



A Review of Local Standards for the Delivery of New Homes

Local Housing Delivery Group
(Standards Working Group)

June 2012



Supported by



About the Local Housing Delivery Group

The Local Housing Delivery Group is a cross-industry group involving a broad group of stakeholders with an interest in home building in England.

It was set up in 2011 to respond to the Government's challenge to boost the delivery of new homes, to simplify housing standards where possible, and to support growth and high standards in home building by helping local authorities and developers find agreed ways in which they can fulfil their obligations under the new National Planning Policy Framework (NPPF).

The Local Housing Delivery Group was chaired by Sir John Harman. On the steering group were:

Stewart Baseley, Home Builders Federation

Cllr Ed Turner, Local Government Association

Ian Davis, NHBC

Michael Rich, Homes and Communities Agency

Keith Holland, Planning Inspectorate

Mike Holmes, Planning Officers Society

Paul King, Independent member

Russell Reefer, Local Government Association

Nick Scregg, Persimmon Homes

John Stewart, Home Builders Federation

Imtiaz Farookhi

David Marchant, NHBC (Secretariat)

Simon Brown, DCLG observer

The steering group also established two working groups – one (chaired by the Homes and Communities Agency) to develop advice on the best way to test the viability of Local Plans, and the other (chaired by NHBC) to recommend ways to simplify the locally applied standards regime.

The views expressed in this report reflect the general views and consensus of the steering group as a whole but not necessarily the views of any one contributor.

Foreword

On behalf of the Local Housing Delivery Group, I have pleasure in presenting the report of our Standards Working Group which has been looking at the various non-statutory requirements commonly placed on new home building through the planning process, and the scope to simplify them.

I would like to thank the team of professionals from many disciplines who have given up their time to the work of the group over the last few months.

A range of standards - from promoting security through to limiting carbon impact - all seek to ensure important aspects of quality in our homes. Yet even their most enthusiastic advocates would agree that they have been created independently and there is room for simplifying the demands they place on planners and the designers and builders of new homes.

Like others, we have identified significant scope for simplification. But of equal importance is the need for a system within which both current and future proposals for standards can be examined and implemented, so as to ensure they can play an effective role in the planning system.

In many ways this is an interim report, and we have identified the important next stage of work that must be done. However, for that work to be effective requires the joint authority that can only come from our commissioning bodies, the Local Government Association and the Home Builders Federation, and Government. With that support we are confident that planning authorities can be provided with a coherent set of practical standards, derived from the present complex menu and capable of being used in a targeted and discriminating way within the National Planning Policy Framework.

This is not merely a technical tidying up of a cluttered workspace. Our companion report 'Viability Testing Local Plans – Advice for planning practitioners' offers balanced advice to planning authorities on the practical assessment of viability of Local Plans. One aspect of this is that planners will need to factor in the cumulative policy cost placed on new home building by adoption of the very standards we are dealing with here.

Today, when new home building is near a historic low point yet housing need is increasing, a system which seems designed to amplify, by its complexity, the cost of building homes of good quality is unjustifiable. We hope that this report will provide the springboard for the creation of a more coherent and practicable system of standards in new housing.

Sir John Harman
Chairman
Local Housing Delivery Group

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Executive Summary

The house-building industry has to work with a large number of complex and overlapping standards, many of which are applied at local level. The decision to implement a certain standard, and the level at which it is set, is not always clear cut. This lack of clarity is difficult for local planning authorities and for developers.

Achieving compliance with these standards in combination presents a significant challenge to the house-building industry. The costs of achieving compliance and the burden and costs of demonstrating compliance can be significant, and in some circumstances can have an impact on viability. Considerable knowledge and experience are needed to implement the sometimes conflicting requirements in a sensible manner that delivers homes of high standards and takes full account of the consumer's interest.

Consequently, the Local Housing Delivery Group (chaired by Sir John Harman) was established and a specific Standards Working Group started work in September 2011 in response to the Housing Minister's pledge to overhaul the standards applied to housing development in England.

Our task on the Standards Working Group was to identify the standards most commonly applied locally on housing developments and to make recommendations for rationalisation, while ensuring that development remains viable, sustainable, of a high standard, and the consumer is protected.

The 10 most commonly applied standards were identified and reviewed by the Standards Working Group. There was general agreement that complying with the large number of often overlapping standards and their many requirements can be demanding and costly for the house-building industry and can have an adverse effect on the viability of some developments.

