that direct sunlight is a contributing factor to overheating, and therefore daylighting, sunlight and ventilation are all intertwined and must be considered as a whole.

262. Of those who answered ‘yes’ in their responses to the question on sunlighting (149), the majority were local authorities (58) and builders/developers (21).

			Table 7: Indoor Environmental Standards - Analysis by Sector																			
Q59	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	**149**	**69%**	19	**9%**	12	**6%**	3	1%	47	22%	16	7%	13	6%	0	0%	0	0%	3	1%	36	17%
NO	**68**	**31%**	2	**1%**	4	**2%**	3	1%	11	5%	11	5%	10	5%	6	3%	0	0%	0	0%	20	9%
Total	**217**	**100%**	21	**10%**	16	**7%**	6	**3%**	58	**27%**	27	**12%**	23	**11%**	6	**3%**	0	**0%**	3	**1%**	56	**26%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Indoor Air Quality

Question 60 - Do you agree that essential indoor air quality issues should be addressed through on-going review of Part F (Ventilation) of the Building Regulations?

263. The proposal in the consultation was that DCLG should continue to review indoor air quality parameters (including World Health Organisation, European, Department of Health and HSE guidelines) and ventilation provisions in the building regulations to ensure that performance criteria and guidance in these areas remained effective and fit for purpose. The Government did not propose to develop any specific additional ventilation standards as part of the Housing Standards Review process.

264. Of 242 respondents to the question, 230 (95%) agreed that there should be an on-going review of Part F standards and guidance. Respondents felt that adequate ventilation was important for controlling indoor air quality – levels of moisture and other pollutants – and that the review should cover both natural and mechanical ventilation systems. Some respondents had seen an increase in damp and condensation problems in newly developed housing, and felt that ventilation standards needed to be higher. There were suggestions that the standards should cover emissions from building materials and products; take account of energy efficiency, overheating, security and noise issues (including at the planning stage); and address commissioning, performance and

maintainability of mechanical ventilation systems, now increasingly being installed in new homes to meet energy efficiency standards.

			Table 7: Indoor Environmental Standards - Analysis by Sector																	
Q60	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	230	95%	20	8%	19	8%	7	3%	57	24%	26	11%	29	12%	8	3%	1	0%	5	2%	57	24%
NO	12	5%	1	0%	0	0%	0	0%	0	0%	0	0%	0	0%	1	0%	0	0%	0	0%	10	4%
Total	242	100%	21	9%	19	8%	7	3%	57	24%	26	11%	29	12%	9	4%	1	0%	5	2%	67	28%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Chapter 7: Materials

265. Chapter 7 of the consultation considered material standards for new homes. The consultation set out the Government's belief that materials standards should not form part of any set of Nationally Described Standards. Instead the consultation suggested that standards might be better led by the market (as is already the case for most development in the private sector).

Question 61 - Do you agree that materials standards are best left to the market to lead on?

266. There were 250 responses to this question with an even split between those who favour the approach suggested and those that oppose it. However, within that, views differed between different sectors. For example, 17 of 22 responses from builders/developers, 13 out of 17 from property management and 32 out of 56 local authorities supported the proposed approach. Conversely, 18 out of 27 specific interest groups and 17 out of 25 designers, engineers and surveyors did not support the approach.

267. Of the 50% of respondents that supported the proposals, only a minority actually provided comments and these covered a number of themes. Most commonly, respondents conditioned their support by making clear that they believed that issues such as the appearance of materials should still properly continue to be a matter for the planning system. Similarly, a number also generally supported the approach, but indicated that planning should still encourage better sustainability and local sourcing. A number of respondents cited the complexity of properly assessing the sustainability of materials as a fundamental reason to oppose locally-imposed standards. Others mentioned the risk that local standards might be overly prescriptive or stifle innovation. Finally, a number said that while they would not favour local standards being imposed, there would be merit in a national standard (perhaps set through the building regulations and/or based on MAT 1 and 2 in the Code for Sustainable Homes).

