



Department for
Communities and
Local Government

Housing Standards Review

Summary of Responses



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Department for Communities and Local Government
Fry Building
2 Marsham Street
London
SW1P 4DF
Telephone: 030 3444 0000

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Foreword

1. The Government's Housing Standards Review has led to a significant rationalisation of the large number of codes, standards, rules, regulations and guidance applied by local authorities to new housing. The aim was to reduce the cost and complexity of the house-building process, to make it easier to build more new homes, whilst also improving quality and continuing to protect requirements for disabled people, the elderly and the environment. The Review has also had at its heart the need to retain any necessary technical standards in a format that is simpler but fit for purpose.
2. Following an initial consultation in 2013, which considered broader options and principles, the Government is bringing forward a new form of "optional" Building Regulations, covering areas such as access and water, and a new national standard on internal space. These will be available to authorities to apply to new housing if a local need can be established, and provided overall development viability is not jeopardized. The Government also intends to issue a planning statement setting out how the Review proposals will be implemented in the planning system.
3. The Government issued a final package of technical material for consultation between September and November 2014. The consultation included drafts of all the proposed technical standards. These were set out in the form of draft amendments to the Approved Documents which support the Building Regulations. The space standard was set out as a national standard to be applied through planning policy.
4. This consultation analysis report summarises the views expressed by consultees. Overall there were 527 responses to the consultation with a wide range of industry groups answering the specific questions, many of which were supported by additional comments. Around 50 provided separate written submissions. Although the consultation focussed on the technical material, a range of general comments were made. Below is a brief summary of what was proposed in each area and the Government's decisions on the way forward.

Responses by sector:

No	Sector	Response rate	Response number
1	Builders / Developers:	6%	31
2	Local Authority	16%	85
3	Approved Inspector:	2%	9
4	Designers / Engineers / Surveyors:	10%	51
5	Property Management:	2%	10
6	Professional body or institution:	22%	116
7	Research / academic organisation:	2%	9
8	Energy Sector: Fire and Rescue Authority: Manufacturer / Supply Chain:	2%	11
9	Building Occupier:	3%	14
10	Other	36%	191

5. Access. In the consultation the Government proposed that existing minimum requirements for accessibility in Part M of the Building Regulations should be amended to include the introduction of two new optional requirements for higher standards of accessibility. Part M will now have these parts:
 - M4(1) Category 1: VISIBLE dwellings
 - M4(2) Category 2: Accessible and adaptable dwellings
 - M4(3) Category 3: Wheelchair user dwellings

6. There were a number of detailed questions on technical matters. These have been reviewed and the technical standards have been refined in the light of the consultation and with the assistance of a working group comprising both housing developers and access specialists. The revised Approved Document M takes account of these changes. There were some concerns that the Building Regulations (Category 1) may have been changed. This is not the Government's intention and Part M4 (1) has been revised to clarify terms and ensure consistency with existing requirements.

7. For Category 2 dwellings the Government has now set optional regulations broadly equivalent to what was previously known as a "Lifetime Homes" standard, having updated this to make it fit for purpose in modern homes. Regarding Category 3, this encapsulates in one place the most important elements of existing wheelchair guides already published. As a result of the consultation the Government has decided that fully fitted out wheelchair home requirements should only apply where a local authority's allocation policies can match the home to a person. Where such a match cannot be made, homes may be built to a wheelchair adaptable level, enabling full fit-out to be carried out easily, where necessary. The Government has

also decided that where any category of dwelling is subject to a material alteration, it should not be less compliant than with the minimum standards of Category 1 once that work is complete.

8. Space. In the consultation the Government proposed a National Space Standard. This would be available for local authorities to draw on in a policy in their local plan, subject to need and provided the viability test is met. The space standard has now been refined having taken into account consultation responses. The most notable change in approach is with respect to ceiling heights in new dwellings, where the Government has decided that a minimum ceiling height of 2.3m should apply.
9. Water. The consultation set out some proposed changes to the Building Regulations Approved Document G, necessary to deliver an additional water efficiency optional requirement. Where adopted by a local planning authority, the new optional requirement would require new homes to be built so that their estimated water use is no more than 110 litres/person/day (the existing mandatory national requirement is 125 litres/person/day). These changes were widely supported, and the Government proposes no significant changes following consultation.
10. Waste. The consultation set out proposed changes to the statutory Building Regulation Approved Document H, particularly to address the avoidance of future problems of bin blight, and to ensure the design of waste storage was properly considered in new housing development. In the light of consultation responses, the Government intends to make the proposed changes to the guidance, but also to insert a reference to industry guidance on waste storage recently published by the National House Builders Federation Foundation, which provides information about, and examples of, how to design well-considered waste storage.
11. Security. The consultation stated that the Government was minded to implement a security standard, based on the provisions in Publicly Available Specification 24 (PAS 24) as a national mandatory requirement applicable to all new homes. The consultation sought views on the merits of the proposed approach and on the proposed guidance. Having considered all of the responses the Government intends to implement the new requirement as proposed, in a new Part Q of the Building Regulations.
12. Written Ministerial Statement. Finally, the consultation made clear the Government's intention to publish a planning statement when the new system is launched. The purpose of the statement would be to set out how planning authorities should address technical standards for new housing in future, how the new optional building regulations could be applied, and how existing technical standards in plans should apply. The consultation also set out the proposed transitional arrangements.
13. Consultation responses in the main focused on the need for more information about how the transition arrangement would work. The Government has therefore set out more detail for this part of the Statement. Otherwise the main principles in the Statement remain unchanged.

14. Similarly, in the consultation the Government proposed to issue planning guidance to help authorities understand how they can demonstrate a need for an optional higher standard. The consultation document set out what this could look like. There were few comments about this material, and some requests for it to be as clear as possible. A version of the planning guidance will be issued as part of the final package.

15. This report is structured around the questions on each of the technical standards, the principle considerations in adopting the standards, transitional arrangements and the impact assessment. The summaries consist of tables providing a quantitative analysis broken down by sector followed by a qualitative analysis of comments submitted. The 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.

Chapter 1: Access - optional requirements

17. At consultation stage the Government proposed that existing minimum requirements for accessibility in Part M of the Building Regulations should be amended to include the introduction of two new optional requirements for higher standards of accessibility. These new Requirements are to be known as;
- M4(1) Category 1: Visitable dwellings
 - M4(2) Category 2: Accessible and adaptable dwellings
 - M4(3) Category 3: Wheelchair user dwellings
18. Subsequent to review of consultation responses the technical requirements set out in supporting statutory guidance have been reviewed and refined to ensure that they are suitably fit for purpose. In broader terms, Government has decided that fully Wheelchair Accessible requirements should only be applied where a local authority's allocation policies apply. Government also intends that that where any category of dwelling is subject to a material alteration, it should not be less compliant than with the minimum standards of Category 1 once that work is complete.
19. The consultation asked a number of specific questions in relation to the technical implementation of proposed changes to access standards in Approved Document M (Access to and use of buildings). Whilst the questions focused on the specifics of the proposed Optional Requirements, respondents also expressed a range of views on which questions were not asked. Typically around a third of those who answered the specific question also provided some form of additional written comment on each of the questions. These are summarised below and not repeated in relation to the summary of response to specific questions.
20. A significant number of respondents set out that in their view Category 2 requirements (for accessible and adaptable dwellings) should be made mandatory rather than continuing with use of Category 1 requirements (for Visitable dwellings). There was strong support for existing requirements amongst these respondents for Category 1 to be reviewed, and it was also suggested that a proportion of all new development should be built to Category 3 as a mandatory requirement (rather than an optional requirement). These respondents also typically expressed concern as to the impact of needs test and viability testing on the ability of local authorities to require accessible housing standards, and there was some concern as to the costs of meeting these tests. There was a generally held view that further guidance on what suitable provision might be needed to ensure that accessible housing needs were properly met in local authority policies.
21. Conversely, a significant minority (about one fifth) of respondents who provided written responses expressed concern as to the likely impact on new development of local authorities requiring accessible housing standards, and in particular questioned whether this would affect the viability of new housing being built. Many of these respondents suggested that it was difficult to understand what impact requirements for Category 2 and Category 3 housing might have on development in the absence of any indication of what proportion of development might be

