HCA Proposed Core Housing Design and Sustainability Standards Consultation

March 2010 – Consultation Questions

This following consultation questions should be answered following consideration of the HCA consultation web pages.

When completing your feedback, please be aware that your responses are not saved until you select ‘submit’ at the end of the form. Should you close the form or lose internet connection before this point, your responses will be lost. If you wish to print a copy of the consultation form in order to prepare you answers and comments beforehand, a PDF of the questions is available.

The consultation will close to allow responses to be compiled and for analysis to begin at the close of 17 June 2010. A report will be published later in the year.

Links to the relevant sections of the proposed standards’ evidence base are provided within the form should you wish to review them.

View the ERS Research Privacy Policy Statement for Online Surveys.
View the HCA website legal policy.

About you

Before leaving your feedback, please complete the section below about yourself and your organisation. We need this information in order to ensure that this consultation is fair and transparent; it will be treated confidentially and used solely for the purpose of analysis, for example to see how opinions vary across sectors or geographically. Your responses will not be attributed to you or your organisation unless you state otherwise (see below).

• Your name:

• Your job title (if applicable):

• Your employer:

• Which of the following descriptions best applies to your responses:

  Private individual / Tenant / Resident
  House builder
  Developer
  Contractor
  Architect
  Engineer
  Employer’s agent
  Professional body / trade organisation
  Interest Group
  Local Authority
  Registered Social Landlord (RSL)
  Other public body – please specify
  Other – please specify
Please select the appropriate region from the list:

- East of England
- East Midlands
- London
- North West
- North East
- South West
- South East
  (Milton Keynes / Other)
- West Midlands
- Yorkshire & the Humber

If you would like your responses to be attributable to you, please indicate below;

I would like my responses to be attributable to me
I would like my responses to be attributable to my organisation
I would prefer my responses to remain anonymous
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March 2010 – Consultation Questions

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? Y/N

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

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/N

   Intermediate Market
   b) Shared ownership Y/N
   c) Intermediate market rent Y/N
   d) Shared equity Y/N

   Private Market
   e) Private market sale Y/N

Implementation and phasing

Further detail regarding potential implementation scenarios and associated cost impacts are
provision 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? **Y/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.

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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/N

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

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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.
HCA Proposed Core Housing Design and Sustainability Standards Consultation

March 2010 – Consultation Questions

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

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/N

   If No, why?

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/N

   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. Please indicate below whether you agree
HCA Proposed Core Housing Design and Sustainability Standards Consultation

March 2010 – Consultation Questions

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/N

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

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/N

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 m². In the case of ground floor flats, apartments or maisonettes with private access to a garden, the garden must be at least 8m² 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.
HCA Proposed Core Housing Design and Sustainability Standards Consultation

March 2010 – Consultation Questions

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? Y/N. If not, why not?

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

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/N
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

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

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/N

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 4 - Building for life:

The 20 point “Building for Life” standard was developed by the housebuilding industry in conjunction with CABE and other experts and is now administered by CABE. The standard places homes in their wider placemaking context. It was designed to focus attention on the quality of a development’s integration with its surroundings in a manner that does not add cost, if it is incorporated sufficiently early in the design process.

Further detail regarding the proposed Building for Life approach is provided with the current version of the Code of Conduct for accredited assessors.

11a Do you agree that the Building for Life criteria should form part of the HCA’s minimum core standards? Y/N

11b If Yes, do you agree that the achievement of at least 14 out of the 20 Building for Life criteria should be a minimum requirement for all new build schemes? Y/N

11c If No, why?

To support local authorities in assessing the design quality of new housing, CABE is facilitating the development of a network of accredited assessors who will be responsible for carrying out Building for Life (BfL) assessments of schemes in their areas. To create and maintain consistency and quality in approach Local authority staff who wish to be BfL accredited assessors are required to:

- Have a graduate or postgraduate qualification in urban design, landscape design, architecture or planning
- Successfully complete a CABE training and assessment programme
- Operate in accordance with a code of conduct to be administered by CABE

11d HCA and CABE are discussing the feasibility of developing a similar programme for staff in HCA development partner organisations to support them, saving time and costs, in carrying out comprehensive BfL assessments of the schemes for which HCA support is being sought.

Do you, or your organisation, have sufficient in-house staff with the relevant qualifications that could be trained as accredited assessors to enable you to carry out and provide BfL assessments of schemes for which you are seeking HCA support? Y/N

11e If not, what would be your preferred approach to carrying out and providing HCA with a thorough Building for Life assessment for schemes for which you are seeking HCA support?

If necessary, please provide brief comments as to the key reasons for your responses using question number references.
HCA Proposed Core Housing Design and Sustainability Standards Consultation

March 2010 – Consultation Questions

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/N
- Promote equality of opportunity? Y/N

13b Do you believe that the proposed core standards need to take into account any other issues relating to equality and diversity? Y/N Please state below your reasons for stating this.

The HCA website contains further information regarding the HCA’s approach to Equality and Diversity.

To continue to review the HCA proposed core housing design and sustainability standards consultation web site.

To return to start of the HCA proposed core housing design and sustainability standards consultation web site.