

# Housing Standards Review Consultation - Response Form

## How to respond:

Please respond by email to: [HousingStandardsReview@communities.gsi.gov.uk](mailto:HousingStandardsReview@communities.gsi.gov.uk).

Postal responses can be sent to:

Simon Brown  
Code for Sustainable Homes & Local Housing Standards  
Department of Communities & Local Government  
5 G/10, Eland House,  
Bressenden Place,  
London, SW1E 5DU

The closing date for responses is 5pm on 22 October 2013.

## About you:

First Name:	Steve
Last Name:	Hudson
Position:	Design Access and Disability Equality Consultant
Name of organisation (if applicable):	Gateshead Access Panel
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(i) **Are the views expressed on this consultation an official response from the organisation you represent or your own personal views?**

Organisational response



Personal views

**(ii) Are the views expressed on this consultation in connection with your membership or support of any group? If yes please state name of group:**

Yes

No

Name of group:

**Gateshead Council's DESUIF**

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

<b>Builders / Developers:</b>		<b>Property Management:</b>	
Builder – Main contractor	<input type="checkbox"/>	Housing association (registered social landlord)	<input type="checkbox"/>
Builder – Small builder (extensions/repairs/maintenance, etc)	<input type="checkbox"/>	Residential landlord, private sector	<input type="checkbox"/>
Installer / specialist sub-contractor	<input type="checkbox"/>	Commercial	<input type="checkbox"/>
Commercial developer	<input type="checkbox"/>	Public sector	<input type="checkbox"/>
House builder	<input type="checkbox"/>	<b>Building Control Bodies:</b>	
<b>Building Occupier:</b>		Local authority – building control	<input type="checkbox"/>
Homeowner	<input type="checkbox"/>	Approved Inspector	<input type="checkbox"/>
Tenant (residential)	<input type="checkbox"/>	<b>Specific Interest:</b>	
Commercial building	<input type="checkbox"/>	Competent Person Scheme operator	<input type="checkbox"/>
<b>Designers / Engineers / Surveyors:</b>		National representative or trade body	<input type="checkbox"/>
Architect	<input type="checkbox"/>	Professional body or institution	<input type="checkbox"/>
Civil / Structural Engineer	<input type="checkbox"/>	Research / academic organisation	<input type="checkbox"/>
Building Services Engineer	<input type="checkbox"/>	<b>Energy Sector</b>	<input type="checkbox"/>
Surveyor	<input type="checkbox"/>	<b>Fire and Rescue Authority</b>	<input type="checkbox"/>
<b>Manufacturer / Supply Chain</b>	<input type="checkbox"/>	<b>Other</b> (please specify)	<input checked="" type="checkbox"/>
		Gateshead Council's "Disability Equality Service User Involvement Forum" (DESUIF) was established in January 2009 as part of the Council's response to their disability equality duty, to support the involvement of disabled people and carers in Gateshead, by providing a forum for review and discussion of issues relating to disability equality and inclusive design that impact on Development and Enterprise	

	<p>projects and procedures. Gateshead Access Panel facilitates the forum as part of our partnership working with Gateshead Council and the Gateshead Strategic Partnership (GSP) with membership including various service user groups and links to other GSP member organisations.</p>	
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**(iv) Please tick the *one* box which best describes the size of your or your organisation's business?**

Micro – typically 0 to 9 full-time or equivalent employees (incl. sole traders)

Small – typically 10 to 49 full-time or equivalent employees

Medium – typically 50 to 249 full-time or equivalent employees

Large – typically 250+ full-time or equivalent employees

None of the above (please specify) Gateshead Access Panel (GAP) is a recognised service user led organisation (ULO) currently with 3 full-time and 1 part-time employees 6 regular volunteers and around 40 other volunteers who can provide ad hoc support. Our wider membership and activities includes and supports disabled service users and carers across Gateshead and the north east region. Through our partnership working within Gateshead Council's DESUIF involving representatives for other disability and voluntary sector organisations, officers of the Council and other public bodies, we are able to network, involve and consult with a broad group of individuals and representatives on issues affecting accessibility and inclusion; as well as providing feedback to inform impact assessments of proposed policies, strategies or developments. Such feedback is backed by our technical knowledge, professional training and experience and is supported by our working closely with and to support disabled people, carers and our working with other professionals. As the DESUIF's Technical Consultant I have been asked to respond to this consultation on behalf of both GAP and DESUIF on the basis of local knowledge and experience from working with DESUIF and GAP members and supporting disabled people to obtain adaptations to their council, private landlord, housing association, or owner occupier homes.

**(v) Would you be happy for us to contact you again in relation to this consultation?**

Yes

No

DCLG will process any personal information that you provide us with in accordance with the data protection principles in the Data Protection Act 1998. In particular, we shall protect all responses containing personal information by means of all appropriate technical security measures and ensure that they are only accessible to those with an operational need to see them. You should, however, be aware that as a public body, the Department is subject to the requirements of the Freedom of Information Act 2000, and may receive requests for all responses to this consultation. If such requests are received we shall take all steps to anonymise responses that we disclose, by stripping them of the specifically personal data - name and e-mail address - you supply in responding to this consultation. If, however, you consider that any of the responses that you provide to this survey would be likely to identify you irrespective of the removal of your overt personal data, then we should be grateful if you would indicate that, and the likely reasons, in your response, for example in the comments box.