required to meet these standards. Other concerns related to impacts on the first time buyer market; the implication of higher access standards being required of later stages of phased development; the impact on specialist sector such as retirement housing; and the need to ensure that requirements, particularly for the category 3 Optional requirements are proportionate and based in robust evidence.

Question - 3 - Do you think that the technical requirements for Category 1 – visitable dwellings are directly comparable to the technical requirements of the existing guidance in Sections 6 to 10 of Approved Document M (Access to and use of buildings)?

Table 1:																						
Q3	Summary		Builders / Developers:		Local Authority		Approved Inspector:		Designers / Engineers / Surveyors:		Property Management:		Professional body or institution		Research / academic organisation:		Energy Sector:		Building Occupier:		Other	
	Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
a. Agree	113	52.1%	7	6.2%	32	28.3%	1	0.9%	15	13.3%	1	0.9%	22	19.5%	0	0	2	1.8%	3	2.7%	30	26.5%
b. Mostly agree	75	34.6%	3	4.0%	21	28.0%	1	1.3%	10	13.8%	3	4.0%	15	20.0%	3	0	1	1.3%	1	1.3%	17	22.7%
c. Disagree	29	13.3%	10	34.5%	2	6.9%	3	10.3%	4	0.0%	0	0.0%	4	13.8%	0	0	0	0.0%	1	3.4%	5	17.2%
Total	217	100%	20	9.2%	55	25.3%	5	2.3%	29	13.4%	4	1.8%	41	18.9%	3	1.4%	3	1.4%	5	2.3%	52	24.0%

22. Whilst a majority of respondents agreed that the proposals for Category 1 standards reflect existing requirements in Approved Document M (Access to and use of buildings), a significant minority identified areas where the re-drafting process appeared to amend these requirements. Specific issues identified as being at variance included changes relating to gradients; approach criteria; suitable ground surface; steeply sloping plots and sites; some aspects of ramped approach and lift provision; implications for stepped approach including requirements for a level threshold; and differences in dimensions for door position and WC position in the downstairs WC.

Question - 4 - Do you think that the technical requirements of the proposed guidance for Category 2 – accessible and adaptable dwellings are correct?

Table 2																						
Q4	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
a. Agree	95	45.0%	4	4.2%	29	30.5%	1	1.1%	12	12.6%	1	1.1%	18	18.9%	0	0.0%	2	2.1%	3	3.2%	25	26%
b. Agree only in part	85	40.3%	8	9.4%	21	24.7%	1	1.2%	12	14.1%	2	2.4%	18	21.2%	3	3.5%	3	3.5%	0	0.0%	17	20%
c. Disagree	31	14.7%	9	29.0%	5	16.1%	2	6.5%	4	12.9%	0	0.0%	4	12.9%	0	0.0%	0	0.0%	1	3.2%	6	19%
Total	211	100%	21	42.7%	55	71.4%	4	8.7%	28	39.7%	3	3.4%	40	53.0%	3	3.5%	5	5.6%	4	6.4%	48	66%

23. Whilst the largest number of responders (45%) entirely agreed with proposals for category 2 requirements, 40% only agreed in part, with nearly 15% disagreeing entirely. Builders and developers were most likely to disagree entirely (9 out of 21 responses) or in part (8 out of 21 responses). A majority of approved inspectors also disagreed (2 out of 4) with the proposals. A significant number and range of views were expressed in the written responses that were submitted in addition to answering the main question, particularly by those who only agreed in part. Comments were both supportive and critical of the proposed requirements, but the majority tended to suggest higher or alternative standards than those set out in the proposed approved document. .

24. The most commonly raised issues were in relation to whether Clear Opening Width or Effective Clear Opening Width should be adopted to measure door openings; dimensions for various aspects of approach width for both corridors and ramps; requirements for handrails and step nosings; size and design of car parking provision and drop off points; the need for landings and circulation zones to be clear of door swings; the position of doors within the door reveal in very highly insulated homes; dimensions of landings and covered entrances; whether the width of private stairs should be 900mm or 850mm; the size of clearances between kitchen units and ongoing concern at the difficulty of meeting requirements for glazing heights whilst complying with regulatory requirements for guarding of windows. Proposals were also made with reference to height and location of consumer units, as well as other switches and controls.

25. Sanitary provision was one area in particular that attracted significant comment. Concern was expressed that the loading value for strengthened walls might not be sufficient where very high point loads are applied; that higher level of provision should be made for accessible toilets and level access showers in all properties; that flush controls need to be made accessible; that larger access zones were need in all WC's and bathrooms; that through floor lift provision should be taken into account; and that dimensions as shown for sinks and basins protruding into access zones were too large.

Question - 5 - Do you think that the technical requirements of the proposed guidance for Category 3 – wheelchair user dwellings are correct?

Q5	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.
a. Agree	92	47.7%	5	5.4%	27	29.3%	1	1.1%	10	10.9%	1	1.1%	17	18.5%	1	1.1%	2	2.2%	3	3.3%	25	27%
b. Agree only in part	77	39.9%	5	6.5%	18	23.4%	1	1.3%	12	15.6%	2	2.6%	19	24.7%	2	2.6%	1	1.3%	0	0.0%	17	22%
c. Disagree	24	12.4%	9	37.5%	6	25.0%	2	8.3%	3	12.5%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	4.2%	3	13%
Total	193	100%	19	49.4%	51	77.7%	4	10.7%	25	39.0%	3	3.7%	36	43.2%	3	3.7%	3	3.5%	4	7.4%	45	0%

26. Whilst the largest proportion of respondents (48%) entirely agreed with the proposals, a significant number agreed only in part (40%) or entirely disagreed (12%). Disagreement was strongest amongst builders and developers, and Approved Inspectors, whilst support was strongest from local authorities. A significant range of views were expressed in the written responses accompanying answers to the main questions and mainly these related to very specific technical considerations as to how homes are best designed to meet the needs of wheelchair users.

27. The most commonly raised issues related to the dimensions; gradients and provision of ramped and stepped approaches; clear opening width requirements for gates, external doors and internal doors; handrail provision to both sides of ramps or steps; size; design, number and location of car parking spaces and drop off points; a wide range of suggestions in relation to controls and services, particularly window controls, door entry and boiler/ heating controls; size and number of lifts provided; whether fully furnished layouts should be required; corridor and hall widths; size and location of wheelchair storage space; that all through floor lift provision should be accessed from circulation spaces; requirements for habitable accommodation and kitchens at entrance level; detailed commentary on size and design of kitchen layouts; size of bedrooms.

