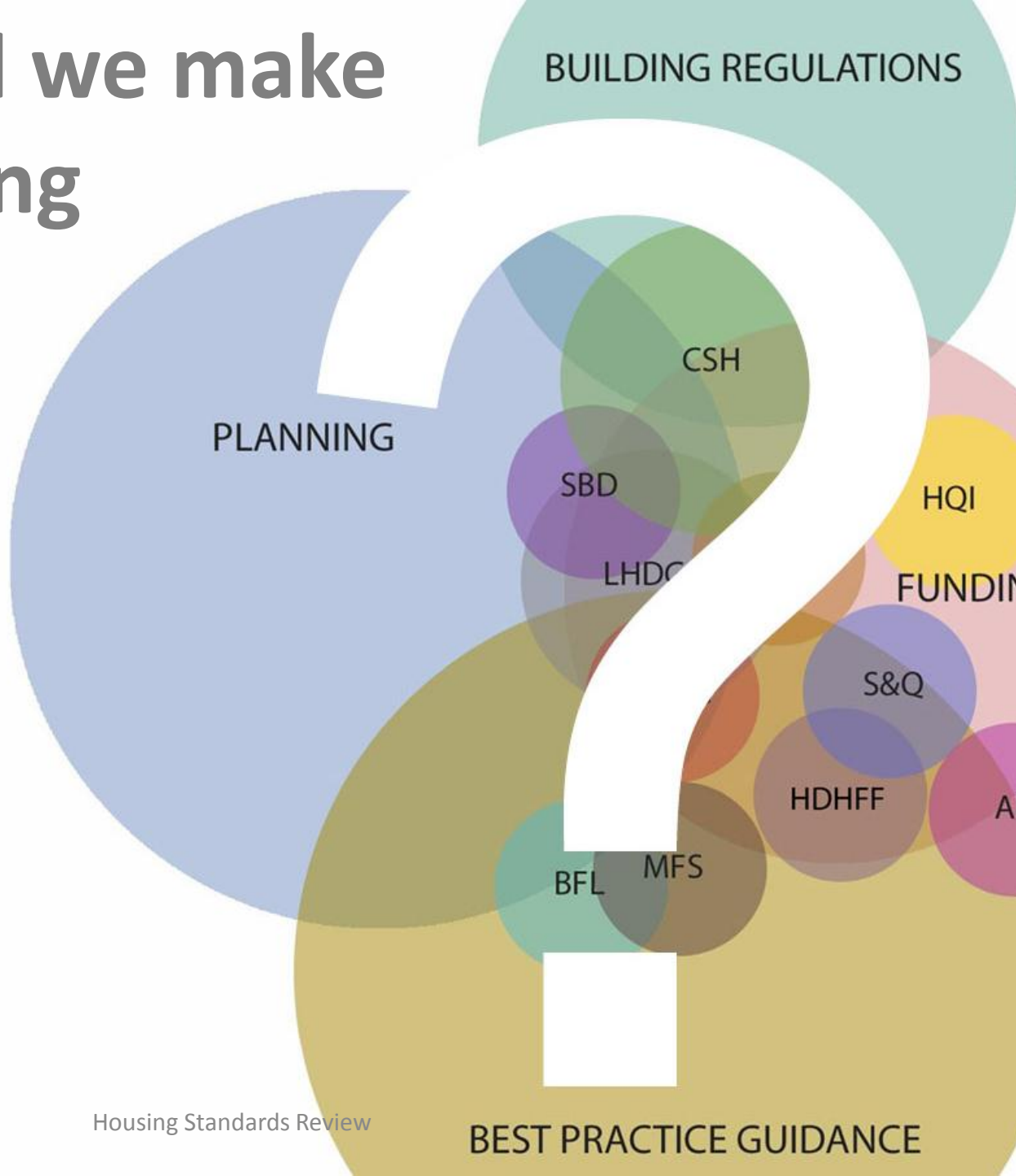


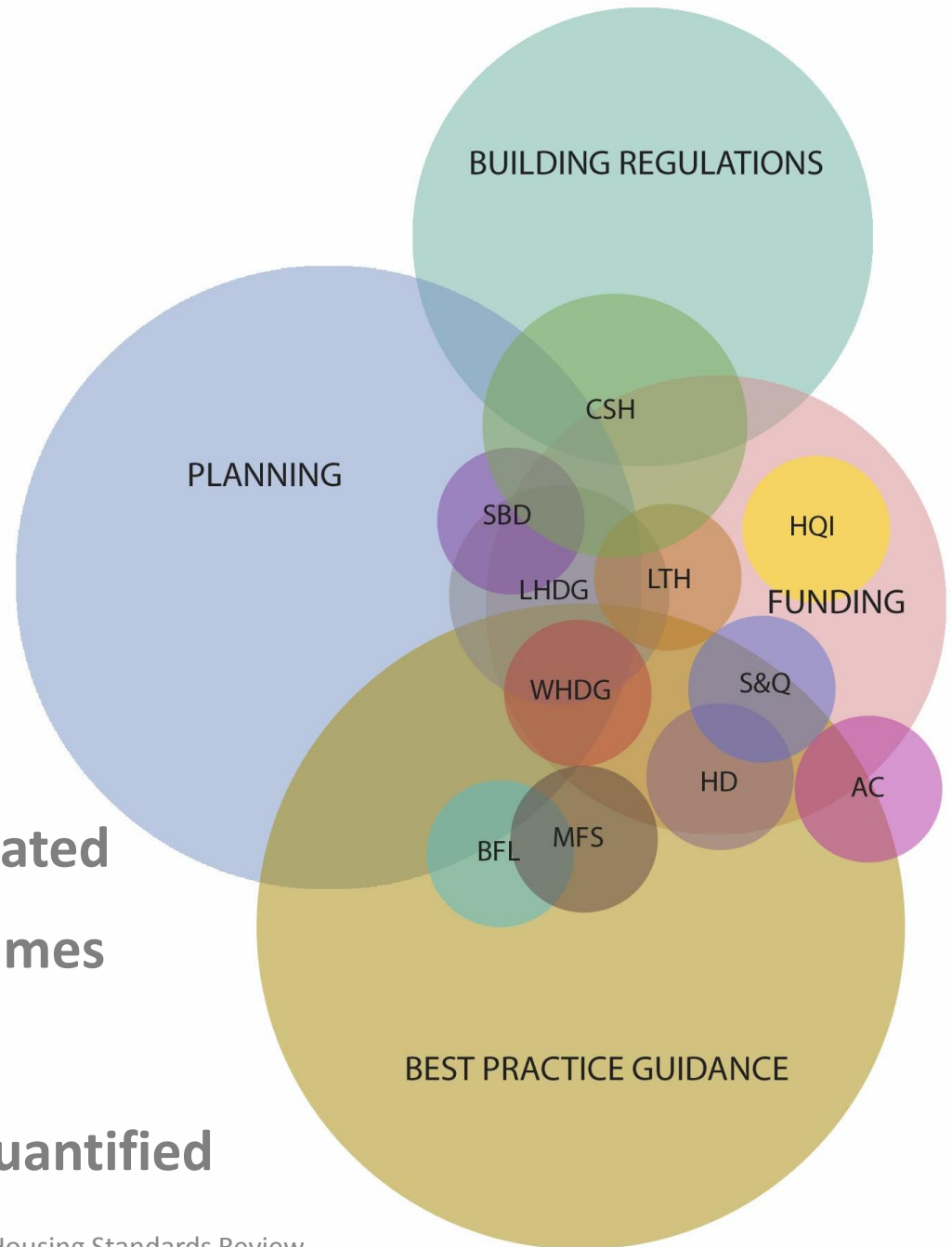
# What should we make of the Housing Standards Review

Julia Park  
Levitt Bernstein



# the problem

- too much
- all in different places
- confusing and uncoordinated
- multiple assessment regimes
- different local versions
- cumulative impact not quantified



# the objectives

- **rationalise** and **streamline** the mass of housing standards typically applied through the planning system
- **save time and cost** across industry and throughout the supply chain
- **boost house-building**
- **maintain quality**

Intended that in the selected subject areas ‘only those standards that remain at the end of the review could be imposed by Local Authorities’ - reinforced by a Ministerial Policy Statement, backed up by legislation if necessary