# Questions:

**Please note:** We very much welcome your views to help inform our decision on the way forward on standards. However, you are not obliged to answer every question. You can focus only on the sections that are most relevant to you.

## Introduction

<b>Q1</b>	Which of the options (A, B, or C) set out above do you prefer? Please provide reasons for your answers.
A <input type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/>	
Comments: <p>Although views on the proposed strategic options tend to vary, the preference is for option C. However, there are concern over issues including:</p> <ul style="list-style-type: none"><li>· effectiveness of a national standard;</li><li>· time needed for further consultation on suitable standards;</li><li>· effectiveness of future monitoring;</li><li>· application of viability testing to accessibility of homes;</li><li>· equality and access should negate financial viability;</li><li>· time required to achieve improved standards and regulation and</li><li>· potential for either delay in regulation or regulating earlier to inadequate standards.</li></ul>	

<b>Q2</b>	Do you agree that there should be a group to keep the nationally described standards under review? Y/N.
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	

Comments:

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

Please provide reasons for you answer.

YES  NO

Comments:

So as not to limit choice and availability for disabled and elderly people. Standards should be consistent across tenure.

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

Comments:

Whilst we are unable to provide feedback on estimates, we wish to highlight the following issues for consideration in the final impact assessment:

- The impact of not providing accessible homes in relation to health and well-being.
- The cost of providing care without sufficient space and access to accommodate user needs and assistance from carers.
- The increased risk to vulnerable persons from care being delivered in inadequate home environments, i.e. spaces too small to accommodate equipment needs.
- The increased risk to the care provider from care being delivered in inadequate home environments, i.e. spaces too small to accommodate

support needs.

- The higher cost to adapt unsuitable homes compared to homes designed to higher accessibility and to appropriate space standards.
- The potential to reduce need for care in accessible homes; and
- The cost of residential care compared to continuing to live in your home.
- The potential cost of increased demand for Disabled Facilities Grants without sufficiently accessible properties.

## Accessibility – General questions

<b>Q5</b>	Do you agree that minimum requirements for accessibility should be maintained in Building Regulations? Y/N.
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
<p>Comments:</p> <p>Our members and colleagues wish to see higher standards of accessibility maintained as a minimum requirement within Building Regulations.</p> <p>We also wish to have involvement in determining and agreeing these standards for housing, with more time to consider the details of the standards for accessibility and social inclusion and related space standards.</p> <p>Members welcome the aim of having improved national standards, but are also concerned if this also leads to additional constraints on the ability of local plans and developments to meet locally identified needs.</p>	

<b>Q6</b>	<p>a) Is up-front investment in accessibility the most appropriate way to address housing needs, Y/N.</p> <p>if Yes,</p> <p>b) Should requirements for higher levels of accessibility be set in proportion to local need through local planning policy? Y/N.</p>
A <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
B <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
<p>Comments:</p> <p>a) We agree that up-front investment in accessibility is the most appropriate way to address housing needs. to provide for basic accessibility for disabled people and our ageing population, whilst also providing an improved standard for the housing market and people more generally.</p>	

b) We agree that requirements for higher levels of accessibility be set in proportion to local need through local planning policy.

However, as there are concerns over lack of adequate data for local, regional or national decisions on proportions of homes requiring high levels of accessibility, we believe there is also a need to set minimum proportions above which a higher standard can be justified according to available knowledge of local need.

<b>Q7</b>	Do you agree in principle with the working group’s proposal to develop a national set of accessibility standards consisting of a national regulatory baseline, and optional higher standards consisting of an intermediate and wheelchair accessible standard? Y/N.
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YES  NO

Comments:

We agree in principle with the proposal to develop a national set of accessibility standards with a regulatory baseline standard for all new housing. However, we do not agree with the proposal for an intermediate and wheelchair accessible standard, where such standards are not enforced by regulation.

Our preference is to see the minimum standards raised to include many of the features currently prescribed in the Lifetime Homes Standard to provide the baseline minimum standard for new homes, and to regulate for housing developments to include a minimum number of homes to a higher standard to provide “wheelchair adaptable” homes.

A requirement for a minimum provision of “wheelchair adaptable” homes could be achieved similarly to how the current Building Regulations Part M for “buildings other than dwellings” requires “at least one wheelchair-accessible bedroom is provided for every 20 bedrooms, or part thereof ” in a new hotel; the regulated bedroom or bedrooms having to be designed to satisfy an accessible wheelchair guest size with specified accessible facilities and features equivalent to other bedrooms and offering a choice

of location.

**Q8** Do you agree with the costs and assumptions set out in the accompanying impact assessment? Specifically we would like your views on the following:

a) Do you agree with the estimated unit costs of Life Time Homes? Y/N If not we would appreciate feedback as to what you believe the unit cost of complying with Life Time Homes is.

b) Do you consider our estimates for the number of homes which incorporate Life Time Homes to be accurate? Y/N If respondents do not consider our estimate is reasonable we would appreciate feedback indicating how many authorities you believe are requiring Life Time Homes standards.

**Wheelchair Housing Design Guide/standards:**

c) Do you agree with the figures and assumptions made to derive the extra over cost of incorporating Wheelchair Housing Design Guide? Y/N If not we would welcome feedback along with evidence so that we can factor this into our final analysis.

d) Do you have evidence of requirements for and the costs other wheelchair standards which we have not estimated? Y/N We would appreciate the estimated costs of complying with the standard and how it impacts properties.

e) Do you consider our estimates for the number of homes which incorporate wheelchair standards to be accurate (in the “do nothing” and “option 2” alternatives). Y/N. If you do not consider the estimate to be reasonable, please could you indicate how many authorities you believe require wheelchair standards.