28. As with Category 2 standards, there were extensive and detailed comments on the proposals for sanitary provision, and most of these were very highly technical in nature, often with reference to particular aspects of the accompanying diagrams. The most important issues raised included dimensions for position of WC's from adjacent walls; the need for accessible flush controls, the number, size and location of accessible WC's in flats; the need for significantly larger turning zones; the need for access zones to be maintained clear underneath hand rinse and wash-hand basins; issues of sanitary fittings protruding into access zones; whether strengthened walls would be adequate for all point loads; the need for fittings to be height adjustable with flexible plumbing and tiled splash backs.

Question - 6 - When do you think that the requirement for a dwellings to be wheelchair accessible (fitted out) should apply?

Table 4																						
Q6	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or Institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
a. Only where local authority allocation policies apply	74	34.4%	14	18.9%	23	31.1%	1	1.4%	9	12.2%	4	5.4%	11	14.9%	0	0.0%	1	1.4%	1	1.4%	10	14%
b. Across any tenure where a local authority believes this is necessary	81	37.7%	3	3.7%	26	32.1%	0	0.0%	13	16.0%	0	0.0%	16	19.8%	2	2.5%	0	0.0%	1	1.2%	20	25%
c. All wheelchair housing should be fully wheelchair accessible	60	27.9%	4	6.7%	13	21.7%	2	3.3%	6	10.0%	0	0.0%	12	20.0%	1	1.7%	1	1.7%	2	3.3%	19	32%
Total	215	100%	21	9.8%	62	28.8%	3	1.4%	28	13.0%	4	1.9%	39	18.1%	3	1.4%	2	0.9%	4	1.9%	49	23%

29. Responses to this question were relatively evenly split; with most respondents (38%) indicating that fully wheelchair accessible requirements should be applicable across any tenure where a local authority believes this is necessary, with 34% believing they should apply only where a local authorities allocation policies apply, and 28% believing all properties should be fully wheelchair accessible. Many respondents noted that whilst the majority of need was in the social rented sector, there was a wider shortage of wheelchair accessible housing in other tenures. It was also suggested that specialised housing for older people was one area where increased need for wheelchair accessible housing will be required in the future.

30. Other respondents noted that local authorities should only be able to require fully accessible wheelchair housing where they have robust and compelling evidence of need, citing the impact of large costs associated with wheelchair housing on viability. It was also suggested that an approach whereby purchasers in the private sector could require a wheelchair accessible home 'off plan' would be advantageous, and there was quite broad support for ensuring fit out requirements applied only where the occupant was known. There was a repeated view that providing wheelchair adaptable units in most circumstances was a sensible approach. Other options included having a minimum requirement in Building Regulations with local authorities able to set higher requirements if necessary, or building all new homes to fully wheelchair accessible standards.

Question - 7 - Which of the following best reflects your views?

- a. I agree with the extent to which accessibility requirements are required in the proposed standards.
- b. I agree that where dwellings are required to be fully accessible they should include one or more of the following at point of fit out: (i) Shallow insulated sink in the kitchen, (ii) Height adjustable worktops in kitchens, (iii) Height adjustable sinks, (iv) Plumbing which is installed to work with height adjustable sinks (but not the height adjustable equipment itself), (v) Other.

Q7	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
a. I agree with the extent to which accessibility requirements are required in the proposed standards.	96	52.7%	13	13.5%	20	20.8%	1	1.0%	16	16.7%	1	1.0%	20	20.8%	0	0.0%	2	2.1%	1	1.0%	22	23%
b. I agree that where dwellings are required to be fully accessible they should include one or more of the following at point of fit out: (i) Shallow insulated sink in the kitchen, (ii) Height adjustable worktops in kitchens, (iii) Height adjustable sinks, (iv) Plumbing which is installed to work with height adjustable sinks (but not the height adjustable equipment itself), (v) Other.	86	47.3%	5	5.8%	27	31.4%	2	2.3%	9	10.5%	3	3.5%	16	18.6%	3	3.5%	0	0.0%	3	3.5%	18	21%
Total	182	100%	18	9.9%	47	25.8%	3	1.6%	25	13.7%	4	2.2%	36	19.8%	3	1.6%	2	1.1%	4	2.2%	40	22%

31. A small majority of respondents (53%) agreed with the extent to which fully accessible properties should be fitted out at completion. Written responses highlighted a number of issues including that fully wheelchair accessible units were often let at completion to non-wheelchair households, resulting in more specialised features being immediately removed; that individual wheelchair users needs are very difficult to anticipate in advance of knowing details of a specific occupiers requirements; and that where allocation policies were not effective there was considerable wastage and redundant cost in providing high levels of fit out which could be more effectively targeted and used in meeting wheelchair household needs.

32. Conversely, some responses highlighted the difficulty in ensuring adaptations in private sector (owned or rented) properties are affordable, noting limitations on Disabled Facilities Grant funding with a number suggesting that local authorities could take commuted sums to cover the cost of adaptations where these arise.

Question - 8 - Where dwellings are required to be fully accessible they should include one or more of the following at point of fit out (select all that apply);

Q8	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
i) Shallow insulated sink in the kitchen	55	55.4%	1	1.8%	18	32.7%	1	1.8%	6	10.9%	2	3.6%	11	20.0%	2	3.6%	0	0.0%	2	3.6%	12	22%
ii) Height adjustable worktops in kitchens	62	62.4%	2	3.2%	20	32.3%	1	1.6%	6	9.7%	2	3.2%	10	16.1%	2	3.2%	0	0.0%	2	3.2%	17	27%
iii) Height adjustable sinks	57	57.4%	1	1.8%	16	28.1%	1	1.8%	5	8.8%	2	3.5%	11	19.3%	2	3.5%	0	0.0%	0	0.0%	17	30%
iv) Plumbing which is installed to work with height adjustable sinks (but not the height adjustable equipment itself).	72	72.3%	3	4.2%	21	29.2%	2	2.8%	11	15.3%	3	4.2%	13	18.1%	2	2.8%	1	1.4%	0	0.0%	16	22%
v) Other (please specify)	33	32.7%	1	3.0%	11	33.3%	1	3.0%	5	15.2%	0	0.0%	4	12.1%	1	3.0%	2	6.1%	1	3.0%	7	21%
Total	279		8	2.9%	86	30.8%	6.0	2.2%	33.0	11.8%	9.0	3.2%	49.0	17.6%	9	3.2%	3	1.1%	5	1.8%	69	25%

33. A majority of respondents supported inclusion of all of the listed features with flexible plumbing being the most strongly supported requirement, and height adjustable worktops, sinks and an insulated sink also strongly supported. Written comments accompanying the answer to this question highlighted certain details including a widely held view that it was more important that fittings could be adjusted in height easily at a later date rather than be fitted with height adjusting mechanisms at the point of completion.

34. A number of other additional requirements were suggested including; pull out storage, carousels and shelving in kitchens; high level kickboards beneath units; lever operation taps; large rocker switches and controls; 450mm clear space beneath all sink /basin drainage and services; height adjustable oven enclosure; all bathrooms being fitted out as wet rooms at point of completion; installation of fire sprinkler systems; measures to address electromagnetic hypersensitivity; and integrating dementia friendly design considerations throughout the property.

Question - 9 - Should regulation 3 continue to apply in relation to material alterations of dwellings?