The Standards Working Group established criteria for credible standards. These included requirements for good evidence of the local need for the standard, a clear understanding of costs and benefits as well as general support for the standard among a broad range of interests.

Against these criteria a review was undertaken of current standards that apply in the four topic areas of accessibility, energy, security and water. Based upon this exercise we agreed that there is indeed scope to develop simplified and harmonised standards and that, if subject to similar scrutiny, similar agreement could be reached in other topic areas.

We have made a number of recommendations relating to the continuation of this work by a properly constituted and representative cross-sector Industry Group.

Our advice is being presented to Government in this report which recommends that further resources from Government are put in place to complete this work – including the development of comprehensive, independent 'Government endorsed' advice clearly setting out costs, benefits and issues associated with each of the standards.

Sir John Harman and the Local Housing Delivery Group would particularly like to thank all the Standards Working Group members:

Ian Davis, NHBC (Chair)
Michael Black, Bovis Homes Ltd
Jane Briginshaw, Homes and Communities Agency
Simon Brown, Department for Communities and Local Government
Andrew Burke, National Housing Federation
Andrew Day, Countryside Properties (UK) Ltd
Angela Godrich, Notting Hill HA
Andy Howe, Environment Agency
Neil Jefferson, Zero Carbon Hub
Robin Nicholson, Edward Cullinan Architects
Rebecca Roberts-Hughes, RIBA
Mike Kiely, London Borough of Croydon
John Slaughter, Home Builders Federation
Dame Helena Shovelton, British Lung Foundation
Stephen Tapper, London Borough of Enfield
Neil Smith, NHBC

Additional representatives attending workshop and/or providing additional support:

Kirk Archibald, Fairview New Homes
Alex Ely, mae LLP Architects
Richard Harral, Department for Communities and Local Government
Steve Ingram, Huntingdonshire District Council
Paul King, Independent member
Nicky Linihan, Planning Officers Society
Debbie Mathieson, Homes and Communities Agency
Paul McGivern, Homes and Communities Agency
Julia Park, Levitt Bernstein
Richard Partington, Richards Partington Architects

Introduction to the work of the Standards Working Group

In November 2010 the Housing Minister, Grant Shapps MP, pledged “an overhaul of the complicated building standards that make it hard for developers to complete their projects...to end the ‘alphabet soup’ of local building standards and red tape that blight efforts to get developments started, and sweep away the bureaucratic assessment regimes that accompany them.”

He invited the house-building industry to come forward and help develop a new system for local standards so that new development would meet the needs of local communities, without placing an unnecessary strain on developers.

Following this announcement there was a lot of debate in the industry with detailed consideration of whether and how a ‘Local Standards Framework’ could be developed. At that time the Local Standards Framework was conceived as a clearly costed menu of standards from which planning authorities would be able to select priorities, the overall intention being that the effect on viability of individual developments would be more transparent and more widely understood.

Emerging from the discussions came the consensus that local policy requirements often entail costs that can, in themselves or in combination with other local requirements, affect the viability of development. People agreed that there is a need to simplify and rationalise all the regulations and standards applied to new housing.

However, the proposal for a costed menu as originally conceived was rejected due to a lack of support. The Local Housing Delivery Group and its Standards Working Group was set up to explore in more detail the potential for harmonisation, simplification and improvement of standards in England.

More specifically, the remit of the Standards Working Group was:

“To identify the most common standards applied locally on housing developments and to recommend ways to harmonise, simplify and improve these standards while ensuring development is viable, sustainable, of high standards, and the consumer is protected.”

At the request of Sir John Harman, NHBC took on the role of secretariat and invited experienced individuals from a wide range of backgrounds within the house-building industry to form the Standards Working Group. We began our work on 16 September 2011 and met on five occasions, one of which involved an industry workshop with wider participation. In addition two Sub-Group meetings were convened to look at some specific issues in greater detail.

This report summarises the discussions of the Standards Working Group and outlines its recommendations.

The 10 most common standards

The Standards Working Group's first task was to establish which standards it would need to consider.