A) YES  NO

**Comments:**

We are unable to comment on the assumed costings set out in the accompanying impact assessment.

However, the assessment appears to be mainly construction cost based and without consideration of peoples needs or quality of life:

The impact assessment should include the potential difference that accessible homes can make to the occupiers through: improved health and well-being and reduced social care costs; reduced need for DFG funding; improved potential for independent living and access to employment; increased potential for housing mobility when a change of size or housing type is required due to changes in family size, ageing, or other changing circumstances such as lower incomes in retirement; or desire/need to change location.

We also believe some recognition should be given to the potential savings in the process from design development through to construction, with architects, consultants and contractors becoming more familiar with fixed national standards, standard design detail and solutions, saving time to design, review and construct.

The impact assessments should on the other hand also consider the costs incurred over the long term occupancy of homes that are not adequately accessible, including such as increased need for adaptations, or future moves to more accessible/adaptable accommodation, and reduced health and wellbeing resulting from unmet needs compounded by accessibility, structural and space limitations.

B) YES  NO

Comments:

We are unable to comment on the estimated cost of Lifetime Homes.

However, we believe all local authorities will require homes meeting Lifetime Homes standards.

C) YES  NO

Comments:

We are unable to comment on the figures used to derive the extra over cost of incorporating the Wheelchair Housing Design Guide.

However, we believe the assumptions used do not adequately reflect the impact of providing homes that meet the needs of wheelchair users, including the potential longer term cost savings through: improved health and well-being and reduced social care costs; savings in comparison between “at home care” versus residential care; reduced need for DFG funding for occupant specific adaptations; improved potential for independent living and access to employment; increased potential to minimise risk for “at home care” within “care ready”/supportive environments; increased potential for housing mobility when a change of size or housing type is required due to changes in family size, ageing, or other changing circumstances such

as lower incomes in retirement; or desire/need to change location.
D) YES <input type="checkbox"/> NO <input type="checkbox"/>
Comments:
E) YES <input type="checkbox"/> NO <input type="checkbox"/>
Comments: We are unable to comment on the estimates for the number of homes which incorporate wheelchair standards. However, we believe that all local authorities require wheelchair housing standards.

<b>Q9</b>	Do you believe that the estimated extra over costs in the Impact Assessment reflect the likely additional cost of each level? Y/N
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments: We are unable to comment on the estimated extra over cost in the Impact Assessment. However, we believe the impact assessment does not consider such as:	
<ul style="list-style-type: none"> <li>· Equality Impact</li> <li>· Cost of increased need for DFGs of “do nothing” option</li> <li>· Cost of residential care v accessible homes not incorporated</li> <li>· Familiarity with process and standards would result in less time for design and review and increased potential for compliance with what should become common standards and solutions, and therefore lower unit costs per dwelling.</li> <li>· The additional costs of not making a home accessible, e.g. unnecessary house moves, health and wellbeing costs</li> </ul>	

<b>Q10</b>	<p>Do you agree that level 3 properties should be capped in order to ensure local viability calculations remain balanced? Y/N</p> <p>If yes, at what level should the cap be set?</p>
<p>YES <input type="checkbox"/> NO <input checked="" type="checkbox"/></p>	
<p>Comments:</p> <p>We do not not agree that level 3 properties should be capped in order to ensure local viability calculations remain balanced.</p> <p>We generally believe that accessible housing needs should be judged on the basis of identified local needs and not by financial viability, which would otherwise appear prejudicial on equality grounds and disability rights.</p> <p>We believe local authorities should have flexibility in what level of provision in terms of the number of wheelchair accessible/adaptable homes are developed where within their town, village or ward boundaries, so as to be responsive to local needs and the availability of locally accessible services, transport and infrastructure, etc.</p> <p>We are concerned that fewer level two and three dwellings will be built on the basis of cost and the inability to forecast future demand if financial viability and data requirements to substantiate need are given priority when agreeing the authorities local plan.</p> <p>The demand for wheelchair homes can vary quite markedly between different wards and neighbourhoods or villages, and where there may not have been much public investment in new homes in the past, or where there is little provision in the same local or social services authority area. The implications for the numbers of wheelchair homes that are required to be built may be higher in some localities of a town or borough, such as where there has been little new public investment in homes in the past, or where there is little private sector home building in prospect.</p> <p>We also believe that in light of the public sector duty applicable to government departments and to Local Authorities, it may appear unlawful under the Equality Act 2010 to cap off a known different need arising from</p>	

disability in relation to a local statutory planning responsibility.

Another issue we consider to be relevant is that disabled people should have freedom of choice of housing to meet their needs within different tenure types and geographic locations. Without this freedom, and general provision of Level 3/wheelchair adaptable housing, there is a risk of restricting choice and mobility as well as increased potential to create “vulnerable resident ghettos” through the grouping of disabled residents into certain areas making them potentially more vulnerable to crime.

**Q11** If a cap were to be adopted should it, in principle;

a) Vary across tenure?

b) Be flat across tenure?

A  B

Comments:

If a cap were to be adopted, we believe it should be flat across tenure and based on local identified needs.