Q9	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
a. Yes.	125	55.3%	10	8.0%	42	33.6%	3	2.4%	15	12.0%	1	0.8%	21	16.8%	2	1.6%	1	0.8%	2	1.6%	28	22%
b. No particular view.	64	28.3%	6	9.4%	6	9.4%	0	0.0%	13	20.3%	2	3.1%	14	21.9%	0	0.0%	4	6.3%	0	0.0%	19	30%
c. No	37	16.4%	5	13.5%	10	27.0%	0	0.0%	6	16.2%	1	2.7%	7	18.9%	0	0.0%	0	0.0%	1	2.7%	7	19%
Total	226	100%	21	9.3%	58	25.7%	3	1.3%	34	15.0%	4	1.8%	42	18.6%	2	0.9%	5	2.2%	3	1.3%	54	24%

35. A majority of respondents (55%) believe that regulation 3 should still apply in relation to material alteration of dwellings, with 28% having no particular view and 16% believing it should be dis-applied. Written responses accompanying the consultation provided a range of views with some suggesting that given the lack of accessible housing this was critical; others indicating that it was only logical to maintain accessibility once it had been invested in at the time of construction, and some others stating that the most important aspects of accessibility were not likely to be removed whether the regulation applied or not.
36. Whilst many believed that it was important that the accessibility of new dwellings was maintained, there was broad recognition that households should be able to remove or amend certain adaptations and features without the need to make a building control application, or in doing so risk contravening the Building Regulations. As a result, a significant number of respondents who supported retaining the applicability of Regulation 3 also proposed that this should relate only to the principal aspects of a property's accessibility (level approach, thresholds, door widths, circulation space, and critical overall size of rooms such as bedrooms and bathrooms) but not necessarily to fixtures and fittings including sanitary fittings. A number of other respondents proposed that all categories of dwelling should comply with the minimum requirements (Category 1) of Part M following a Material Alteration, allowing some flexibility but retaining the most critical features.

Chapter 2: Nationally described space standard

37. At consultation stage the Government proposed that a National Space Standard should be published which would be optional for local authorities to adopt where they wished to set space standards in new Development. This will be a planning standard, not an optional building regulation. The space standard has been refined having taken into account consultation responses. It should be noted that following consultation on the minimum ceiling height which might be set within the space standard, the Government has decided that the requirement should be set at a minimum height of 2.3m.

38. A number of questions were posed regarding how the space standard should be framed and how it might then be implemented and policed by local planning authorities and building control bodies. In response, there were a number of more general points made across the range of specific questions, for example, that issues relating to space should be left to the market, that viability and supply would be adversely affected and that certain circumstances might make aspects of the standard inappropriate to apply. The summary below does not repeat these more general points in the summary of responses to each of the questions and these are mainly covered at Question 10 below.

Question - 10 - Do you agree the Government's proposals for a single level of requirements in the nationally described space standard?

Q10	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
a. Yes	137	59.0%	6	4.4%	49	35.8%	1	0.7%	28	20.4%	4	2.9%	20	14.6%	1	0.7%	3	2.2%	1	0.7%	24	18%
b. No particular view	43	18.6%	2	4.7%	6	14.0%	1	2.3%	2	4.7%	0	0.0%	18	41.9%	1	2.3%	1	2.3%	1	2.3%	11	26%
c. No	52	22.4%	13	25.0%	13	25.0%	1	1.9%	5	9.6%	1	1.9%	3	5.8%	1	1.9%	1	1.9%	1	1.9%	13	25%
Total	232	100%	21	9.1%	68	29.3%	3	1.3%	35	15.1%	5	2.2%	41	17.7%	3	1.3%	5	2.2%	3	1.3%	48	21%

39. Two hundred and thirty-two (232) people responded to this question and of those, almost three-fifths agreed with the proposals set out in the consultation. However, within that, many respondents had suggestions about particular aspects of the proposed approach. Further, certain points/concerns were raised by both those that largely agreed with the proposed approach, for example, that the space standard should apply to all new homes and not be left to local discretion.

40. Opposition to the proposed space standard was most significant from builders/developers with more than double the number opposing the space standard than supporting it. The more fundamental concerns which were put forward as reasons to object to the proposals were that: space should be left to the market/there was no current market failure; there would be an adverse impact on viability/supply/choice; and, the approach was insufficiently flexible to deal with different situations or did not work well for some types of housing, for example, those created through a change of use or for retirement homes.
41. As well as calls for flexibility in how the space standard was applied, there was also some concern that local authorities would be restricted to only using the one nationally described space standard. The argument was put forward that this was unduly restrictive and other alternative standards should be acceptable where a local authority was able to justify it. There was also a more general concern, particularly from local authorities, about the burden imposed on them in demonstrating the need for a space standard and understanding how that might impact on house builders (with a fear that viability arguments would prevent a space standard being required). Conversely, there was concern from builders/developers that local authorities would not properly consider the cost and impact on development of such a standard. Further/more specific guidance was called for to explain what was required from local authorities on this point.
42. With regard to the actual space requirements themselves (as set out as Gross Internal Areas in the standard), there were both suggestions that these should be higher and that they should be lower. Of the former, a number suggested that the proposed national standard was inferior to that set out in the London Plan which was used by many London Boroughs. However, it was also suggested that a slightly lower standard than that proposed in the consultation might be appropriate in local authority areas with less buoyant housing markets.
43. A number of further detailed technical points were made and will be considered as part of the process to finalise the space standard. For example, it was suggested that Table 1 of the Nationally Described Space Standard, by referring to one person dwellings with one bed space as “studios”, might impact on the provision of small one person flats on brownfield sites in higher cost parts of the country. Other, more technical points are also considered below in response to Questions 11, 12 and 13 below.

Question - 11 - Do you agree with Government’s proposals for internal storage?

Q11	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or Institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
a. Yes	109	48.0%	2	1.8%	36	33.0%	1	0.9%	23	21.1%	3	2.8%	17	15.6%	1	0.9%	2	1.8%	1	0.9%	23	21%
b. No strong views	74	32.6%	5	6.8%	15	20.3%	1	1.4%	8	10.8%	1	1.4%	20	27.0%	1	1.4%	3	4.1%	1	1.4%	19	26%
c. No	44	19.4%	13	29.5%	15	34.1%	1	2.3%	3	6.8%	1	2.3%	3	6.8%	0	0.0%	0	0.0%	2	4.5%	6	14%
Total	227	100%	20	8.8%	66	29.1%	3	1.3%	34	15.0%	5	2.2%	40	17.6%	2	0.9%	5	2.2%	4	1.8%	48	21%

44. The breakdown of responses was similar to the previous question, albeit with more respondents saying they had no strong view as to how internal storage should be treated in the standard. Many of the concerns were based on objections to having any space standard at all. However, a number of consultees agreed with the principle of a specific requirement for internal storage within the standard, but indicated that the amount of storage proposed was simply too small. This sometimes stemmed from concerns that fixed services and equipment (particularly in more energy efficient modern homes) would leave insufficient room for other additional household storage needs.
45. Others suggested more space was needed for additional items such as bicycles and pushchairs - particularly in flats where there was less likely to be external storage space. A number of other respondents suggested that as well as internal storage, the standard should also include a requirement for external storage space to be provided. It was also suggested that the standard failed to factor in the increased storage demands resulting from the increasing numbers of people working from home.
46. In addition to the amount of storage provided, there were also some calls for the standard to be more prescriptive in specifying where storage should actually be provided within the dwelling. Similarly, some respondents thought there should be specific provision of space that would accommodate taller items such as ironing boards. Questions also arose about whether built in wardrobes counted towards storage provision and there were more general questions as to what built in storage was and how it should be measured.
47. Respondents also questioned the methodology that underpins the storage element of the standard. A number had concerns that storage requirements were derived from the number of bedrooms rather than the number of people the property was designed for. This was seen by some as a particular concern in larger properties.
48. However, others questioned whether it was necessary to prescribe the amount of space provided for storage at all. This was generally on the basis that whilst the overall space standard needed to have factored in the need for storage into the overall space requirements, there is greater flexibility in simply allowing the householder to determine how and where they wished to store their belongings.

