



**THE FEDERATION OF BATH
RESIDENTS' ASSOCIATIONS**

Response to the Consultation

on the

Housing Standards Review

Consultation questions

i) Your details: Name: Mr Robin Kerr
Secretary
Federation of Bath Residents' Associations
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ii) Are the views expressed on this consultation an official response from the organisation you represent or your own personal views?

Organisational response

YES

Personal views

iii) Please tick the box which best describes you or your organisation:

District Council

Metropolitan district council

London borough council

Unitary authority

County council/county borough council

Parish/community council

Non-Departmental Public Body

Planner

Professional trade association

Land owner

Private developer/house builder

Developer association

Residents association

YES

Voluntary sector/charity

The Federation of Bath Residents' Associations (FoBRA) brings together 27 Residents' Associations across the city of Bath, representing about 5000 citizens, together with four affiliates, including the Student Unions of both universities and the Guest Houses Association. This response has been prepared after seeking the views of its members. FoBRA is a member of NORA, the National Organization.

iv) What is your main area of expertise or interest in this work?

Chief Executive

Planner

Developer

Surveyor

Member of professional or trade association

Councillor

Planning policy/implementation

YES

Environmental protection

YES

Other (please comment):

Would you be happy for us to contact you again in relation to this questionnaire?

YES

Introduction

This consultation paper deals with several technical issues regarding the design and implementation of Housing Standards, many being more relevant to the house-building industry than potential house owners. The sixty-four questions cover a wide range of problems, which cannot be answered by home-owners. Our members are mostly home-owners though there is a substantial minority who are tenants seeking one day to purchase their homes. They all have clear views whether the dwelling they occupy meets their needs, and it is this aspect that has led to the answers to those questions that relate to residents.

The most serious housing problems facing UK citizens are first the unfortunate level of house price inflation - a consequence of past cheap finance - and secondly the failure to provide affordable rented accommodation for those unable to become home-owners. The profit that developers expect from the building of dwellings is of the order of 20%, so with the high price of land for development it is not surprising that on the one hand dwellings have become smaller and on the other rented properties are not popular because the developer's capital is then tied up in the property.

To ensure that new dwellings including new-build and property conversions are adequate, it is essential that housing standards are suitably appropriate to meet the needs if not the demands of the public. In particular, there must be sufficient space (particularly in starter homes) for modern day living.

21 October 2013

Chapter on Process

Q1 Which of the options (A, B, or C) set out above do you prefer? Please provide reasons for your answers.

FoBRA prefers Option C

Q2 Do you agree that there should be a group to keep the nationally described standards under review? Y/N.

Yes.

It is wiser to have a responsible team available to make changes quickly when needed.

Q3 Do you agree that the proposed standards available for housing should not differ between affordable and private sector housing? Y/N.. Please provide reasons for your answer.

Yes.

It would be invidious and discriminatory to have a lower standard for ‘affordable housing’, which would include rented accommodation; but it would also be shaming and most undesirable for market housing to be built with less space than that in social housing (which happens in some LPAs, including B&NES, where there are not mandatory space standards).

Q4 We would welcome feedback on the estimates we have used in the impact assessment to derive the total number of homes incorporating each standard, for both the “do nothing” and “option 2” alternatives. We would welcome any evidence, or reasons for any suggested changes, so these can be incorporated into the final impact assessment.

No comment

Chapter on Access

Q5 Do you agree that minimum requirements for accessibility should be maintained in Building Regulations? Y/N.

Yes

Q6 a) Is up-front investment in accessibility the most appropriate way to address housing needs, Y/N.

if Yes,

b) Should requirements for higher levels of accessibility be set in proportion to local need through local planning policy? Y/N

Yes to both questions.

Conversions of upper floors cannot always comply with accessibility needs regardless of public demands.

Q7 Do you agree in principle with the working group’s proposal to develop development of a national set of accessibility standard consisting of a national regulatory baseline, and optional higher standards consisting of an intermediate and wheelchair accessible standard? Y/N.

Yes

Q8, 9, 10 & 11 These questions deal with costings and FoBRA members are not competent to answer them..