Local authorities should be free to respond to their knowledge of local needs which they should be required to identify, and able to apply flexibility in regard to location of the development and tenure when deciding on the required provision of wheelchair accessible / adaptable homes, such that any declared requirement to provide a percentage of homes meeting this standard can be adjusted according to the appropriateness of the location for accessibility to local services and infrastructure, etc.

Local authorities should be expected to achieve their planned percentage target over a set time period related to the local plan and its requirement for review and update. This may require the percentage to vary over the life of the local plan, which should in any case be expected when responding to local needs. To avoid concern that a local authority could default on the agreed percentage of wheelchair accessible/adaptable homes there could be a minimum level of provision which the specific authority / any local authority would be required to achieve during an agreed timescale.

Local plans need to also respond to the population becoming more mobile as a result of migration from other parts of the country or beyond, as well as aiming to minimise the need for extended mobility between the housing locations and essential facilities, services and infrastructure; which further suggests a need for flexibility in local plans in relation to what percentage of home types and tenures are developed where, which should in any case be accommodated within the agreed local plan.

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

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

A  B  C

Comments:

We “Fully Support” integration of all three levels of the working group’s proposed access standard into Building Regulations with higher levels being ‘regulated options’.

We generally support an enhanced minimum standard above the current ADM, and favouring a 2 tier approach as proposed by the Challenge Panel with the regulated baseline standard enhanced to include features from the Lifetime Homes Standard, and a higher level provision to facilitate a higher potential to adequately accommodate immediate occupation by wheelchair users with less need for costly adaptations.

## Accessibility – Technical questions

<b>QA1.1</b>	<p>Would you support the proposed changes to these aspects of guidance? Y/N.</p> <p>In your view, would introducing these requirements increase cost over and above that within the current AD M of the Building Regulations- please provide reasons for your answer.</p>
<p>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>QA1.2</b>	<p>Would you support the inclusion of guidance non car parking for all dwellings as set out in the consultation standard? Y/N.</p> <p>In your view, would introducing these requirements increase cost to industry - please provide reasons for your answer.</p>
<p>YES <input checked="" type="checkbox"/> NO <input type="checkbox"/></p>	
<p>Comments:</p> <p>We are concerned that with no regulatory requirement to provide parking spaces to accommodate and no national standard for Wheelchair Accessible Vehicle (WAV) parking WAVs that can be referenced, the Council are not finding it easy to get local adoption within the housing developments or within on-street parking provisions.</p> <p>3.6_L3 proposes parking areas providing a minimum headroom of 2.2m, which may be adequate for many people accessing hatchback type vehicles or the smaller range of Wheelchair Accessible Vehicles (WAVs) accommodating passengers boarding and alighting in their wheelchair. 2.6m height clearance is recommended for public car parks in BS8300 and for some Level 3 wheelchair accessible/adaptable homes there will be the need to accommodate the height of many larger wheelchair adapted vehicles (WAVs) in garages or car ports. This is particularly an issue for wheelchair users who drive themselves but also need to enter their vehicle in their wheelchair, lock their wheelchair into a fixed floor location anchor,</p>	

and then transfer in an upright position (i.e. weight bearing on their legs as they pivot or lift themselves across) onto the drivers seat, which they then rotate to the driving position. Such transfers require the adaption of larger and taller vehicles than those more often used by wheelchair passengers. These larger vehicles can be close to 4.8m length (i.e. too long to readily park within the lines in standard length parking bays of 2.4m x 4.8m (which can result in their being ticketed and fined) as well as the height of these vehicles being close to 2.5m. This is why in our region we have been working with Gateshead Access Panel's members and Gateshead Council to improve provision and standards for WAV parking in public car parks.

In regard to housing standards, for WAV users it is important to have adequate space for boarding and alighting their vehicle on a level area, and preferably with covered access. Without surfaces that are sufficiently level and extending enough to accommodate the vehicle length (or width for side access vehicles) plus the length of the ramp or lifting platform and the space to manoeuvre on and off the ramp/platform, such transfers cannot be achieved safely, and in some cases the lifting platforms will not deploy or provide contact with the ground. Based on the research reported in BS8300 and our own local research we advise an additional allowance of at least 3m, preferably 3.5m beyond the length and width of a standard 4.8 x 2.4m bay for public car parks, i.e. a space 8m length x 6m width can potentially accommodate both side access and rear access WAVs. For wheelchair accessible housing, we advise consideration when locating the dwelling to consider the potential to provide adequate space to facilitate easy extension of the standard driveway/footpath provision for WAV users where the end occupier is not known.

Similarly, the potential occupation by WAV users should be considered in relation to the provision of any garage or carport facility; and although the latter is more easily achievable, the potential to provide a larger covered area requires consideration to avoid any structural constraints or to minimise any adaptations later.

Consideration should also be given to the width and length of driveways (with or without covered access) and garaging of vehicles by elderly or disabled couples who can both experience mobility impairments and need access at both sides and around their vehicle to accommodate their mobility needs for getting in and out of the vehicle with doors fully open both sides, to accommodate their mobility aids (i.e. walking frame/stroller, wheelchair, or mobility scooter); a need which is likely to increase with the

increasing proportion of our ageing population.

**QA1.3** Would you support inclusion of requirements for external lighting and covered communal entrances? Y/N.  
In your view, would introducing these requirements increase cost to industry - please provide reasons for your answer.