Question - 12- Do you agree with the proposed requirements for bedrooms and bedroom sizes?

Q12	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
a. Yes	111	49.3%	3	2.7%	35	31.5%	2	1.8%	23	20.7%	3	2.7%	15	13.5%	1	0.9%	3	2.7%	1	0.9%	25	23%
b. No strong views	65	28.9%	4	6.2%	16	24.6%	0	0.0%	5	7.7%	1	1.5%	22	33.8%	1	1.5%	1	1.5%	1	1.5%	14	22%
c. No	49	21.8%	14	28.6%	13	26.5%	1	2.0%	6	12.2%	1	2.0%	2	4.1%	0	0.0%	1	2.0%	2	4.1%	9	18%
Total	225	100%	21	9.3%	64	28.4%	3	1.3%	34	15.1%	5	2.2%	39	17.3%	2	0.9%	5	2.2%	4	1.8%	48	21%

49. Whilst nearly half of respondents (49%) agreed with proposed bedroom sizes, almost three out of ten people that responded to this question had no strong views. In line with the previous question, there was some concern that the minimum standard needed to be a little bigger (again with a number of London Boroughs suggesting it should be the same requirement as in the London Plan). It was argued that a more generous minimum would better provide adequate circulation space around the bed and make the space more adaptable to meet future needs relating to age, illness or disability. Some suggested that furniture layouts should be required to ensure the space was actually usable. It was also suggested that it needed to be clarified where this minimum measurement should be taken in the bedroom, specifically whether in irregular-shaped rooms the minimum is the narrowest dimension.

50. Others argued, as with storage, that as long as the Gross Internal Area was set at the right level, minimum bedroom sizes were unnecessary and should be left to designers to address. Conversely others said minimum room sizes should also be applied to other rooms such as living rooms and kitchens. Alternatively it was suggested a standard should apply to the smallest bedroom only. Also in relation to single bedrooms, it was suggested that the proposed minimum standard might be too small to allow for the proper ventilation of these rooms.

Question - 13 - Do you agree with the Government’s proposed approach to ceiling heights as set out in the proposed nationally described space standard?

Table 11																						
Q13	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or Institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
a. Yes	99	42.9%	1	1.0%	31	31.3%	2	2.0%	20	20.2%	3	3.0%	17	17.2%	0	0.0%	4	4.0%	2	2.0%	19	19.2%
b. No strong	65	28.1%	3	4.6%	15	23.1%	0	0.0%	5	7.7%	1	1.5%	20	30.8%	2	3.1%	1	1.5%	1	1.5%	17	26.2%
c. No	53	22.9%	16	30.2%	11	20.8%	1	1.9%	10	18.9%	1	1.9%	5	9.4%	0	0.0%	0	0.0%	0	0.0%	9	17.0%
d. Other approach	14	6.1%	0	0.0%	9	64.3%	0	0.0%	1	7.1%	0	0.0%	1	7.1%	0	0.0%	0	0.0%	0	0.0%	3	21.4%
Total	231	100%	20	8.7%	66	28.6%	3	1.3%	36	15.6%	5	2.2%	43	18.6%	2	0.9%	5	2.2%	3	1.3%	48	21%

51. While nearly 70% of respondents supported proposals or had no strong views, there was particular concern amongst the 23% of respondents who disagreed about this aspect of a possible standard. In addition to the previous general concerns about a space standard and the consequent impact on build cost, there were particular fears about the practical impact of a minimum ceiling height requirement. A number of respondents noted that not only would there have to be additional brick courses, but the fact that the standard plaster board size is 2.4m would mean there would be greater cost and waste related to this element of construction. Others said that there would be an impact on stairs resulting in a greater part of a dwelling being taken up by circulation, rather than living space. It

was also suggested that the higher height per storey might impact adversely on scaffolding techniques which reflect current safety legislation. As each storey would be higher, it was also suggested there would be eventual impacts on fire safety requirements for taller buildings. More generally, there may be challenges in matching build heights and window lines to surrounding buildings leading to other issues in terms of planning acceptability.

52. Further, it was argued that the proposed approach would run counter to the Government’s desire for more energy efficient homes with a number citing a likely 8% energy increase for heating (with the consequent cost to the occupier of the dwelling). It was also put forward that this might make compliance with the energy efficiency requirements of Part L of the Building Regulations more difficult to achieve given the potential impact on the Dwelling Emission Rate.
53. However, there was also significant support for the inclusion of a minimum ceiling height with many arguing a 2.5m minimum standard ensured good quality development that properly considered important issues such as overheating, indoor air quality and daylighting – the last of these being particularly important in high density, urban settings. Indeed some argued that exceptionally it may be desirable to go beyond 2.5m to ensure development is acceptable in these circumstances. Others, whilst supporting a minimum ceiling height, suggested 2.4m, 2.35m or 2.3m would better reflect existing industry practice whilst still ensuring acceptable minimum standards. Variations also included proposals for a national minimum standard, with local flexibility to require higher where necessary.
54. The proposed space standard suggested the minimum ceiling height should apply to at least 75% of the “main living space” Gross Internal Area. A number of respondents suggested there needed to be greater clarity as to which rooms made up this space. Others feared the approach to apply the minimum height to a proportion of the total space may still allow rooms which provided inadequate ceiling height, with some suggesting there should be a further minimum height for the remaining 25%. Again, flexibility also emerged as an issue with worries that attic rooms, for example, should be exempt from the ceiling height requirement.

Question - 14 - Would you agree that Government should continue to explore the potential role of building control bodies in providing plan checking and type approval of the nationally described space standard?

Q14	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or Institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.
a. Yes	134	59.0%	11	8.2%	38	28.4%	2	1.5%	19	14.2%	3	2.2%	23	17.2%	1	0.7%	2	1.5%	1	0.7%	34	25.4%
b. No strong views	59	26.0%	7	11.9%	14	23.7%	0	0.0%	7	11.9%	1	1.7%	15	25.4%	1	1.7%	3	5.1%	1	1.7%	10	16.9%
c. No	34	15.0%	3	8.8%	8	23.5%	1	2.9%	9	26.5%	0	0.0%	5	14.7%	0	0.0%	0	0.0%	1	2.9%	7	20.6%
Total	227	100%	21	9.3%	60	26.4%	3	1.3%	35	15.4%	4	1.8%	43	18.9%	2	0.9%	5	2.2%	3	1.3%	51	22.5%

55. While just over a quarter expressed no strong view, almost three-fifths of respondents indicated a desire for Government to explore the potential role of building control bodies in this regard. Indeed many saw building control bodies as the obvious body to carry out such tasks given their involvement in the development process. Many suggested that, in particular, type approvals offered an opportunity to streamline the process and deliver resource and time savings for both house builders and local authorities. Some respondents also suggested that bodies other than the building control body might also serve a similar function, for example, energy assessors.