No comment.

Q12 To what extent would you support integration of all three levels of the working group’s proposed access standard in to Building regulations with higher levels being ‘regulated options’? Please provide reasons for your answer if possible.

a) Fully support. b) Neither support or oppose. c) Oppose.

Fully support – since this is more efficient.

Chapter on Space

Q13 Would you support government working with industry to promote space labelling of new homes?

Yes, provided it is allied to minimum space standards.

It is extraordinary that a simple matter of including the net floor space of a dwelling in the prospectus of a dwelling for sale or for renting is not mandatory. It is rarely included in planning applications unless the Local Planning Authority insists on its inclusion. Architects all use computer driven programs for design and always know the square metrage of the dwellings proposed. It surely should be mandatory both in planning applications and in advertisements. The inclusion of the square metrage of properties for sale and for rent in continental EU is almost universal, and it is a key element in decisions taken by prospective residents. FoBRA members see no reason for it not to be mandatory in England & Wales now.

Q14 Do you agree with this suggested simple approach to space labelling? Y/N.

Yes, but not on its own.

Q15 If not, what alternative approach would you propose?

No answer

Q16 Would you support requirements for space labelling as an alternative to imposing space standards on new development? Y/N

No.

FoBRA members see no reason for space labeling to be an alternative to imposing space standards. Both could apply. Potential residents could compare what is being offered with what is the recommended standard. The Housing Standards must be mandatory, for reasons explained under Q18.

Q17 Would you support the introduction of a benchmark against which the space labelling of new properties is rated? Please give reasons for your answer.

Yes, provided allied to mandatory minimum space standards.

Potential residents could compare what is being offered with what is the recommended standard.

The need to establish benchmarks is overwhelming. Too many poky one and two bedroom apartments have been produced in our towns and cities without adequate space for furniture, storage of clothing, food and waste and for work facilities at home. The

abandonment of Parker-Morris standards has led to the downsizing of new dwellings, so much so that householders may need to seek new accommodation whenever their family increases in size. This cannot be conducive to community stability.

A return to minimum space standards such as Parker-Morris are vital, and some indication of the desirable square metrage of the various size of dwellings must be produced. They would enable prospective householders to assess what is offered. Without standards as a target, developers will never meet the needs and hopes of householders.

As for which the space standards should be, this is for the experts. However, from a residents' point of view: the bigger the better (within reason, or the price goes up). There are several perfectly good models to choose from, though the best is the standard set in London (because it is the biggest). There is also the standard set for social housing across the country (which, to our shame, is bigger than that generally offered in B&NES for "starter" market housing). This is the standard for market housing set by Portsmouth in a recently introduced SPD. Moreover, it is most important that the setting of standards be mandatory, as the Builders cannot be trusted to provide adequate space unless it is mandatory (interestingly, Portsmouth Council tell us there was no complaint from the industry when their SPD came in – the Builders knew where they were and it was the same for all).

Q18 Which of the following best represents your view? Please provide reasons for your views.

- a) Local authorities should not be allowed to impose space standards (linked to access standards) on new development.
- b) Local authorities should only be allowed to require space standards (linked to access standards) for affordable housing.
- c) Local authorities should be allowed to require space standards (linked to access standards) across all tenures.

FoBRA members support the view expressed in 'c' because it is equitable. The standards should be mandatory or otherwise builders will always drive to the lowest (or get away with what they can). Builders' response to imposition of minimum space standards is likely to be that this will put up house prices. However, they seem to accept them in The Netherlands AND have larger, higher quality homes. Is it necessary for Builders to expect profit margins as high as 20% when we are complaining if the utility companies' profits reach 5%?

Q19 Do you think a space standard is necessary (when linked to access standards) and would you support in principle the development of a national space standard for use by local authorities across England? Y/N

Yes, and the standard should be mandatory.

Secondly, we think there are great benefits to be had in making the standard the same across the country, because the Builders can then design houses which will meet the regulations everywhere, but this is less important than making sure that standards exist, and are mandatory.