YES  NO

Comments:

**QA1.4** Do you think that including this guidance for lobbies in all dwellings would be helpful? Y/N.  
Would introducing these requirements increase cost to industry - please provide reasons for your answer.

YES  NO

Comments:

**QA1.5** Do you agree that the lift size set out in the technical standard reflects current industry practice? Y/N.  
Would introducing these requirements increase cost to industry - please provide reasons for your answer.

YES  NO

Comments:

**QA1.6**

Do you agree that it is appropriate to require a minimum width of 850mm in all new homes? Y/N.

Would introducing these requirements increase cost to industry - please provide reasons for your answer.

YES  NO

Comments:

A 900mm wide stair without winders or tapered treads makes it safer and more practical for someone to be helped up and down the stairs and may increase interest in new dwellings by older and disabled people wanting to move home, and prospective buyers and renters with older or disabled relatives.

<b>QA1.7</b>	<p>Do you agree that it is appropriate to amend guidance on hall and landing widths? Y/N.</p> <p>Would introducing these requirements increase cost to industry - please provide reasons for your answer.</p>
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YES  NO

Comments:

We believe the width of doors should be the same across the levels L1, L2 and L3, and corridors the same across L1 and L2, with L3 width corridor increased to accommodate potential widening of the entrance door and/or to accommodate increased manoeuvring space in front of the door for a manual or powered wheelchair user.

We believe that the width of halls and corridors at Level 1 combined with Level 2 should be set at 1050mm, which as the RIBA have noted in recent review of housing design guidance (“A guide for assisted living: Towards Lifeline 21”, 2011) is the dimension which in the present Part M AD for dwellings is given as compatible with the standard 775mm opening internal doors that open off it.

It should also be noted in the text of the Level 1 /Level 2 combined standard that the required 300mm wall nib inside a front door on its leading edge side, requires any hallway to be at least 1200mm wide at this point. This requirement is often misunderstood by designers because it is not stated clearly in the current AD.

<b>QA1.8</b>	<p>Would you support this simplification measure? Y/N.</p> <p>Please give reasons for your answer being clear whether you think that this could add cost to home builders.</p>
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YES  NO

Comments:

<b>QA1.9</b>	<p>Do any other elements of the working group’s suggested technical standard increase requirements above current regulatory minimum? Y/N.</p> <p>Please give reasons for your answer being clear whether you think that this could add cost to home builders and in particular in relation to reworded guidance on the following:</p> <ul style="list-style-type: none"> <li>• Approach routes</li> <li>• External steps</li> <li>• Communal Approach route</li> <li>• Communal entrance doors</li> <li>• Private entrance</li> <li>• Hall and landing widths</li> <li>• Clear access zones and route</li> <li>• Consumer units</li> </ul>
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YES  NO

**Comments:**

We are unable to comment on cost implications, but wish to comment on a number of issues, including:

- Step-free and level access to provide wheelchair accessible thresholds
- Level access drainage grilles in front of external thresholds
- Consumer Unit height to be accesible to wheelchair users
- Standardisation of remote controls or master control units to aid easy aditions to environmental and facility controls in the home
- Incorporation of Telecare, care ready, and access ready home design
- Designing for people with sensory impairments and dementia
- Design and location of door entry and intercom systems

The provision of “step-free access” should be included as the baseline standard and the definition of and design guidance for an accessible

threshold should be revised to provide a wheelchair accessible threshold. The current standards allow for a 15mm upstand that can often be found to include a vertical element that tends to trap the small castors on manual wheelchairs, creating a potential trip hazard for the wheelchair user as well as ambulant disabled people. Similarly a horizontal gap of around 15mm or more within the threshold can also have a similar trapping or tripping effect. A smooth transition is needed similar to that indicated in Annex C Diagram 3, so as to aim for a level access transition. The transition between inside and outside levels is also important for many larger powered wheelchairs, which can actually bottom-out on a threshold even where ramping is provided in an attempt to minimise the threshold transition, which in reality exceeds the 15mm maximum difference between internal and external levels, but for the provision of the ramping to ameliorate this barrier to access.

The provision of “level access drainage grilles” across external entrances (front and rear/side) should also be identified as a required provision for access to homes from the level landings immediately outside the doorway and in front of the threshold, to prevent ingress of water and obviate any need to provide thresholds with upright elements to act as barrier seals. Such provision, in combination with proposals for entrance canopies should minimise any concerns over ingress of water from rain or snow in all but the most exposed sites; and other options for sealing at external thresholds can be found on the market with some research. Such drainage provision linked to gulleys or soakaways should also support current standards for SuDS (Sustainable urban Drainage Systems) compliance for any new housing schemes.

We are concerned that the current centreline height (Ref All Levels 11.1 ) at between 1350-1450mm above floor level for “Consumer Units” in accordance with Building regulations Part P disregards the need for access by wheelchair users living independently or at least without assistance 24 hours a day. With no access to the consumer unit after a power interruption, they are potentially at high risk in many respects. This should be recognised as a safeguarding issue as well as an equality and human rights issue.

Solutions to overcome the prevalence of “remote controls” should be considered: For instance we are currently supporting a disabled couple to obtain adaptations to their wheelchair accessible bungalow. In their lounge they have remote controls for:

- Opening the front door to gain entry;
- Answering the front entrance intercom from the lounge;
- Opening the front door from within the lounge;
- Accessing Care Call;
- Remote to operate the rear patio door from outside.
- TV remote;
- Satelite/media centre remote.