# how it started

- 2010/11 - began under Grant Shapps as the **'Local Housing Standards Framework'** - but rejected by industry
- 2011/12 - taken on by NHBC chaired **'Local Housing Standards Delivery Group'** led by Sir John Harman - some progress but difficult to square Localism and streamlining, existing standards holders not involved - and they couldn't face space!
- 2012/13 - handed back to Government to chair and manage - re-named the **Housing Standards Review**; became part of the **Red Tape Challenge** so subject to **'One In, Two Out' (OITO)** and all part of the **deregulatory agenda**

# key points about the process

- involved over **140 stakeholders** from across industry
- 4 man independent **Challenge Panel** operated in parallel
- cost advice provided by **E C Harris**
- restricted to **technical issues only** - Taylor review of planning guidance took place in parallel
- adopted a **thematic approach** - eventually limited to:  
**ENERGY**    **WATER**    **SECURITY**    **ACCESSIBILITY**    **SPACE**
- assumption that **all tenures to be treated the same** confirmed in consultation - affordable housing not seen as a special case

# the scope of the review

## **within scope -**

technical aspects of housing standards applied through planning and/or funding such as:

- **Lifetime Homes & Wheelchair Housing Design Guide - Habinteg**
- **Secured by Design - ACPO**
- **Housing Quality Indicators - HCA**
- **Code for Sustainable Homes - DCLG + BRE**
- **London Housing Design Guide - GLA**

## **not within scope -**

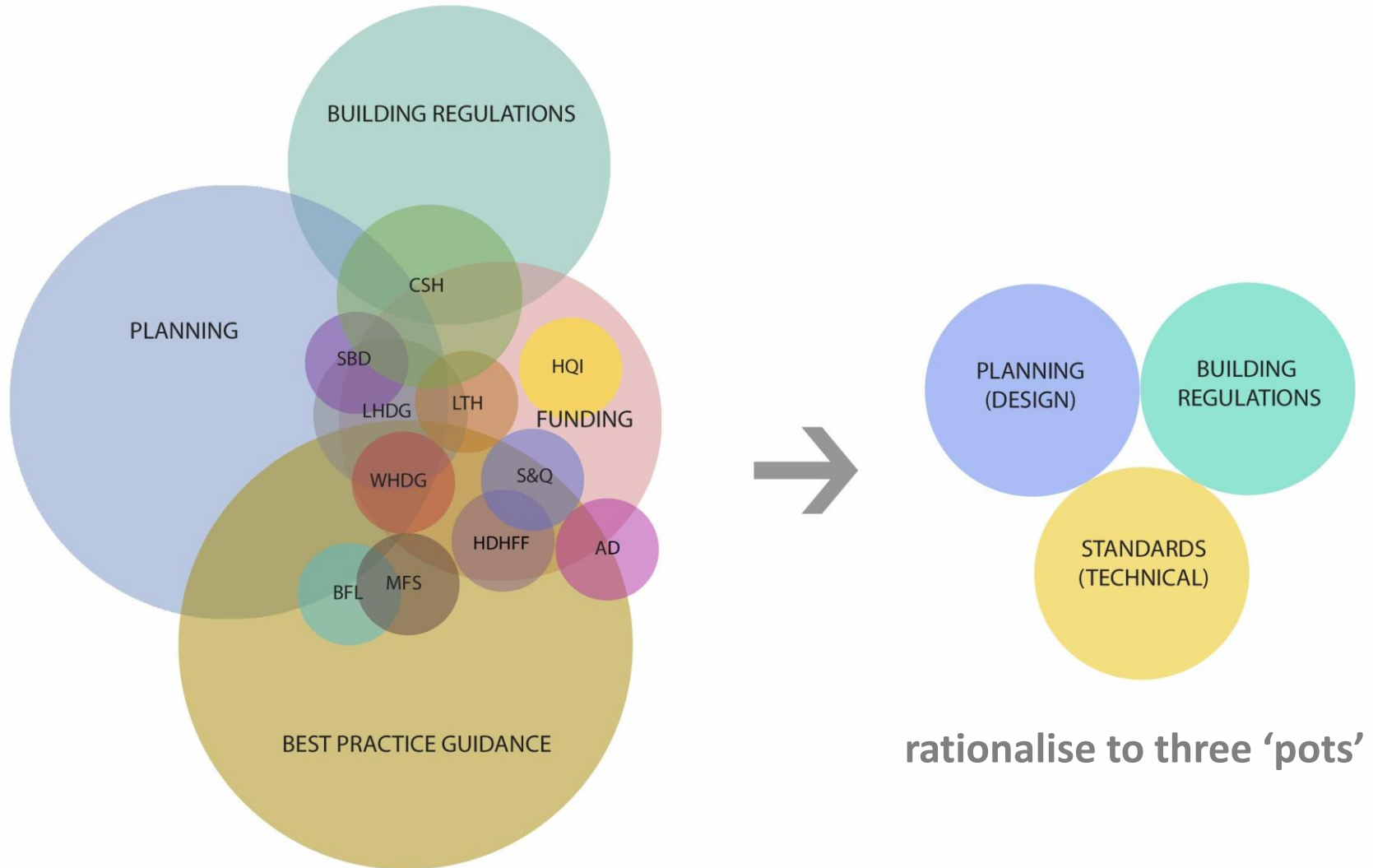
other established regimes, such as:

- **other parts of Building Regulations - DCLG**
- **British Standards - BSI**

and,

- **non-technical national and local planning policy issues**

# the initial proposition

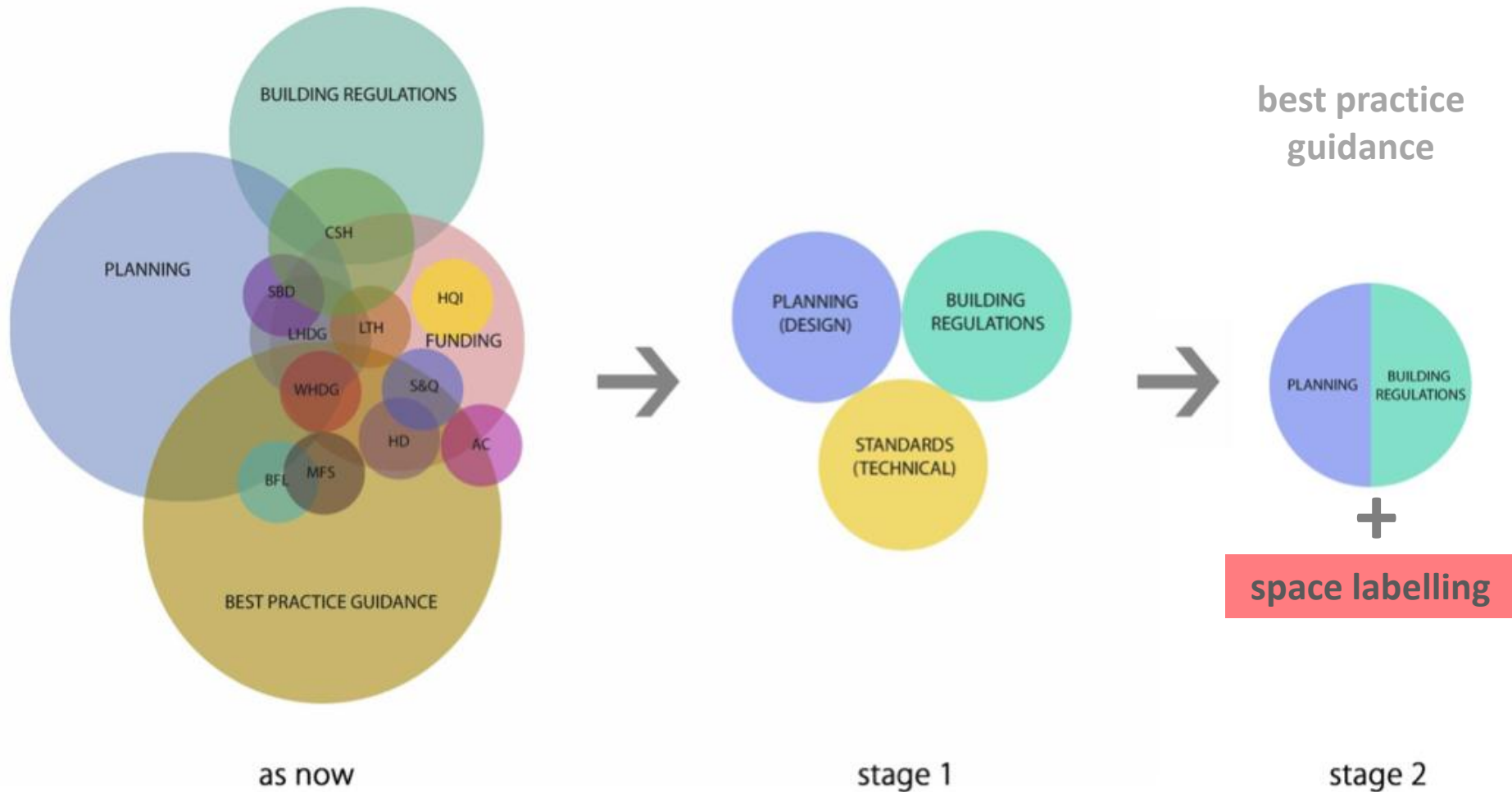


# possible outcomes - all tenures

- A NATIONAL HOUSING STANDARDS + BUILDING REGULATIONS**  
standards for some or all themes formalised into new set of National Housing Standards (multi-level) which LAs can choose to adopt and remain separate from Building Regulations
  - B NATIONAL HOUSING STANDARDS EN-ROUTE TO BUILDING REGS**
  - C STANDARDS TAKEN INTO BUILDING REGS NOW**  
standards for some or all themes taken straight into Building Regulations with '**regulated options**' (baseline and enhanced standards) for local use where appropriate
- Any option could also include **SPACE LABELLING AND/OR BENCHMARKING** (with or without space standards) -
- OR the proposals may be rejected i.e. **NO CHANGE**, business as usual



# OPTION B: Government's preferred 2 stages



# key considerations

- only **regulations can be mandated, standards have to be 'opt-in'** i.e. offered to Local Authorities take up if they choose to and can prove need and viability
- as **OITO only applies to regulation**, standards first is easier and more likely to work (also allows cost savings from process to 'count')
- **regulation would take years; standards months**
- either way, **targets would be set through planning but assessment carried out by Building Control** and could be **multi-level**
- **Building Regulations need an overhaul** - could be much shorter and simpler with a separate set of housing regulations
- but standards (as distinct from regulation) would leave **affordable housing without baseline protection** in Space and Security

# the propositions for each theme

## ACCESSIBILITY

- New 3 tier standard (or regulated options) linked or tied to Space