Members arranged informal surveys among their own organisations. Some of the standards identified are nationally developed and others were developed to meet specific local needs but have become widespread in their use. The 10 most common standards that are widely used at a local level to set requirements that are additional to the Building Regulations were identified as

- Code for Sustainable Homes
- HCA Design Quality Standards and Housing Quality Indicators
- Lifetime Homes and other accessibility requirements (for affordable housing)
- Building for Life (not intended for use as a standard, but now widely used as such)
- Secured by Design
- Energy/CO₂/renewables target ('Merton Rule', etc)
- Public open space requirements
- Space standards
- Car parking standards
- London Housing Design Guide

Wherever possible, summary information was obtained from the organisations which own or operate all these standards so we could understand, from their perspective, the rationale behind them and the justification for their purpose and use.

Initial review findings

All members of the Standards Working Group agreed that complying with these standards individually – and more so in combination – presents a significant challenge for the house-building industry.

Achieving compliance with combinations of standards can be complicated and costly.

This is because:

- Some of these standards require compliance with others; for example, the Code for Sustainable Homes calls up both Lifetime Homes and Secured by Design.
- Some requirements within individual standards can conflict with others (for example, balancing the requirements of Part L of the Building Regulations with a Merton Rule type requirement), which adds cost and increases complexity.

It can be difficult for professionals working in the design of homes, whether for architectural firms, housebuilders or housing associations, to achieve an understanding of the wide range of standards and how they fit together.

Additional complications also arise because of the way in which some standards are varied from location to location and because of inconsistency in their application and/or interpretation by a particular authority, such as the local planning authority or the local police.

It became apparent from the submissions made by the standards' owners that they have often been developed for good reasons in response to specific needs or concerns. However some did appear to us to have been created in isolation and without regard to other initiatives. There is criticism of the way in which some standards have been developed, operated and maintained, and the way in which the same requirements may need to be 'ticked off' more than once to satisfy multiple standards.

Some of our group's members, as well as other organisations, have already identified the extent of overlap and have conducted reviews of existing standards to establish whether there is scope overall for re-ordering and rationalisation.

Notting Hill Housing Association provided us with a comprehensive analysis showing the complexity and repetitive nature of the current array of standards they have to consider when developing new homes.

We also considered the work published in 2010 by the Commission for Architecture and the Built Environment on the role for standards¹ which illustrated the confusion and overlap of standards widely used in housing development.

Levitt Bernstein also provided us with a copy of its 'Easi-Guide to Good Housing Practice' which suggested how design standards could be simplified.

More recently The Housing Forum published its recommendations for rationalising regulations to support growth and innovation² which also identified the overlaps and complexities in what it called the 'bureaucracies of compliance'. Recommendations were also provided for simplification of the existing arrangements.

¹ *Improving the Design of New Housing, What role for Standards?* CABE 2010

² *Rationalising regulations for growth and innovation* The Housing Forum 2012

Comparing these existing reviews also reveals a good degree of consistency. In general they recommend:

- Doing away with some standards, either in full or in part.
- Merging some of the remaining existing standards to create a smaller number in total.
- Moving some existing standards or some of their technical requirements into Building Regulations – this has the advantage that the requirements apply to all new homes, rather than a select few, but would require a regulatory impact assessment to be satisfied.
- Being clear that some local standards are genuine planning matters, which should enable better account to be taken of local circumstances.

These reviews provided valuable information for us to consider, but did not provide an instant solution to the challenge in hand. In particular we noted that not every standard can be dealt with neatly through such a process.

Costs of complying with standards applied locally

There appears to be very limited information published to date on the costs to developers of complying with the various standards applied locally.

That may be because the costs vary widely depending on the type, scale, size and location of housing developments, because the standards are applied at different levels, and because they are applied in different combinations in different locations.

The time constraints within which we were working limited our ability to conduct detailed research into the costs of complying with the various standards. However, the organisations which own/operate the standards were invited to submit information relating to the costs of implementation. This information was provided to two groups of local planning officers as part of the viability work of the Local Housing Delivery Group.

Their general view was that advice on costs of standards would be useful in principle, should be readily available to all and clearly signposted. In its absence, local authorities are dependent on figures put forward by their consultants.

However, there was doubt about whether currently published cost information covered the particular circumstances for a given site – for example, a strategic site of larger size than the ones considered in the cost analysis. Also, it has been suggested that some of the costs of complying with a standard can reduce when it is widely adopted. An example would be the medium-term economies of scale that may be obtained through a general shift to the use of different standardised components (such as wider staircases).