This does not include the remote control each has for their individually adapted WAV, as each have to travel separately due to their large WAV only accommodating one wheelchair user. We need to see further development of “master remote control units” that can be easily taught to include the operation of additional environmental elements and facilities within the home, similar to how many TV remotes can be programmed to operate video/audio players from other manufacturers simply by entering a standard code for that manufacturer. This would help many disabled and elderly people as their needs for environmental control aids gradually increases with the onset of ageing or impairment; although we recognise that some individuals may still require differently sized or shaped controls to aid recognition and use. It is therefore likely that further research is need in respect of this issue, particualrly in regard to how we cater for the needs of an ageing population who are more likenly to struggle with new technology and contriols or be more prone to dementia.

The use of “telecare systems” and provision of “care ready homes” needs to be considered to also include for “access ready homes”(i.e. including for powered and remote operation of doors and intercom facilities).

Housing standards should also include criteria to support design and provisions to support people with “sensory impairments” and “dementia”; issues which we understand are currently being considered in housing standards and Building Regulations for Wales.

We continue to receive complaints from Blind and visually impaired persons and people in wheelchairs and mobility scooters who find difficulty accessing “door entry systems” and “intercoms” at communal entrances or

private entrances to homes or public buildings. This is in spite many years of design progress in the equipment available to satisfy initially DDA and now Equality Act guidance as well as the individual needs of home owners / renters. Our response to this is to point to the lack of any regulated standards and a lack of awareness among those responsible for the provision. Having worked with local authorities, equipment providers, specifiers, and equipment manufacturers and consulted with many disabled and elderly service users, we recognise that the manufacturers are able to provide the equipment required with the accessible physical and audio features needed to meet the needs of most service users, including issues of tonal and colour contrast, tactile elements, logical automated audio responses, remote concierge functions, and suitably sized and visible displays. We have also worked with service providers to identify the most suitable location and positioning of such controls and communication devices. However, without required standards or regulated provision, procurement practices being what they are within different organisations, lack of awareness on behalf of the specifier and/ or of installers generally add up to inadequate provision, as well as increased potential for incompatibility of provision with other telecare or communication aids, and increased cost to service providers, local authorities and in regard to home adaptations, increased charges against the DFG funding that could easily be avoided.

**QA1.10** Are the working group’s proposed performance requirements for level 1 of the standards pitched at the right level?  
 Please indicate which of the options below you agree with.  
 a) they go too far, and should be reduced  
 b) they are about right  
 c) they don’t go far enough

A  B  C

Comments:

<b>QA1.11</b>	If you do not entirely agree (ie your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).
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Comments:

Levels 1 and 2 should be combined together, as sought by the Challenge Panel to provide a 2-tier standard instead of the proposed 3-tier.

Level 1 does not provide step-free access or use, does not require lift access to flats on upper floors, and lacks the adaptability sought in lifetime homes.

<b>QA1.12</b>	Do you agree that it would be beneficial for the structure, definitions, terminology and diagrams common to all three levels to be reflected in an updated version of Approved Document M (Access to and use of buildings) of the Building Regulations? Y/N
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YES  NO

Comments:

Definition and guidance for an “Accessible threshold” should be improved to provide a wheelchair accessible threshold. The current standards allow for a 15mm upstand that can often be found to include a vertical element that tends to trap the small castors on manual wheelchairs, creating a potential trip hazard for the wheelchair user as well as ambulant disabled people. Similarly a horizontal gap of around 15mm or more within the threshold can also have a similar trapping or tripping effect. A smooth transition is needed similar to that indicated in Annex C Diagram 3, so as to aim for a level access transition. The transition between inside and outside levels is also important for many larger powered wheelchairs, which can actually bottom-out on a threshold even where ramping is provided in an attempt to minimise the threshold transition, which in reality exceeds the 15mm maximum difference between internal and external levels, but for the provision of the ramping to ameliorate this barrier to access.

“Clear turning circle” definition does not appear to respond to the research reported in BS8300:2009 Table Annex C Table C.13, which identifies 90% of self-propelled and electrically propelled wheelchair users can turn

through 180 degrees in a turning space 2150mm length x 1600mm width. In addition, there has been current recognition among mobility equipment services suppliers that the physical size of manual and powered wheelchairs have increased in recent years due to advancements in design to meet user needs, providing increased support, stability and safety, increased availability of such wheelchairs, and increasing size of their occupants. We therefore recommend the proposed definition to identify the need to accommodate an ellipse 1700mm wide and length 2200mm length and that any reference to a turning circle be removed, as this can be demonstrated to be used all too often to substantiate accessibility of spaces that in reality do not adequately accommodate ease of access by independent wheelchair users or are inappropriately used to demonstrate access for assisted wheelchair users in and around the home. Alternatively instead of the turning circle, reference can be made to a 1700mm x 2200mm rectangular turning space, which for designers is easier to envisage and sketch (assuming they still use a pencil).