- Part M modified to become mandatory Level 1 baseline
- Lifetime Homes modified as 'opt-in' Level 2 for a % of homes – step free access required
- Wheelchair Housing modified as 'opt-in' Level 3 for a % of homes

## SPACE

- Space labeling for new homes at point of sale (could be extended to benchmarking)
- Possible new 3 tier space standard linked or tied to **Accessibility** (Level 2 equivalent to GLA standards) but not backed by Govt.
- Regulation not on offer

## Do we agree?

*YES, this is the best/most cost effective way to address the housing needs of an ageing and diverse population*

*NO, labeling and benchmarking are useful, but not enough - we want at least standards, preferably regulation*

# the propositions for each theme

## ENERGY

- Part L update and confirmation of Zero Carbon by 2016 –
- No other standard proposed
- Probable ‘ban’ on The Merton Rule

*Do we agree?*

*YES, but we want Allowable Solutions and Zero Carbon defined now to give time to gear up*

## WATER

- Retain current Part G (125l/pp/day) +
- Higher ‘opt-in’ standard of 110l/pp/day (or equivalent from fittings) in water stressed areas
- No requirement for grey water recycling

*YES, but the target could have been tougher and lifestyle choices matter more – why not extend compulsory water metering to existing homes?*

# the propositions for each theme

## SECURITY

- **new 2 tier standard (or regulated options)**
- **Level 1 equivalent to NHBC (PAS 23 or current industry practice)**
- **Level 2 equivalent to SBD Part 2 (PAS 240)**
- **Government probably prepared to regulate in time**

## DAYLIGHT, SUNLIGHT, OVERHEATING, AIR QUALITY AND MATERIALS

- **no technical standards proposed**

*Do we agree?*

*NOT SURE, we'd probably prefer a single standard set at the higher level for flats at least*

