

## Section 1 – Applicability and implementation of proposed HCA core standards

At least as important as the content of the standards are the issues of applicability, implementation and phasing. Currently the mandatory elements of the design and quality standards associated with the HCA's National Affordable Housing Programme are mostly applicable to social rent homes, whereas the mandatory quality standards associated with HCA's Property and Regeneration projects are applicable to all types of development on HCA owned land.

We wish to use this consultation to gain industry wide views on the approach which consultees would prefer the HCA to adopt.

### Overall

- 1 Given the balance to be struck between available resources and delivering high quality housing, and that spending more on higher standards could result in reduced delivery; do you agree with increasing standards?

**N**

Please use the space provided to add brief comments as explanation or comment on your response.

*Caution must be taken that any radical decrease in the number of units the HCA fund is not countered with an argument that any units that are built are of an increased standard over previous years. It is of course correct to aspire to increase the standards for new social housing, but this should be weighed against a greater set of harms of not meeting actual housing need. Any increase in standards (and therefore cost) must be made in areas that have real positive impacts on the households that live within them.*

### Applicability

Further detail regarding the scope of the proposed standards and their **applicability** is provided within the consultation supporting evidence base.

- 2a Having read the proposals for the application of the HCA's core minimum standards do you think they should apply to:

#### Affordable Rent

- a) Social Rent **Y**

#### Intermediate Market

- b) Shared ownership **N**  
 c) Intermediate market rent **Y**  
 d) Shared equity **N**

#### Private Market

- e) Private market sale **Y**

*The Council's recently adopted 'Managing Development and the Environment Development Plan Document (MDE DPD) encourages proposals for new residential development to achieve Code for Sustainable Homes Level 4:  
<http://www.tmbc.gov.uk/cgi-bin/buildpage.pl?mysql=3690>*

## Implementation and phasing

Further detail regarding **potential implementation scenarios** and **associated cost impacts** are provided within the consultation supporting evidence base.

**2b** Should the core minimum standards be introduced at the same time in all of the types of development in which they will apply?

**N**

**2c** If you think the core minimum standards should be phased in, please indicate which year you think they should be phased below. Please use the space provided to add brief comments to explain or comment on your choice.

*It is not possible to name a year and apply this nationally, the approach adopted must be a flexible one taken on a site by site basis. Different schemes with different phasing and funding setups will naturally suit this transition of standards to different degrees – a mandatory “switch over” data could be dangerous on grounds of viability.*

*The space standards should apply to general needs socially rented units, but there should be a degree of flexibility of intermediate tenures that maintain a degree of choice over occupancy.*

## Section 2 - Space and functionality

### Space

Currently the mandatory standards of both HCA predecessor organisations contain requirements regarding the minimum size of homes. Further detail regarding proposed **dwelling space criteria** is provided within the consultation supporting evidence base.

**3a** Do you agree that internal space standards should remain part of the HCA's minimum core standards?

**Y**

**3b** If Yes, do you consider that the minimum internal dwelling sizes set out in the consultation are pitched:

*a) At a reasonable level*

b) Too low

c) Too high

**3c** If No, why?

### Functionality

It can be argued that simply meeting a minimum size requirement, does not necessarily guarantee that a well designed successful and efficient internal layout will result. Additional space can be wasted due to inefficient circulation and unusable space. It may therefore be beneficial to include functionality requirements in conjunction with minimum space standards, enhancing the liveability of homes.

Further detail regarding proposed **dwelling functionality and storage** is provided within the consultation supporting evidence base.

4 a Do you agree that space standards, should be supported by internal layout criteria?

Y

4b If Yes, should the criteria be demonstrated by:

- i. *The extent to which specified benchmark room sizes are met?* or
- ii. Stipulation of minimum room sizes? or
- iii. Provision of internal layouts showing furniture and circulation?

Note that the Housing Quality Calculator accompanying this consultation is based upon option 4b (i) above.

4c If No, why?