Standards owners/operators suggest that costs can be mitigated to some extent by good design and consideration at an early stage.

Although this may be the case for some standards, site constraints and other factors may limit these opportunities. Clearly there would be a high cost if application of the standard has the effect of reducing the number of homes that can be built on a particular piece of land, for example because they led to the increased size or footprint of a home. Conversely, as noted in the companion report on viability, 'lower' local standards may result in more viable development, but may increase the risk of development being unacceptable in terms of securing the sustainable objectives of the Local Plan.

Also standards owners/operators may not take account of the interaction of their standards with other standards. We noted that the costs associated with these standards are generally cumulative, although there may be instances where applying one standard will help reduce the cost of complying with another.

Some standards attract other costs such as assessment fees, fees for consultants' advice and staff training. Developers state that these factors give rise to a substantial burden to the industry, although they regard these costs as largely hidden.

It is a fact that many of the standards have come into being in more buoyant economic times when their costs could more easily be absorbed than in the current economic downturn.

We acknowledged the need for benefits to be taken into account alongside the assessment of costs, value for money and long-term cost-effectiveness.

Such benefits could range from a higher selling price to a reduced call on NHS and Social Services resources and mitigation of adverse effects on biodiversity. It was noted that there are established methodologies for cost-benefit analysis that should be used to ensure appropriate rigour.

We noted the National Planning Policy Framework encourages local authorities to plan for the delivery of a wide choice of high quality homes and sustainable communities (NPPF, para 50). It advises that in doing so, development plans should be based on evidence of local needs and demands.

The companion report on viability recognises that planning authorities will often need to strike a balance between policy requirements, including standards, which are necessary for sustainable development and the realities of economic viability.

The notions of balance and risk are also recognised in the NPPF, which states that the cumulative impact of standards and policies should not put the implementation of the plan at serious risk (NPPF, para 174).

Developer members of the Standards Working Group are firmly of the opinion that unless standards applied locally result in higher selling prices, the additional initial cost will need to be borne by the developer and therefore local planning authorities should carefully consider priorities if viability is to be achieved.

What do good standards look like?

Although the initial review did not identify a ready-made solution to the problems of overlapping standards, we agreed that there is scope for considerable improvement.

So against the background of criticism of existing standards, we set about defining 'what good looks like'.

The following list represents the key attributes of credible standards established by the Standards Working Group:

1. The need for the standard to exist must be clear and supported by robust evidence.
2. The standard should deliver value for money, ie. longer term costs should be proportionate to benefits (the assessment of which should include the consideration of all issues such as economic, social and environmental issues, as well as the consequences of not having a standard³). However, there was a view that unless there is a selling price benefit, only the immediate capital cost impact is relevant since it is the immediate cost that impacts on the viability of development.
3. The standard should be aimed at achieving clear outcomes.
4. It should not conflict with or duplicate other standards.
5. The standard should be clear and easy to use.
6. Careful consideration should be given to setting the minimum level at which the standard should apply.
7. It should be easy to measure/quantify (this will assist in minimising subjectivity).
8. It is essential that a broad range of interests and organisations involved should have confidence in the standard.
9. Where an accreditation process is required, it is important that this be cost effective, proportionate and delivers benefit.

Recognising the criticism of the ways in which existing standards have been developed and are operated and maintained, we concluded that good governance is key to successful implementation of any new arrangements.

Critically, proper arrangements need to be in place so that the detailed content of individual standards can be set correctly at the outset and their effectiveness in use can be monitored.

³ Treasury supplement to the Green Book – accounting for environmental impacts http://www.hm-treasury.gov.uk/d/accounting_environmental_impacts.pdf (2012) provides guidance

Testing the concept

Having established that there is, in principle, scope for existing standards to be harmonised, simplified and improved, we tested the concept against a number of current standards.

The four topic areas of accessibility, energy, water and security were selected for review as they were considered to be reasonably typical among the range of current standards, and we expected they would probably allow the development of relevant, broad conclusions.

We agreed that considerable improvement could be achieved in each of the topic areas with the potential to bring efficiency benefits to the industry while maintaining good standards for new homes. It is reasonable to assume that if similar reviews of other topic areas were conducted there would be similarly positive outcomes.