*NOT REALLY, we need to maintain pressure especially for daylight & overheating*

# the 2 stage approach in detail

## Government's preferred short term approach

	current Building Regs	new, locally selected, nationally described standards			industry led labelling at point of sale
	universal	Level 1	Level 2	Level 3	
accessibility					
space					
security					
water					
energy		no standards but publish details of what 'zero carbon by 2016' means			
daylight	no regulation or technical standards proposed				
overheating	no regulation or technical standards proposed				
materials	no regulation or technical standards proposed				

## Government's preferred long-term outcome

	standards moved to Building Regs: mandatory baseline + regulated options			industry led labelling at point of sale
	Level 1	Level 2	Level 3	
accessibility				
space				
security				
water				
energy				

# space labelling and benchmarking

## BENCHMARKING SPACE IN THE HOME

Example: First family home purchase  
38 St Matthews Road, Brixton



### About this home

- 93m<sup>2</sup> five-room house
  - two storeys
  - end of terrace
- Sale Price: £319,000  
Cost per sq m: £3,415  
Cost per sq ft: £317  
Est service charge: N/A

The designed full occupancy of this home is [5] people  
The overall size of this home meets the benchmark for occupancy by [4] people

	Overall area of this home		BENCHMARK AREA		DOES THIS HOME MEET THE BENCHMARK FOR ITS DESIGNED OCCUPANCY?
	m <sup>2</sup>	ft <sup>2</sup>	m <sup>2</sup>	ft <sup>2</sup>	
Overall area of this home	93.5	1005	97	1044	
Celling height	2.5	8.5			
Living room	15	168			
Kitchen/dining/living	29.5	329.5	27.5	296	YES
Total storage	3	34	2.25	24	YES
Bedroom 1	13	141	11.5	124	YES
Bedroom 2	11	118	11.5	124	NO
Bedroom 3	7	75	7.5	81	NO
Rear garden	49	527.5			
Front garden	10	107.5			
External storage	3	32			