56. However, others took a different view arguing that as the space standard would remain a planning, rather than Building Regulations, matter the responsibility should rest with the local planning authority. It was argued that as other aspects of the development would be being considered alongside this, and that the ability to check plans for compliance were well within the expertise of planners, the involvement of the building control body would not necessarily be beneficial. Similarly, others argued that as the ultimate enforcement powers would continue to rest with the planning authority so should responsibility for plan checking. Others thought building control involvement would work best where that function was also carried out by the local authority (rather than an Approved Inspector).

57. Another practical concern regarding a possible role for the building control body was whether they would be involved sufficiently early in the process as one might not even have been chosen when a planning application is first considered. In terms of early consideration of such matters, the point was also made that it would be important for the local planning authority to be clear about the standards required when any pre-application planning advice was provided to a developer.

58. There were also some questions about how these services might be funded no matter who carried out the job. Also, there were concerns whether the regulatory framework which governs Approved Inspectors would allow them to carry out the function in the way suggested.

Question - 15 - How do you think on site compliance with space standards would best be checked?

Q15	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
a. At individual local planning authority discretion	46	20.4%	5	10.9%	18	39.1%	0	0.0%	3	6.5%	0	0.0%	7	15.2%	1	2.2%	1	2.2%	1	2.2%	10	21.7%
b. Checking by the building control body providing plan checks	72	32.9%	4	5.6%	15	20.8%	1	1.4%	19	26.4%	3	4.2%	18	25.0%	0	0.0%	1	1.4%	1	1.4%	10	13.9%
c. Through conditions requiring the relevant Gross Internal Areas to be published as part of the property sales particulars	54	25.5%	3	5.6%	16	29.6%	2	3.7%	5	9.3%	1	1.9%	7	13.0%	0	0.0%	2	3.7%	0	0.0%	18	33.3%
d. By another approach	48	21.3%	7	14.6%	16	33.3%	0	0.0%	6	12.5%	1	2.1%	6	12.5%	0	0.0%	0	0.0%	1	2.1%	11	22.9%
Total	220	100%	19	8.6%	65	29.5%	3	1.4%	33	15.0%	5	2.3%	38	17.3%	1	0.5%	4	1.8%	3	1.4%	49	22.3%

59. The analysis in the table demonstrates that there was no clear consensus as to which of the three possible ways to check on site compliance was most appropriate. In addition, many of those that suggested another option actually favoured a combination of the other options rather than a single different alternative (most often a combination of checking by the building control body and through conditions requiring publication of the dwelling space with the sales particulars).
60. Underpinning some responses were concerns about whether the space standards would be properly policed at all and whether new homes would therefore actually comply. In addition, it was pointed out that making sure the initial plans actually complied would be crucial as it would be very difficult to enforce against plans that had been previously approved even if they did not actually meet the minimum space standards.
61. Many respondents thought that space labelling of new homes could provide an additional useful check and provide important information for consumers. Others questioned whether there was additional benefit given that sales particulars would already usually provide information on sizes and as these particulars are covered by the Property Misdescriptions Act should be considered a reliable means of ensuring compliance. Some, however, made the point that sales details would not be relevant for all housing tenures. Others suggested that information required for the Energy Performance Certificate or the Standard Assessment Procedure for energy efficiency might usefully provide similar, reliable information.

Question - 16 - Further comments: We would be interested in understanding any further views you have on the Government Proposed approach to the introduction of a nationally described space standard.

62. The nature of the question meant there were a wide ranging set of points made, many of which have already been covered above in response to specific questions. Some comments were of a more general nature, for example, that there needed to be arrangements in place to allow for existing space policies in local plans to be able to continue without the need for additional work to justify their application, and similarly that these policies need to be to the new nationally described standard to allow them to be “passported” in this way.
63. Others questioned the methodology for determining the space standard, suggesting it be simplified to consider only the number of bedrooms or being more prescriptive by requiring additional bathrooms/toilets in larger properties.
64. There was also some concern that the space standard may not be able to be applied to certain changes of use where permitted development rights applied and the planning authority therefore did not grant express planning approval.
65. On more technical points, there were comments that there needed to be greater clarity as to where the measurements that determine the Gross Internal Area should be taken from and whether the scale of the plans suggested (at 1:100) was too onerous. A number of points were also suggested as needing to be better considered as part of the analysis contained in the Impact assessment of the likely costs and benefits of the proposals.

Chapter 3: Security - mandatory requirement

66. The consultation paper stated that the Government was minded to implement a security standard, based on standard the provisions of British Standard PAS 24, as a national mandatory requirement applicable to all new homes. This consultation sought views on the merits of the proposed approach and on the proposed guidance.

67. Having considered all of the responses the Government intends to implement the new requirement as proposed. The guidance has been refined in response to specific comments, summarised below.

Question - 17- The Government is minded to implement the security standard as a national mandatory requirement. Do you agree with this approach?

Q17	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
Yes	308	88.3%	8	2.6%	56	18.2%	5	1.6%	25	8.1%	4	1.3%	85	27.6%	3	1.0%	4	1.3%	8	2.6%	110	35.7%
No	41	11.7%	11	26.8%	4	9.8%	0	0.0%	8	19.5%	1	2.4%	8	19.5%	0	0.0%	4	9.8%	1	2.4%	4	9.8%
Total	349	100%	19	5.4%	60	17.2%	5	1.4%	33	9.5%	5	1.4%	93	26.6%	3	0.9%	8	2.3%	9	2.6%	114	32.7%

68. Three hundred and forty nine (349) people responded to this question and there was widespread (88%) support for taking the security standard forwards as a mandatory requirement for all new homes. Strongest support was from 'Other' organisations including strong representation by the police service and associated individuals.

69. Some respondents did, however, question whether this was necessary. This was a view expressed particularly, but not exclusively, by builders and developers many of whom argued that the National House Builders Council standards were adequate.

70. Several respondents commented on the draft approved document providing useful editorial and technical suggestions and queries. These comments included the following;

- some respondents questioned the way that the draft approved document referenced alternative standards to PAS 24 via the 'Secured By Design' scheme. It was suggested that other standards should be listed directly

- various comments sought greater clarity/restrictions on how the performance of a product is demonstrated against the standard. In particular there were concerns about test reports being 'cascaded' from one manufacturer to another and suggestions that certification by third party schemes would offer better certainty of compliance
- there was some confusion about whether roof windows and roof lights were affected by the requirement
- whilst the proposed appendix for bespoke doorsets was generally well received some respondents asked if similar rules for other materials such as aluminium and UPVC should be provided
- concerns were expressed by some respondents that imposing PAS 24 on communal doors (entrances to blocks of flats) could be unreasonably onerous and cause technical problems
- several comments were also received relating to the interaction between the new requirement and existing requirements for access and emergency egress.

Chapter 4: Water efficiency - optional requirements

71. The consultation paper set out the proposed changes to the Building Regulations, Approved Document G and accompanying guidance necessary to deliver a new water efficiency optional requirement. Where adopted by a local planning authority, the new optional requirement would require new homes to be built so that their estimated water use is no more than 110 litres/person/day (the existing mandatory national requirement is 125 litres/person/day).