<b>QA1.13</b>	Do you agree that level 2 properties should provide step free access and key facilities at ground level? Y/N.
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>QA1.14</b>	<p>Are the working group's proposed performance requirements for level 2 of the standards pitched at the right level? Please indicate which of the options below you agree with.</p> <p>a) they go too far, and should be reduced  b) they are about right  c) they don't go far enough</p>
A <input type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/>	
Comments:	

<b>QA1.15</b>	If you do not entirely agree, (ie your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).
Comments:	
Levels 1 and 2 should be combined together, as sought by the Challenge Panel to provide a 2-tier standard instead of the proposed 3-tier.	

<b>QA1.16</b>	<p>Are the working group's proposed performance requirements for level 3 of the standards pitched at the right level? Please indicate which of the options below you agree with.</p> <p>a) they go too far, and should be reduced  b) they are about right  c) they don't go far enough</p>
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A <input type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/>	
Comments:	

<b>QA1.17</b>	If you do not entirely agree, (ie your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).
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Comments:	
<p>Ref All Levels 11.1: We are concerned that the current centreline height at between 1350-1450mm above floor level for “Consumer Units” in accordance with Building regulations Part P disregards the need for access by wheelchair users living independently or at least without assistance 24 hours a day. With no access to the consumer unit after a power interruption, they are potentially at high risk in many respects. This should be recognised as a safeguarding issue as well as an equality and human rights issue.</p> <p>Ref 3.3_L3 to 3.6_L3: We are concerned that parking for “Wheelchair Accessible Vehicles” (WAVS) and for access for “elderly or disabled couples” from standard saloon and hatchback vehicles are not currently catered for in the proposed provisions for Car Parking.</p> <p>With no regulatory requirement to provide parking spaces to accommodate and no national standard for Wheelchair Accessible Vehicle (WAV) parking WAVs that can be referenced, the Council are not finding it easy to get local adoption within the housing developments or within on-street parking provisions.</p> <p>3.6_L3 proposes parking areas providing a minimum headroom of 2.2m, which may be adequate for many people accessing hatchback type vehicles or the smaller range of Wheelchair Accessible Vehicles (WAVs) accommodating passengers boarding and alighting in their wheelchair. 2.6m height clearance is recommended for public car parks in BS8300 and for some Level 3 wheelchair accessible/adaptable homes there will be the need to accommodate the height of many larger wheelchair adapted vehicles (WAVs) in garages or car ports. This is particularly an issue for wheelchair users who drive themselves but also need to enter their vehicle</p>	

in their wheelchair, lock their wheelchair into a fixed floor location anchor, and then transfer in an upright position (i.e. weight bearing on their legs as they pivot or lift themselves across) onto the drivers seat, which they then rotate to the driving position. Such transfers require the adaption of larger and taller vehicles than those more often used by wheelchair passengers. These larger vehicles can be close to 4.8m length (i.e. too long to readily park within the lines in standard length parking bays of 2.4m x 4.8m (which can result in their being ticketed and fined) as well as the height of these vehicles being close to 2.5m. This is why in our region we have been working with Gateshead Access Panel's members and Gateshead Council to improve provision and standards for WAV parking in public car parks.

In regard to housing standards, for WAV users it is important to have adequate space for boarding and alighting their vehicle on a level area, and preferably with covered access. Without surfaces that are sufficiently level and extending enough to accommodate the vehicle length (or width for side access vehicles) plus the length of the ramp or lifting platform and the space to manoeuvre on and off the ramp/platform, such transfers cannot be achieved safely, and in some cases the lifting platforms will not deploy or provide contact with the ground. Based on the research reported in BS8300 and our own local research we advise an additional allowance of at least 3m, preferably 3.5m beyond the length and width of a standard 4.8 x 2.4m bay for public car parks, i.e. a space 8m length x 6m width can potentially accommodate both side access and rear access WAVs. For wheelchair accessible housing, we advise consideration when locating the dwelling to consider the potential to provide adequate space to facilitate easy extension of the standard driveway/footpath provision for WAV users where the end occupier is not known.

Similarly, the potential occupation by WAV users should be considered in relation to the provision of any garage or carport facility; and although the latter is more easily achievable, the potential to provide a larger covered area requires consideration to avoid any structural constraints or to minimise any adaptations later.

Ref 3.4\_L3: Consideration should also be given to the width and length of driveways (with or without covered access) and garaging of vehicles by elderly or disabled couples who can both experience mobility impairments and need access at both sides and around their vehicle to accommodate their mobility needs for getting in and out of the vehicle with doors fully open both sides, to accommodate their mobility aids (i.e. walking

frame/stroller, wheelchair, or mobility scooter); a need which is likely to increase with the increasing proportion of our ageing population.

Ref 3.5\_L3: Whilst the provision of 1200mm side aisles (access zones) to both sides within a communal parking area is a welcomed provision and potentially responds to the issue highlighted above for such as a couple with impaired mobility, the omission of the 1200mm rear access zone within a communal parking area makes no sense when access is likely required for mobility aids as well as other items being carried in the vehicle.

**QA1.18** Do you agree that improved evidence of wheelchair users housing needs is necessary? Y/N

YES  NO

Comments:

Yes

Whilst we agree improved evidence of wheelchair housing needs is necessary, we do not see this as any reason to delay agreement of a national standard for wheelchair accessible/adaptable homes following this consultation, or for delaying the implementation of this standard with support of revisions to the Building Regulations.

We recognise the inevitable delay that will follow in any case with implementation of a programme for research, review and updating of the national standard followed by a similar later review and update to the Building Regulations, plus any transitional arrangements which will also delay implementation of the new standards through the existing procurement routes.