The benchmark rating of this home is ★★

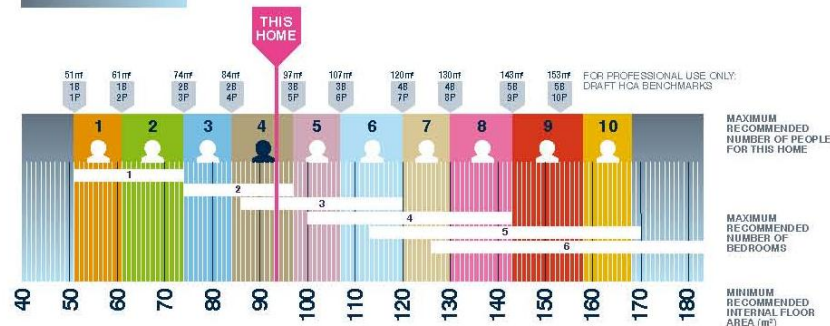


Ground Floor

First Floor



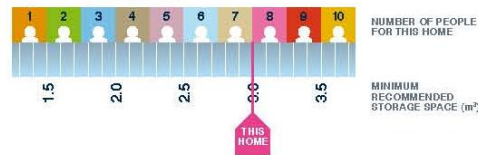
### THE SIZE OF THIS 2-STORY HOME



### THE SIZE OF THE LIVING AREA

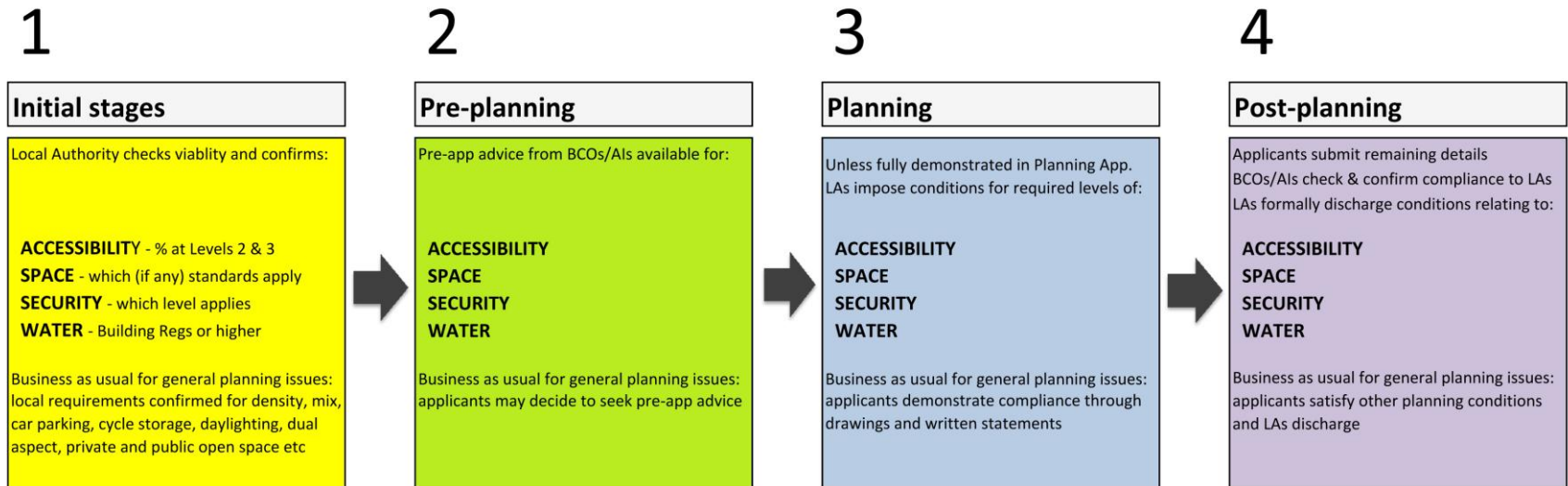


### THE SIZE OF THE BUILT-IN STORAGE CUPBOARDS



# implications for 'process & compliance'

## Implications at 4 stages of the development process



- 1 Standards on the planning portal; LAs define requirements (set Level or % needed for each theme in Local plans or site by site)**
- 2 BCO's & AI's available earlier (pre-app advice and negotiation)**
- 3 Applicants commit to required performance levels at planning**
- 4 Technical details submitted under Building Control - compliance certified to planners and conditions discharged**