### Storage

Inadequate provision for storage within the home is an important issue that is regularly considered by residents, particularly those in social rented accommodation where spare rooms or garages are not provided. To ensure proper consideration of this issue within the design process the HCA is proposing to mandate storage provision, however we need to measure this in a simple and non burdensome way.

5a Do you agree that storage provision should be mandated in HCA core standards?

Y

5b In dealing with the way in which minimum **general** storage requirements are expressed; which of the options set out below are preferred:

- i. *Expressed as a **percentage** (5%) of internal dwelling space (deemed included within the dwelling gross floor area)*
- ii. Expressed as a **percentage** (5%) of internal dwelling space as above, with stipulations that storage should be adjacent to the function that it serves

5c In dealing with the way in which minimum **kitchen** storage requirements are expressed;

- iii. Do you agree that dedicated kitchen storage should be provided over and above general storage requirements?

Y

If Yes, which of the options set out below are preferred:

- iv. Expressed as an **additional percentage** of the recommended internal dwelling space for kitchen provision (deemed included within the dwelling gross floor area) and as a result, linked to dwelling occupancy?
- v. *Expressed as a **volume** with minimum requirements in terms of shelving, drawer and worktop provision in relation to dwelling occupancy?*

**5d** External storage is for items such as bicycles, lawn mowers, gardening tools, barbecues and fuel, DIY equipment and garden furniture. Need external storage space for recycling bins and composting areas.

**Please indicate below whether you agree or disagree with how standards should deal with the way external storage requirements are expressed.**

vi. Dedicated external storage should be provided over and above general storage requirements?

**Y**

vii. Guidance should be provided as to location and provision requirements to take account of the specific storage requirements of houses and flats?

**Y**

### **Open Space**

The provision of private open space is seen as an important criterion in the achievement of housing quality and has been built into the Housing Quality Calculator. As a result, we are proposing a strong expectation that balconies will be provided in all cases where there is no other private external space, but projects will not be ruled out on this basis alone. For instance, there may be high quality communal space nearby, the planning consent may have identified overlooking issues or the design may be such that balconies can only be provided at disproportionate cost.

Further detail regarding proposed open space approach is provided within the consultation supporting evidence base.

**6a** We propose that the new Housing Quality Calculator will trigger the need for additional HCA technical scrutiny for homes that do not have that access to a garden, balcony or terrace. Do you agree with this non-mandatory approach?

**Y**

**6b** If No, do you think that every flat, apartment or maisonette, which is without access to a garden, should have a private balcony or terrace?

**6c** The Housing Quality Calculator is predicated upon the size of private balcony or terrace provision being in a range of 5–9 m<sup>2</sup>. In the case of ground floor flats, apartments or maisonettes with private access to a garden, the garden must be at least 8m<sup>2</sup> to meet the benchmark.

Do you think that these private open space ranges are pitched:

*i. At a reasonable level?*

ii. Too low?

iii. Too high?

7 If necessary, please provide brief comments as to the key reasons for your responses using question number references.

*As ever emphasis should be on overlooked play space for socially rented family units, and pressure to move away from schemes that have **contributed sums** for outside space that can be spent some distance from the original scheme, that is of questionable use to the actual residents. Any revision to standards relating to Balcony provision should be mindful at all times to possible negative impacts on service charges, depending on how imaginative the design solutions are.*

### **Section 3 - Environmental sustainability (including standards included within the code for sustainable homes):**

#### **The Code for Sustainable Homes**

Launched by the Government in December 2006, the Code for Sustainable Homes (CSH) called for a step change in the way new homes are designed and constructed, and introduced a 1 to 6 star rating system to communicate the overall sustainability performance. It is an environmental assessment method for rating and certifying the performance of new build homes, designed to replace the Eco-Homes standard in driving continuous improvement in the house building industry. The Code was adopted as a standard by the HCA predecessor bodies and the NAHP and Property & Regeneration programmes all currently work to a minimum standard of Code level 3.