72. While the focus of the consultation was ensuring the changes were technically correct, many respondents made more general points about the approach proposed, for example, whether the optional requirement should be set through a national Building Regulation, whether the standard should be even tighter or whether there should even be water efficiency requirements for new homes at all. The summary of responses below focuses on comments relating to whether the proposed changes are technically correct rather than the underlying policy. The Government proposes no significant changes following consultation.

Question - 18 - Are the proposed changes to Approved Document G technically correct?

Q18	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or Institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
a. Yes	67	32.5%	10	14.9%	24	35.8%	1	1.5%	4	6.0%	0	0.0%	13	19.4%	0	0.0%	0	0.0%	1	1.5%	14	20.9%
b. No particular view	111	53.9%	6	5.4%	24	21.6%	0	0.0%	21	18.9%	2	1.8%	21	18.9%	1	0.9%	4	3.6%	1	0.9%	31	27.9%
c. No	28	13.6%	1	3.6%	9	32.1%	2	7.1%	6	21.4%	1	3.6%	2	7.1%	0	0.0%	0	0.0%	1	3.6%	6	21.4%
Total	206	100%	17	8.3%	57	27.7%	3	1.5%	31	15.0%	3	1.5%	36	17.5%	1	0.5%	4	1.9%	3	1.5%	51	24.8%

73. Of the 206 consultees who responded to this question, over half indicated they had no particular view as to whether they were technically correct. Over two-thirds of the remainder agreed with the proposed changes, with only 28 respondents (14%) disagreeing.

74. Of those that were not in agreement, there was some concern about the way in which the guidance in Approved Document G described how the optional requirement would operate and how this would be communicated to the building control body. It was suggested that the guidance in Approved Document G was unclear and also not consistent with other Approved Documents with an optional

requirement by not making clear in the *Performance* section that it is the builder's responsibility to inform the building control body that the optional requirement applies. Another response suggested it was not clear whether the notification of the water efficiency calculation was to the local authority or the building control body.

75. One respondent was concerned the technical amendments to the regulations made it seem that the water efficiency standard would no longer apply to dwellings created through a change of use. It was suggested that there should be no change to the scope of Part G.
76. More generally, there was concern about the onus of establishing the need for a water efficiency requirement being placed on the local authority. Greater clarity in the guidance as to when a standard would be acceptable was also requested. It was also suggested that consultation on a policy to require an optional requirement was unnecessary if the Government and Environment Agency establish an evidence base as to where a standard is acceptable. There were also concerns that considering the impact on viability might prevent a water efficiency standard being required even where it was needed. Finally, one respondent suggested that the Impact assessment did not properly consider the cost to water companies if a water efficiency standard was not required.

Chapter 5: External waste storage - optional requirements

77. The consultation set out proposed changes to the statutory guidance in Approved Document H to help ensure new housing development properly considered the design of waste storage and thereby avoided future problems of bin blight. In the light of consultation responses, the Government intends to make the changes to the guidance, but also now insert a reference to industry guidance on waste storage recently published by the National House Builders Council Foundation which provides information about, and examples of, how to design well-considered waste storage.

78. In particular, the consultation asked if the proposed changes to Approved Document H6 would reinforce the importance of good design of waste storage. Over 200 people responded to each of the three questions posed (Q19, Q20 & Q21), with less than 10% disagreeing. Eighty seven (87) of the respondents provided wide ranging comments, many upon the principles rather than the matters of detail we were consulting on. Reasons for not agreeing included:

- waste is a planning issue and not a Building Regulations issue
- regeneration could be prevented
- measures don't go far enough and should include internal waste storage provisions from the Code for Sustainable Homes provisions and accessibility.

79. Although comments were wide ranging, some themes emerged from those agreeing with the proposed changes, with requests for:

- clarification that H6 applies where change of use occurs through permitted development
- examples of satisfactory design solutions
- collection schemes should be standardized
- sufficient space should be provided for several recycling bins and to allow for future changes in collection practices.

80. It was also suggested that reference should be made in the revised Approved Document H to industry guidance being prepared by the NHBC Foundation which would set out examples of good practice in the design of external waste storage in new housing developments.

Question - 19 - Do you agree with the proposed changes to reinforce the importance of good design for external waste storage?

Table 16																									
Q19			Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or institution		Research / academic organisation		Energy Sector		Building Occupier		Other		
Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
a. Yes	143	63.5%	8	5.6%	45	31.5%	2	1.4%	24	16.8%	4	2.8%	24	16.8%	1	0.7%	2	1.4%	2	1.4%	31	21.7%			
b. No particular views	61	27.1%	9	14.8%	9	14.8%	1	1.6%	6	9.8%	0	0.0%	16	26.2%	0	0.0%	4	6.6%	1	1.6%	15	24.6%			
c. No	21	9.3%	1	4.8%	7	33.3%	1	4.8%	3	14.3%	0	0.0%	2	9.5%	0	0.0%	0	0.0%	0	0.0%	7	33.3%			
Total	225	100%	18	8.0%	61	27.1%	4	1.8%	33	14.7%	4	1.8%	42	18.7%	1	0.4%	6	2.7%	3	1.3%	53	23.6%			

Question - 20 - Do you agree with the proposed changes to reinforce that the provisions relate equally to where dwellings are created through a material change of use?

Table 17																									
Q20			Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or institution		Research / academic organisation		Energy Sector		Building Occupier		Other		
Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
a. Yes	154	70.0%	13	8.4%	53	34.4%	3	1.9%	22	14.3%	3	1.9%	20	13.0%	2	1.3%	2	1.3%	2	1.3%	34	22.1%			
b. No particular views	56	25.4%	5	8.9%	4	7.1%	0	0.0%	6	10.7%	1	1.8%	20	35.7%	0	0.0%	3	5.4%	0	0.0%	17	30.4%			
c. No	10	4.6%	0	0.0%	2	20.0%	0	0.0%	3	30.0%	0	0.0%	3	30.0%	0	0.0%	0	0.0%	1	10.0%	1	10.0%			
Total	220	100%	18	8.2%	59	26.8%	3	1.4%	31	14.1%	4	1.8%	43	19.5%	2	0.9%	5	2.3%	3	1.4%	52	23.6%			

Question - 21 - Do you agree with the proposed technical changes to provide clarification of existing requirements?

Table 18																									
Q21			Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or institution		Research / academic organisation		Energy Sector		Building Occupier		Other		
Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
a. Yes	120	58.0%	4	3.3%	47	39.2%	3	2.5%	17	14.2%	2	1.7%	14	11.7%	1	0.8%	3	2.5%	1	0.8%	28	23.3%			
b. No particular views	74	35.7%	8	10.8%	11	14.9%	0	0.0%	9	12.2%	0	0.0%	23	31.1%	1	1.4%	1	1.4%	1	1.4%	20	27.0%			
c. No	13	6.3%	3	23.1%	3	23.1%	0	0.0%	4	30.8%	1	7.7%	2	15.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%			
Total	207	100%	15	7.2%	61	29.5%	3	1.4%	30	14.5%	3	1.4%	39	18.8%	2	1.0%	4	1.9%	2	1.0%	48	23.2%			

Chapter 6: Principle considerations in adopting optional requirements and nationally described standards

81. The consultation set out the principles of how optional requirements and the nationally described space standard might operate. It set out the most likely issues that would be evaluated in bringing the new standards into operation, and considered whether planning guidance might need to be updated in light of these changes. Respondents were asked whether they agreed with these principles.