1. Accessibility

The principal standards that currently apply in this topic area in England are Part M of the Building Regulations, Lifetime Homes and a variety of wheelchair guidance/standards.

The present Lifetime Homes Standard was considered by many to be cumbersome and inflexible, which partly explained why it was not widely embraced by developers on a voluntary basis.

Promoted by the Lifetime Homes Foundation, the Lifetime Homes Standard (LTH) seeks to provide design solutions in general needs housing that can meet the changing needs of a wide range of households. The standard includes a number of criteria for:

- Parking and the approach to dwellings
- Entrances, including door width, level access and illumination
- Communal lifts and stairs
- Internal doorways, hallways and circulation space
- Entrance level living space, potential for bed-space, WC and shower drainage
- Grab rails, hoists, stair lifts and through-the-floor lifts
- Accessible bathrooms
- Glazing and window handle heights
- Location of service controls

The logic of some LTH requirements has been questioned. For example, the applicability of accessibility requirements within homes on upper floors of apartment blocks where a lift is not provided.

Similarly, the prevailing wheelchair standards are often criticised as being too prescriptive and failing to take account of the broad range of disabilities that need to be accommodated.

Our conclusions were as follows:

1. There was general support for a three-tier accessibility standard, with:
 - A basic mandatory standard of Part M (revised as appropriate).
 - An intermediate standard.
 - A ‘wheelchair’ standard.
2. It was also believed that there could be scope for the basic and intermediate standard tiers to be merged into a single standard laying somewhere between the two.
3. There may be scope for homes built to these higher standards to be labelled and marketed as such (potentially at a premium in certain cases) and for local authorities to maintain a register of such homes to track provision.
4. It could be appropriate for local authorities to set quotas for each tier on each development based on local evidence and subject to viability testing.
5. The technical details for these standards would need to be developed further by an expert group.

2. Energy

The principal standards that apply in this topic area in England include Part L of the Building Regulations, the Code for Sustainable Homes and Merton type rules.

The Merton Rule was the first local planning policy to set a requirement on renewable energy for certain types of new development. It was named after the London borough that established it in 2003.

The rule required any new residential development of more than 10 units, or any commercial building over 1,000 square metres, to generate at least 10% of its energy needs from on-site renewable energy equipment in order to reduce its reliance on the National Grid and to reduce its CO₂ emissions. Compliance with the policy was required as a condition of planning consent.

About half of the UK’s local authorities introduced a Merton-type rule. It also became part of national planning guidance through PPS 22.

However, the variations on the Rule have now become confusing:

- Sometimes the targets are expressed as a percentage of energy generated (measured in kW hours).
- Sometimes the targets are around a decrease in CO₂ instead (measured in tonnes of CO₂e). Some local planning authorities “expect” a developer to achieve a 10% reduction through use of micro-renewables, others “require” 20% reductions or more.
- There are frequently different thresholds for when the policy is required – often 1,000 square metres or 10 units, but sometimes no threshold.
- About half of all planning authorities have no policy on this issue at all.

Although there may well be merit in providing facilities such as drying space, cycle storage and home office space in new homes, many considered it inappropriate

for these to be encouraged through an energy/CO₂ requirement of the Code for Sustainable Homes.

It was also noted that good data is not available on the extent to which these facilities are being provided. More importantly, it is not clear whether these facilities are actually delivering reduced energy use.

The Code for Sustainable Homes (the Code) is an environmental assessment method for rating and certifying the performance of new homes.

The Code covers nine categories of sustainable design:

- Energy and CO₂ Emissions
- Water
- Materials
- Surface Water Run-off
- Waste
- Pollution
- Health and Well-being
- Management
- Ecology

Each category includes a number of environmental issues, each of which can be assessed against a performance target and awarded one or more credits. Performance targets are more demanding than the minimum standard needed to satisfy Building Regulations or other legislation and intended to represent good or best practice.

In addition to meeting mandatory standards, achievement of the requirements in each design category scores a number of percentage points. This establishes the Code level or rating for the dwelling on a six star scale.

The Code has been criticised on a number of counts. For example it has confusing, inflexible and version specific links to external assessment tools and design standards such as SAP, Lifetime Homes and Secured by Design.