The Government has set a clear policy objective of zero net emissions of carbon dioxide from all energy use in new homes from 2016. The HCA's predecessor bodies required higher CSH standards than were required by regulation. A key consideration of this approach was that this would lead to learning which would in return reduce costs when standards were applied across the sector as a whole. The proposal to move to Code 4 from April 2011 continues this process. Although any firm proposal would be the subject of future consultation, a further move to Code level 6 in April 2014 would be the logical next step in continuing this approach.

Further detail regarding proposed Sustainability criteria is provided within the consultation supporting evidence base.

**8a** Do you agree that new build dwellings securing funding / approval under new programmes commencing April 2011 should be required to achieve Code for Sustainable Homes (CSH) level 4?

***N** - CSH4 should be aspired to but not mandatory at a time when the house building industry is under such pressure. It is expected that with decreased public subsidy the grant per unit will be lower, and as such not support a transition to higher build standards. The direction of travel should support this aim, but it must be flexible in these challenging times so as to not negatively impact deliverability.*

*Code Level 4 should be encouraged, as set out in Policy CC1 in the Council's recently adopted MDE DPD (April 2010). The requirements of category ENE1 in the Code will be mandatory in 2013 through revisions to the Building Regulations, so there is no reason why such a standard should not be encouraged now, where it is feasible and viable.*

**8b** Are there any measures which would assist the industry in progressing from CSH level 3 to higher Code levels?

*Realistic grant per unit levels that allow this to occur.*

### **Lifetime Homes**

Government is committed to the principle of ensuring that homes are accessible to people throughout their lives. This commitment was expressed in a policy of requiring all publicly funded housing to meet the Lifetime Homes standard from 2011.

In the current consultation on The Code for Sustainable Homes, Government has announced plans to delay making the Lifetime Homes Standard mandatory at Code level 4 in 2010, and will be undertaking a review of policy on Lifetime Homes in 2010. The HCA is supportive of the principles contained within Lifetime Homes, Lifetime Neighbourhoods and is committed to actively participate in the forthcoming review of Lifetime Homes policy announced as part of the Government's Pre-Budget Statement as well as CLG's consultation on the Code for Sustainable Homes.

Further details on consultations and reviews relevant to Lifetime Homes: Paragraphs 21, 119-137 and Question 24 are relevant to Lifetime Homes considerations.

Further detail regarding proposed Lifetime Homes criteria is provided within the consultation supporting evidence base

**8c** Do you believe that Lifetime Homes should be made mandatory for all HCA funded housing from April 2011?

**Y**

If you would you favour an alternative approach, which of the following alternatives would you prefer the HCA to adopt?

- i. Incorporation of Lifetime Homes as a Core standard from April 2011? (subject to current consultation on Code changes)
- ii. HCA recommends and incentivises the achievement of maximum Lifetime Home credits within the Code but does not include them within core standards?
- iii. HCA recommends and incentivises the achievement of at least THREE of the four available Lifetime Home credits within the Code but does not include them within core standards?
- iv. Other (please state)

### **Security**

**9a** Do you agree that the HCA should continue to support security through the provision of requiring the maximum additional credits for internal physical security of the home within the Code for Sustainable Homes?

**Y**

**9b** If No, do you consider that:

- i. Full Secured by Design **Certification** should be an additional HCA requirement? or
- ii. **Certification** should be recommended only?

**10** If necessary, please provide brief comments as to the key reasons for your responses using question number references

## **Section 5 – Equality and diversity**

The HCA values diversity and is committed to ensuring that it considers equality and diversity in everything that it does. As a public body we have a legal responsibility uphold our statutory duties for race, gender and disability. We recognise that design and quality have an impact on equality outcomes based on the diversity of our neighbourhoods and communities now and in the future. Given that the HCA will develop specialist design and quality standards in the future:

Further detail regarding the **HCA Equality Impact Assessment – Stage 1** is provided as part of the consultation supporting evidence base.

**13a** Do you agree that the proposed general needs housing core standards set out in this consultation document reasonably take due regard for the need to:

- Work towards the elimination of discrimination?

**Y**

- Promote equality of opportunity?

**Y**

**13b** Do you believe that the proposed core standards need to take into account any other issues relating to equality and diversity?

**N**