Q20 Do you agree with the proposed limiting of the scope of any potential space standard to internal aspects only? Y/N

Yes.

In many instances there may not be any external space or it may so limited in extent that standards could not be applied.

Q21 Do you agree that Space Standards should only be applied through tested Local Plans, in conjunction with access standards, and subject to robust viability testing?

Yes.

But the question of 'robust viability' is an issue for developers not for planners or building regulators.

Q22 & 23 These deal with costings and FoBRA members are not competent to answer them.

No comment.

Q24 & 25 We also need to verify how many local authorities are currently requiring space standards, and what those space standard requirements might be. Can you identify any requirements for space standards in local planning policies? – please provide evidence or links where possible.

We know from the trade press that about 100 Local Planning Authorities (LPA) in England do have Space Standards (out of 326, but as all the London LPAs act as one in this respect, this total should be reduced to 295).

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

FoBRA members fully support government wishes to ensure that proper space is provided for the storage of waste.

Q27 Do you agree with this approach to managing cycle storage? Y/N.

Yes

FoBRA members support the need for appropriate space for such storage.

Chapter on Security

Q28 Do you support the view that domestic security for new homes should be covered by national standards/Building Regulations or should it be left to market forces/other?

- a) national standards/Building Regulations
- b) market forces/other

Where possible, please provide evidence to support your view?

No response

Q29 Part 1: Do you think there is a need for security standards? Y/N

No response

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.

No response

Q30 If the level 2 standard is used how do you think it should be applied;

a) On a broad local basis set out in local planning policy?

Or

b) On a development by development basis?

No response

Q31 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?

No response

Q32 If security standards are integrated in to the Building Regulations, would you prefer that;

a) level 1 and level 2 become optional 'regulated options' for use by local authorities? Or

b) level 1 be required as a mandatory baseline for all properties with level 2 a regulated option for use by local authorities?

No comment

Q33 – Q39

No comment

Chapter on Water Efficiency

Q40 Do you agree a national water efficiency standard for all new homes should continue to be set out in the Building Regulations? Y/N.

No response

Q41 Do you agree that standards should be set in terms of both the whole-house and fittings-based approaches? Y/N.

No response

Q42 Do you agree that the national minimum standard set in the Building Regulations should remain at the current Part G level? Y/N. (see also Question 43)

No response

Q43 Do you agree that there should be an additional local standard set at the proposed level? Y/N.

No response

Q44 Do you agree that no different or higher water efficiency standards should be able to be required? Y/N.

No response

Q45 Would you prefer a single, tighter national baseline rather than the proposed national limit plus local variation? Y/N.

No response

Q46 Do you agree that local water efficiency standards should only be required to meet a clear need, following consultation as set out above and where it is part of a wider approach consistent with the local water undertaker's water resources management plan? Y/N.

No response

Q47 Should there be any additional further restrictions/conditions? Y/N.

No response

Q48 & Q49 deal with costs and NORA has no data to offer.

No comment

Q50 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?

No response

Chapter on Energy

Q51 The government considers that the right approach is that carbon and energy targets are only set in National Building Regulations and that no interim standard is needed. Do you agree? Y/N. If not, please provide reasons for your answer.

No response

Q52, Q53, Q54, Q55 & Q56

No response

Chapter on Indoor environmental standards

Q57, Q58, Q59 & Q60

No response

Chapter on Materials

Q61 Do you agree that materials standards are best left to the market to lead on? Y/N.

No response

Chapter on Process & Compliance

Q62 Which of the above options do you prefer (1, 2, or the hybrid approach)? Please provide reasons for your answer.

No response

Q63 Do you think that moving to a nationally consistent set of housing standards will deliver supply chain efficiencies to home builders? Y/N.
If yes, can you provide estimates and evidence of the level of efficiency that could be achieved?

No response

Q64 Do you think that moving to a nationally consistent set of housing standards could help reduce abortive or repeated costs during the construction stage of home building? Y/N.
If yes, can you provide estimates and evidence of the level of efficiency that could be achieved?

No response

21 October 2013

Robin Kerr – FoBRA Secretary