The universal application of an excessively detailed standard for bicycle storage within the energy category of the Code does not take account of local circumstances (such as road safety or the availability of public transport options). Also, the need to provide a certain number of spaces per flat is giving rise to large bicycle stores that are often little used. Many people believe that improving design and access statements in the area of bicycle storage may lead to better outcomes.

Members of the Standards Working Group were critical of the rigid nature of present requirements in these areas.

Our conclusions were as follows:

1. A process is already in place for further significant improvement in energy efficiency using Part L and within a few years zero carbon will be the mandatory standard.
2. Setting higher standards for energy performance beyond Building Regulations is not always cost effective and specifying types or percentages of renewable energy could lead to perverse outcomes. However, it could be appropriate for

local authorities that have invested (or wanted to invest) in a local renewable energy network to require connection to this, but that should be considered as part of the viability testing.

3. Any higher standards that can be justified and are set by local authorities should be expressed on the common metric, probably CO₂ emissions per square metre, and councils should avoid prescribing the means by which this is achieved (for example, a set percentage of energy supplied by renewables).
4. The seven additional energy/CO₂ issues of the Code that go beyond Part L (energy display devices, drying space, energy labelled white goods, external lighting, cycle storage and home office space) are hard to justify as being likely to deliver significant benefit.
5. Overall, the view of the majority of the members of the Standards Working Group is that, given the above, it appears unnecessary to set any standards beyond Building Regulations, assuming the current proposals to achieve zero carbon homes are maintained.

3. Security

The key standard widely adopted in this topic area in England is Secured by Design, which is split into two distinct issues – layout and design of the development, and physical security.

There was general support for many of the physical security aspects of the standard. We believe that the possibility of extending Building Regulations to include some of the content should be explored.

However, there was little support for the way Secured by Design deals with layout and design. Many felt that it actually conflicts with or even contradicts good spatial design (particularly urban design guidance). Another specific concern is the inconsistency with which it is applied, depending upon the Architectural Liaison Officer involved.

Secured by Design is a police initiative to guide and encourage those engaged within the specification, design and build of new homes to adopt crime prevention measures in new development. It is intended to reduce the opportunity for crime and the fear of crime, creating safer, more secure and sustainable environments.

The layout and design section covers a series of planning issues relating to the layout of roads and footpaths and communal areas and their lighting, dwelling boundaries (gates, fences and planting), the layout and orientation of dwellings and parking etc.

The physical security section is concerned with specifications for external doors and locks for houses and communal and entrance doors for flats. It also covers window security, intruder alarms, bicycle storage and a number of other issues.

The layout and design guidance of Secured by Design has been criticised as sometimes conflicting with good urban spatial design and not being appropriate for every development.

4. Water

The standards currently applying to this topic area in England are Part G of the Building Regulations and the Code for Sustainable Homes.

We accepted that there are some very significant challenges ahead: the population is set to grow significantly in regions already suffering serious water stress and the UK Climates Impact Programme (UKCIP) is predicting less rainfall. Measures are needed in order that water availability does not become a constraint on growth and development.

Water efficient features have been installed in many new homes without reported problems or user issues.

However, rainwater harvesting and grey water recycling are still not generally welcomed by social landlords (some of which have decommissioned systems) or by private owners because of the associated running and maintenance costs and issues.

There have also been concerns regarding the impact of water efficiency on toilet bowl hygiene and the performance of drainage systems. Anecdotal evidence of this problem is supported by the WRc/NHBC Foundation report⁴, which suggests that reducing flush volumes can have an adverse effect on the performance of drainage systems.

New homes make up a small proportion of properties supplied with water. It is essential that sensible water efficiency standards for new homes are therefore combined with investment in the infrastructure supplying existing homes, including installing water meters.

Our conclusions were as follows:

1. While recognising current cross-sector evidence and a Defra monitoring programme⁵, better evidence is needed on the effect of water efficiency measures, particularly what is being achieved in practice with the various technologies.
2. The present requirements of Part G (120 litres per person per day, excluding external water use) are reasonable and there may be some scope for these to be tightened.
3. It is reasonable for water efficiency targets to vary in certain areas depending on the extent of local annual rainfall availability or water stress. Part G could facilitate this approach.
4. It would be inappropriate to set very demanding mandatory standards that can only be achieved with the use of rainwater harvesting and/or grey water recycling systems, although it was realised that some designers would wish to specify these systems. The effects that some systems can have on embodied and operational carbon emissions have been identified through research by the Environment Agency, Energy Saving Trust and the NHBC Foundation⁶.
5. Consideration could be given to adopting an 'allowable solutions' approach – undertaking compensating improvements to adjacent buildings or infrastructure if even higher levels of water efficiency were deemed to be justified in new homes.