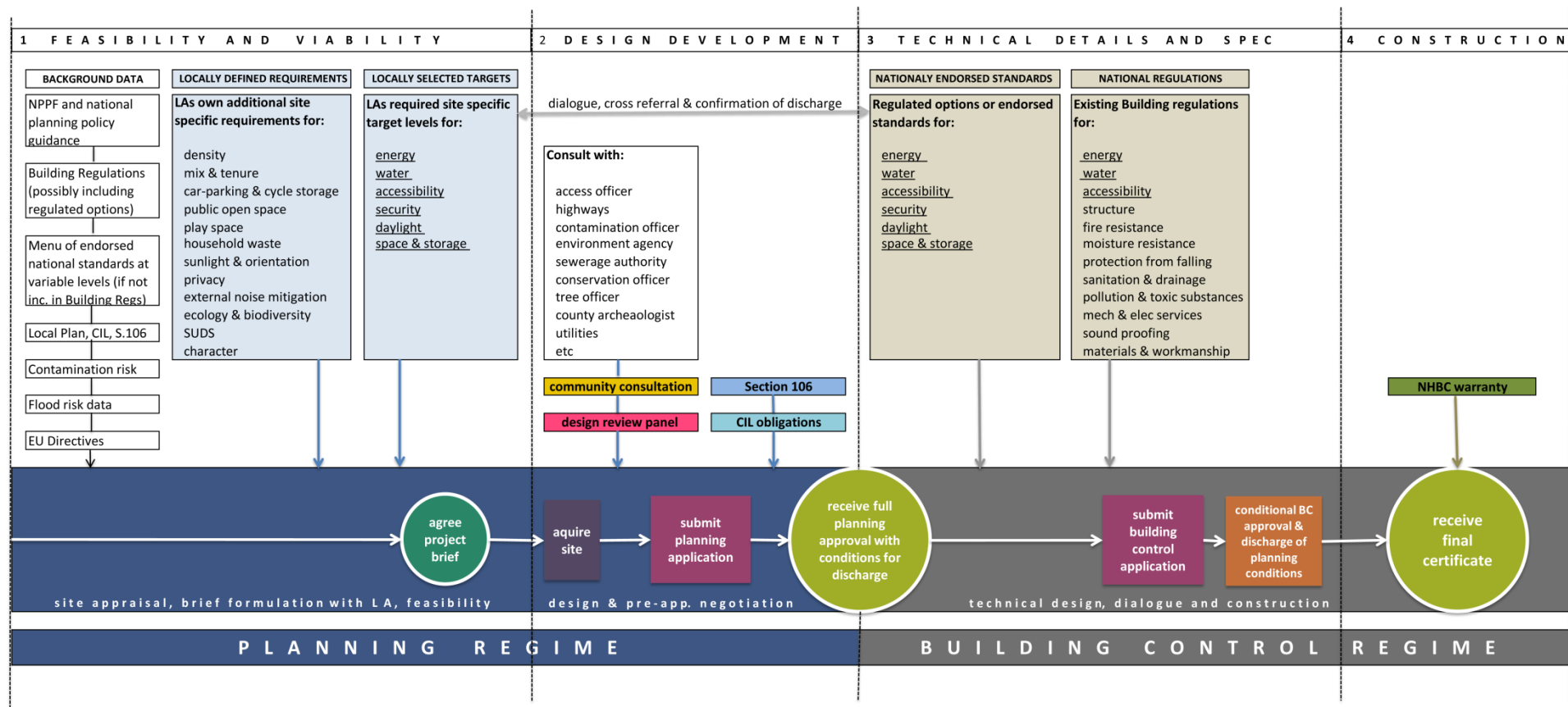


# simpler planning applications

## KEY INFORMATION REQUIRED AT PLANNING APPLICATION STAGE FOR EACH NEW DWELLING

PLOT NUMBER	DWELLING TENURE, TYPE AND SIZE								ACCESSIBILITY LEVEL										INTERNAL SPACE LEVEL		SECURITY LEVEL		WATER EFFICIENCY LEVEL		OTHER	
	MARKET SALE	INTERMEDIATE	PRIVATE RENT	AFFORDABLE RENT	NUMBER OF STOREYS	NUMBER OF BEDROOMS	NUMBER OF BEDSPACES	GIA (M2)	1	2	3	1	2	3	1	2	1	2	ALLOCATED PARKING	CYCLE STORAGE SPACES						
1	✓				1	1	2	48		✓			✓				✓				1					
2	✓				1	1	2	48		✓			✓				✓				1					
3	✓				1	2	3	62	✓			✓					✓				1					
4		✓			1	2	3	62	✓			✓					✓				1					
5		✓			1	2	3	62	✓			✓					✓				1					
6	✓				3	3	5	104	✓			✓					✓				2					
7	✓				3	3	5	104	✓			✓					✓				2					
8	✓				3	3	5	104	✓			✓					✓				2					
9				✓	2	3	6	125		✓			✓				✓				2					
10				✓	2	3	6	125		✓			✓				✓				2					
11				✓	2	2	4	95			✓			✓			✓			1	2					
12	✓				2	2	3	83			✓		✓				✓			1	2					
<b>TOTALS</b>	<b>12</b>	<b>7</b>	<b>2</b>	<b>0</b>	<b>3</b>				<b>6</b>	<b>4</b>	<b>2</b>	<b>6</b>	<b>4</b>	<b>2</b>	<b>0</b>	<b>12</b>	<b>0</b>	<b>12</b>	<b>2</b>	<b>19</b>						

# a more linear process



# things we should be concerned about

## Affordable housing is very vulnerable

**Government wants all tenures to be treated the same, so probably no future for HQIs, all higher standards would be subject to viability and space not regulated**

*should higher levels of Accessibility be exempt from viability testing?  
should more funding be provided where higher levels are invoked?*

## Implications for London Standards

**Key GLA standards are included as Level 2, but likely to mean considerable re-working of LHDG and Housing SPG and some impact on London Plan. Key issues potentially shift from planning to Building Regulations**

*is London unique in these subject areas?*

*would National Standards that exclude London make any sense?*

# how to respond to the consultation

- **read it all through carefully** - including the impact assessment
- **download the response form**
- **answer the formal questions** but state where your response is conditional
- **explain your preferences** clearly whether or not they are on offer
- **don't worry** too much about the detail
- Levitt Bernstein's **Easi-guide to the Housing Standards Review** and the **Challenge Panel Report** might help

reply by 22<sup>nd</sup> October to: [Simon.Brown@communities.gsi.gov.uk](mailto:Simon.Brown@communities.gsi.gov.uk)