Question - 22 - Do you agree with the Governments proposed approach as to how the use of optional requirements and nationally described space standard should be taken forward?

Q22	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
a. Yes	60	25.5%	3	5.0%	15	25.0%	1	1.7%	10	16.7%	1	1.7%	7	11.7%	1	1.7%	2	3.3%	2	3.3%	18	30.0%
b. No strong views	64	27.2%	2	3.1%	15	23.4%	0	0.0%	7	10.9%	1	1.6%	18	28.1%	1	1.6%	3	4.7%	0	0.0%	17	26.6%
c. No	111	47.2%	13	11.7%	39	35.1%	2	1.8%	16	14.4%	3	2.7%	16	14.4%	0	0.0%	0	0.0%	1	0.9%	22	19.8%
Total	235	100%	18	7.7%	69	29.4%	3	1.3%	33	14.0%	5	2.1%	41	17.4%	2	0.9%	5	2.1%	3	1.3%	57	24.3%

82. Two hundred and thirty-five (235) people responded to this question and of these, 47% disagreed with the principles while 25% agreed. A further 27% said they had no strong views on the matter.

83. Of those who disagreed, there was particular concern about the optional nature of the standards and limiting the ability of Local Authorities to require additional standards above those emerging from the Review. There was a strong view that a robust evidence base was required to support the application of standards. One respondent said that the basic principles involved in the assessment and evidencing of need for the proposed standards must be completely consistent and transparent from authority to authority, with clarity over what constitutes concepts such as viability. There was a view that tests for viability did not appear to give consideration to socio economic issues and potential benefits to health and well-being from improved housing standards for elderly people and those with impairments. One respondent said that the space standard may lead to inconsistencies and challenge, and those who imposed the new standard may be disadvantaged by developers choosing to work in areas where the standards were not applied. There was also concern that Local Authorities might seek to apply the standards above those from the Review leading to costly appeals.

Chapter 7: Transitional arrangements and proposed policy intent

84. This section of the consultation set out how the Housing Standards Review will be implemented. In particular, the timing of its introduction, how existing standards in plan polices and permissions should be treated in planning terms, how the policy would be taken into account in the preparation of plans, and how the transition to the new approach should work.

Question - 23 - Do you agree the proposed approach will be sufficient to ensure local planning authorities and neighbourhood planning qualifying bodies in future only set policies requiring compliance with the optional requirements and nationally described space standard to address a clear and evidenced need? If not, please indicate why.

Q23	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.
Yes	95	46.6%	4	4.2%	26	27.4%	1	1.1%	10	10.5%	1	1.1%	25	26.3%	0	0.0%	3	3.2%	2	2.1%	23	24.2%
No	111	53.4%	14	12.6%	29	26.1%	2	1.8%	19	17.1%	2	1.8%	16	14.4%	1	0.9%	1	0.9%	1	0.9%	26	23.4%
Total	206	100%	18	8.7%	55	26.7%	3	1.5%	29	14.1%	3	1.5%	41	19.9%	1	0.5%	4	1.9%	3	1.5%	49	23.8%

85. Two hundred and six (206) people responded to this question and of those, just under half (47%) agreed with the approach. The majority of those who agreed were from Professional Bodies or Institutions, where as Designers, Engineers, Surveyors, Builders and Developers were the largest number of those who disagreed.

86. One respondent said there should be a nationally defined methodology to help authorities establish clear evidence of need. Another urged the Government to ensure that local authorities clearly demonstrated that there would be no adverse impacts on housing supply or the housing market in their area. It was suggested that a very strong statement was required to instil confidence in the process and realise the proposed benefits. There were concerns that “passporting” would allow existing policies to go forward unchallenged.

Question - 24 - Do the proposed arrangements provide the correct balance between allowing time for developers and local authorities to adapt to the new regime whilst delivering benefits as quickly as is reasonable? If not, please indicate why.

Table 21																						
Q24	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or institution		Research / academic organisation		Energy Sector		Building Occupier		Other	
	Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
Yes	102	52.0%	7	6.9%	22	21.6%	1	1.0%	15	14.7%	2	2.0%	23	22.5%	0	0.0%	4	3.9%	2	2.0%	26	25.5%
No	94	48.0%	9	9.6%	33	35.1%	2	2.1%	14	14.9%	0	0.0%	11	11.7%	2	2.1%	1	1.1%	1	1.1%	21	22.3%
Total	196	100%	16	8.2%	55	28.1%	3	1.5%	29	14.8%	2	1.0%	34	17.3%	2	1.0%	5	2.6%	3	1.5%	47	24.0%

87. One hundred and ninety-six (196) people responded to this question. 52% of respondents agreed that the proposed arrangements provided the correct balance. This included the majority of Professional bodies or institutions, over half of the Local Authorities and just under half of Designers, Engineers and Surveyors. 48% disagreed, including about half of the Builders and Developers who responded.

88. There was concern about how the implementation and transition stages would work in practice and whether sufficient detail had been provided to enact the changes in the time available. About half of respondents considered that authorities will comply with the new arrangements. Most responses, from all sectors, called for a lot more information about transitional arrangements, especially in regard to the passporting of policies and details about which policies may fall or remain untouched. Many consider the transition period to be very short, and raise questions about local authority time, skills, or resource implications.

Chapter 8: impact assessment

89. Following the 2013 consultation, a more detailed impact assessment was produced for the technical consultation. This was published together with an accompanying cost report, survey of local authority planning policies and evidence report detailing analysis behind the assumptions underlying the impact assessment. In line with the Better Regulation Framework Manual guidance for impact assessments, the focus for this impact assessment was on the costs and benefits of this deregulatory policy to business, although it also contained significant information on wider social impacts.

Question - 25 - Do you have any comments on the analysis in the impact Assessment Paper?

Q25	Summary		Builders / Developers		Local Authority		Approved Inspector		Designers / Engineers / Surveyors		Property Management		Professional body or institution		Research / academic organisation		Energy Sector		Building Occupier		Other			
	Option	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
Yes	34	16.3%	6	17.6%	5	14.7%	0	0.0%	4	11.8%	0	0.0%	9	26.5%	1	2.9%	1	2.9%	1	2.9%	7	20.6%		
No	174	83.7%	8	4.6%	47	27.0%	3	1.7%	27	15.5%	3	1.7%	32	18.4%	1	0.6%	5	2.9%	2	1.1%	46	26.4%		
Total	208	100%	14	6.7%	52	25.0%	3	1.4%	31	14.9%	3	1.4%	41	19.7%	2	1.0%	6	2.9%	3	1.4%	53	25.5%		

90. Two hundred and eight (208) people responded to this question and the vast majority (84%) had no comments. Of the 16% who commented, a number pointed out that social and environmental benefits, such as health, well-being, energy fuel bills, CO2 emissions, water use, are not monetised in the summary cost benefit analysis of the impact assessment and so not fully taken into account. They suggest that the impact assessment summary sheet only captured the costs and benefits to business.

91. Others were concerned that the impact on fuel poverty was not taken into account. Some respondents were concerned that the impact assessment did not strike the right balance between the needs of developers and the needs of particular occupants, for instance, disabled people and their families and friends.

92. A small number of respondents were of the view that the Impact assessment underestimates the costs of introducing nationally described standards to the local plan process, overestimates the process costs of current standards or underestimates the transition and process costs of the new standards.