⁴ 'Pull the chain, fill the drain' CP 367 - The effect of reduced water usage on sewer solid movement in small pipes. WRc Report No.P7904

⁵ 'Water efficiency project final report (2010) Radian Homes, Environment Agency, and 'Assessment of Water Use in Homes built to CSH Levels 3 and 4' (2012) Kent County Council, Town & Country Housing, South East Water, Veolia Water, Thames Water and Southern Water.

⁶ 'Energy and carbon implications of rainwater harvesting and greywater recycling', Environment Agency 2010

Recommendations and next steps

It is clear from our work that simplification and rationalisation of locally applied standards is possible. This report provides clear examples of where overlap exists and improvements can be made.

The next stages of this work will require more time and resources to review and develop the technical requirements for each standard, after applying the simple criteria for credible standards outlined in this report to test whether the standard should exist.

In the meantime, our conclusions and recommendations are as follows:

1

There is an urgent need for the rationalisation of the large number of standards applying to new house-building as well as the compliance regimes around these standards. We have started the work to demonstrate how this rationalisation can be achieved – this process should be continued. Doing so should not compromise the objective set out in the terms of reference that new homes should be “sustainable, of high standards, and the consumer is protected.”

2

To take this work forward, recognising that we are not the owners of the standards we reviewed and to satisfy one of our own criteria that a broad range of interests involved should have confidence in the standards, we recommend a cross-sector Industry Group is established with agreed terms of reference and an independent Chair. Existing Standards Working Group members have indicated a willingness to continue their participation but representation must be widened to include other relevant interests and to consult further and more formally with the wider industry, including the owners of the existing standards.

3

Financial support (including from Government) will be needed for this work to continue. The Minister should monitor the activity of the Industry Group and endorse its outputs where appropriate.

4

Building on the work begun here and using the criteria for credible standards, the Industry Group should establish priorities and review existing standards in a systematic manner, taking a thematic approach to the work. We recommend the approach of using sub-groups (supported where necessary by more specialist expertise) to develop the detailed requirements for each topic and theme under the general guidance of the Industry Group.

5

The Industry Group may need to remain in place in the long term to monitor the effectiveness of the standards in use and to undertake periodic reviews, taking into account all relevant changes in circumstances and/or changes to other associated standards. A first task in this process will be to produce a clear roadmap setting out the stages of the work, including the consultation process and expected completion dates.

6

An early task for the Industry Group will also be to consider whether interim and transitional arrangements are required while it carries out its deliberations.

7

Ultimately, there must be clear and simple advice available to all parties setting out the benefits, issues and implications associated with each standard, including cost implications. Such advice would be helpful and directly relevant to the Local Plan process. It is vital that appropriate planning advice is developed showing how the costs and burdens of compliance can be reduced, while ensuring rigour in the implementation of those standards that are adopted. An agreed approach will need to be used to establish the costs and benefits of proposals, including full consideration of any assessment and certification procedures.

Appendix A

Costs of complying with standards applied locally

The Standards Working Group is aware of the following sources of published information on the costs of complying with standards applied locally.

Code for Sustainable Homes

Department for Communities and Local Government, 2011.

'Cost of building to the Code for Sustainable Homes' - updated cost review.

<http://www.communities.gov.uk/publications/planningandbuilding/codeupdatedcostreview>

Knight Frank, 2010.

'Zero carbon, sustainability and the house-building sector':

<http://www.knightfrank.co.uk/commercial/sustainability-consultancy/documents/Green-Homes-2010.pdf>

Housing Forum, EC Harris, PRP Architects, 2010.

'Viability Impacts of Core Standards, Housing Quality Indicators and Design Quality Standards'

Homes and Communities Agency, 2010.

Design and sustainability standards consultation (housing) - evidence base and supporting information

<http://webarchive.nationalarchives.gov.uk/20100514162524/http://www.homesandcommunities.co.uk/supporting-information>

Lifetime Homes and other accessibility requirements

Homes and Communities Agency, 2010.

'Design for Manufacture – Lessons Learnt 2'

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