268. Of the half of respondents that did not agree with the approach proposed in the consultation, the vast majority commented. Around a third of these responses expressed concern that the market would fail to consider the sustainability of the materials used in new homes without such standards being imposed. Instead developers would likely focus primarily on the lowest cost building solution in the absence of an incentive/requirement to do otherwise. Some respondents suggested this was because customers were not well informed enough. Two

others stated that the market would not properly consider the possible externalities associated with the choice of materials.

269. It was also argued that an additional consequence of leaving material standards to the market would be a drag on innovation, potentially creating stagnation and a reduction in the investment that the Code for Sustainable Homes and existing planning approach had encouraged. There were also suggestions that materials standards were necessary to address issues of volatile organic compounds and air quality in increasingly air tight homes.

270. Again some of the same points that were made by those that indicated they supported the proposed approach were made by those opposed. In particular, it was explicitly argued by around 10% of those that commented that a materials standard was needed either in the building regulations or in a Nationally Described Standard. It was also suggested that planning should still be able to deal with how materials affect the aesthetics of a building or to ensure materials are responsibly or locally sourced.

271. Some concern was expressed that a materials-specific working group had not been formed as part of the review with a number suggesting one should be established now to determine what a materials standard should consist of in the future.

			Table 8: Materials responses - Analysis by Sector																			
Q61	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
YES	**125**	**50%**	17	**7%**	13	**5%**	6	2%	32	13%	8	3%	9	4%	4	2%	0	0%	5	2%	31	12%
NO	**125**	**50%**	5	**2%**	4	**2%**	2	1%	24	10%	17	7%	18	7%	5	2%	0	0%	5	2%	44	18%
Total	**250**	**100%**	22	**9%**	17	**7%**	8	**3%**	56	**22%**	25	**10%**	27	**11%**	9	**4%**	0	**0%**	10	**4%**	75	**30%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Chapter 8: Process and compliance

272. Chapter 8 of the consultation built on options set out in the introduction. It considered how the outcomes of the Housing Standards Review could best be implemented to reduce the complexity and cost of compliance and assessment. It suggested that any emerging standards should ideally be assessed by or through building control bodies, and that this could be achieved through either nationally described housing standards or regulated options. These are set out below:

- **Option A -** a nationally described standards set which would operate in addition to the building regulations
- **Option B -** integrating the standards into building regulations straightaway without an intermediate step
- **Option C** - a hybrid of options A and B developing the nationally described standards as a stepping stone en route to integrating the standards into building regulations at a future date

273. The Chapter looked at the options for improving the ways in which local planning and building control processes could work better together, and how any eventual standards document emerging from the review could be owned or hosted. It also sought views on the likely benefits of taking forward the proposed simplification process.

Question 62 - Which of the above options do you prefer (1, 2, or the hybrid approach)? Please provide reasons for your answer.

274. There were 215 responses to this question and the majority supported the Hybrid option and option 2. Support was fairly evenly split between the two – 46% and 40% respectively. This was broadly reflected among the different sectors particularly among builders/developer and Local authorities. Several homebuilders were opposed to having a tiered approach within Option 2 under which regulated options would be applicable if a particular local need could be identified and justified. Those who supported the Hybrid option were recognising the time it could take to introduce regulations.

275. Some of the 14% who supported Option 1 felt that it offered flexibility that would help to meet local needs. Some respondents also felt that this option offered an opportunity to fully review current housing standards.

Q62	Summary		Table 9: Process and Compliance responses - Analysis by Sector																			
			Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%	No	%
1	30	14%	2	1%	1	0%	1	0%	9	4%	5	2%	0	0%	2	1%	1	0%	0	0%	9	4%
2	86	40%	11	5%	3	1%	1	0%	27	13%	5	2%	12	6%	2	1%	0	0%	3	1%	22	10%
HYBRID	99	46%	4	2%	9	4%	5	2%	17	8%	11	5%	14	7%	5	2%	0	0%	2	1%	32	15%
Total	215	100.00%	17	8%	13	6%	7	3%	53	25%	21	10%	26	12%	9	4%	1	0%	5	2%	63	29%

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 63 - 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.

276. There were 201 responses to this question and the majority, 77%, agreed with the proposition. This was reflected across all the sectors but particularly amongst builders / developers (16 of 19), Local authorities (32 of 35) and Specific interest groups (22 of 26).

277. Some of the suggested benefits of having a nationally consistent set of housing standards included increased certainty, optimised innovation, economies of scale, a level playing field and a reduction in design consultancy fees. No estimates or evidence were provided to support these assertions. There were questions about how significant the savings could be and who the potential beneficiaries might be. Some respondents suggested that the large homebuilders would gain the most. There were some concerns about the potential impact on sustainability and suggestions from some homebuilders that there should be no additional tiers for local application.

278. Among the 23% who disagreed with the proposition, some respondents felt that the existing Code for Sustainable Homes was sufficient as it was already widely recognised and understood by the industry and was delivering supply chain efficiencies.

Q63	Summary		Table 9: Process and Compliance responses - Analysis by Sector Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacturer / Supply Chain		Other	
Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
YES	**155**	**77%**	16	**8%**	12	**6%**	4	2%	32	16%	14	7%	22	11%	3	1%	1	0%	5	2%	45	22%
NO	**46**	**23%**	3	**1%**	1	**0%**	1	0%	3	1%	5	2%	4	2%	4	2%	0	0%	0	0%	25	12%
Total	**201**	**100.00%**	19	**9%**	13	**6%**	5	**2%**	35	**17%**	19	**9%**	26	**13%**	7	**3%**	1	**0%**	5	**2%**	70	**35%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option

Question 64 - 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?

279. There were 208 responses to this question and the majority, 72%, agreed with the proposition. This was again reflected in the sector responses particularly amongst Local authorities (29 of 32). Within the ‘Other’ category, there were a number of responses from members of the Metropolitan Police who broadly agreed that there would be cost reductions but expressed concern about the security proposals.

280. Other respondents provided a broad range of reasons for possible cost reductions. These included expectations that designers and builders would develop an understanding of requirements more quickly and avoid delay and costs to the developers and local authorities at the plan making stage; greater precision in supply-ordering by developers saving over-ordering or unnecessary costs; a reduction in consultants' fees, less risk in delivery, clarity of expectations, elimination of the need to design bespoke responses to local variations, more confident suppliers gearing up for long production runs and so producing efficiencies, and less ambiguity regarding required compliance levels.

281. No estimates or evidence were provided and a couple of respondents said that the extent of abortive work due to compliance with various conflicting standards was difficult to assess, and that it was very difficult to pinpoint figures as records of these costs were not kept in great detail by most homebuilders.

282. Of the 28% who disagreed with the proposals, some believed that the standards would actually increase costs due to issues around, transition, retraining, delays, developers re-submitting planning applications to obtain less onerous requirements etc. A number also felt that the existing Code for Sustainable Homes was already achieving these cost reductions.

			Table 9: Process and Compliance responses - Analysis by Sector																	
Q64	Summary		Builders / Developers		Property Management		Building Occupier		Local Authorities		Designers / Engineers / Surveyors		Specific Interest		Energy Sector		Fire and Rescue Authority		Manufacture r / Supply Chain		Other	
Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
YES	**149**	**72%**	12	**6%**	13	**6%**	5	2%	29	14%	13	6%	19	9%	5	2%	1	0%	4	2%	47	23%
NO	**59**	**28%**	8	**4%**	1	**0%**	1	0%	3	1%	6	3%	7	3%	3	1%	0	0%	1	0%	29	14%
Total	**208**	**100.00%**	20	**10%**	14	**7%**	6	**3%**	32	**15%**	19	**9%**	26	**13%**	8	**4%**	1	**0%**	5	**2%**	76	**37%**

The percentage figures for each sector are a portion of the total number of respondents who selected each option