**QA1.19** If DCLG was to lead on this research, would you or your organisation be able and willing to collaborate in such a project? Y/N

YES  NO

Comments:

GAP would be pleased to be invited to assist in such collaboration and subject to agreement with Gateshead Council and other parties involved in DESUIF, we

would wish to extend that collaboration by virtue of our current partnership approach and links with other groups and organisations. As GAP are a voluntary sector organisation, with limited financial resources, we would look to recover our expenses as and where appropriate for our involvement with DCLG.

**QA1.20** Do you agree with the working group's proposed differentiation between wheelchair accessible and wheelchair adaptable housing?  
Y/N

YES  NO

Comments:

Yes, we accept the working group's proposed differentiation between wheelchair accessible and wheelchair adaptable housing on the basis of the definitions provided in the Glossary, i.e. :-

Wheelchair accessible: Level 3 home in which it is reasonably certain that the first occupants will include a wheelchair user.

Wheelchair adaptable: Level 3 home in which the first occupants are not known.

## Space – General questions

<b>Q13</b>	Would you support government working with industry to promote space labelling of new homes? Y/N
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q14</b>	Do you agree with this suggested simple approach to space labelling? Y/N.
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q15</b>	If not, what alternative approach would you propose?
Comments:	

<b>Q16</b>	Would you support requirements for space labelling as an alternative to imposing space standards on new development? Y/N.
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Comments:	

<b>Q17</b>	Would you support the introduction of a benchmark against which the space labelling of new properties is rated? Y/N Please give reasons for your answer.
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
<p>Comments:</p> <p>Q17</p> <p>Space labelling should not be the sole method of achieving adequate dwelling sizes. Space labelling is useful information, but space standards are required.</p> <p>There will be people with access requirements that are not met even with level 3 being achieved. Benchmarking and space labelling could help these and others (but would not help deliver accessibility necessarily).</p> <p>There is no reason why a space label itself should be benchmarked. Buyers would come to understand the sizing implied by the label, whereas they may not readily appreciate the size of space relative to its function without having experienced the space. It could thus empowers consumers to make comparisons and choice.</p>	

<b>Q18</b>	Which of the following best represents your view? Please provide reasons for your views.
<p>a) Local authorities should not be allowed to impose space standards (linked to access standards) on new development.</p> <p>b) Local authorities should only be allowed to require space standards (linked to access standards) for affordable housing.</p> <p>c) Local authorities should be allowed to require space standards (linked to access standards) across all tenures.</p>	
A <input type="checkbox"/> B <input type="checkbox"/> C <input checked="" type="checkbox"/>	
Comments:	

<b>Q19</b>	Do you think a space standard is necessary (when linked to access standards), and would you support in principle the development of a national space standard for use by local authorities across England? Y/N
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q20</b>	Do you agree with the proposed limiting of the scope of any potential space standard to internal aspects only? Y/N
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	
<p>We agreed in part with the question but make the following points:</p> <p>Local authority should be able to decide on local issues for external areas reflecting on local needs, anticipated occupancy and location.</p> <p>However, we feel that the national standards should be set for local implementation and include items such as: External approaches, storage, landings, areas to hang out laundry and access to waste and recycle bins.</p> <p>Private garages should be treated as an internal area because surveys have shown their use for domestic storage; but communal parking areas and the layout and surfacing of paths and landscaping are a matter for planning control.</p>	

<b>Q21</b>	Do you agree that Space Standards should only be applied through tested Local Plans, in conjunction with access standards, and subject to robust viability testing?
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	

Comments:

We agree that space standards should be applied through agreed local plans in conjunction with access standards, but we do not agree with space standards and accessibility being subject to viability testing.

We believe that viability testing is not consistent with a local planning authority's general duty under the Equality Act 2010 to take account of any extra needs that disabled person may have in relation to a Council's planning decision or planning policy.

Therefore in recognition of the Equality Act 2010, we do not believe that viability testing can be lawfully applied to a planning authority's decision or proposal as to how many wheelchair homes are to be planned or are needed in its area, neither to the council's decision as to how many Tier 1 or combined Tier 1/Tier 2 standard homes are needed in its area, or whether to apply a combined Tier 1/Tier2 need to new sheltered homes or extra care housing development for which planning permission is sought.

We therefore propose that the legal ground on the above is explained in DCLG's new National Planning Practice Guidance to avoid uncertainty and any costly legal actions to establish the point.

**Q22**

Do you agree with the costs and assumptions set out in the impact assessment? We are particularly interested in understanding;

a) Do stakeholders agree with our assumption that house builders are able to recover 70% of the additional cost associated with space in higher sales values?

b) Do you agree with the extra over unit costs we have used for the current and proposed space standards? If you do not agree, could you provide evidence to support alternative figures for us to include in the final impact assessment?

c) Do you agree with the proportion of homes we have estimated to have taken up space standards in the "do nothing" and "option 2" alternatives? If you do not agree, could you provide evidence to support alternative figures for us to include in the final impact assessment?

Please provide reasons for your answers.

A  B  C

Comments:

**Q23** If you do not agree with the costs set out in the impact assessment please state why this is the case, and provide evidence that supports any alternative assumptions or costs that should be used?

Comments:

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

Comments:

**Q25** Can you provide any of the following, (supporting your submission with evidence wherever possible)?

- a) Evidence of the distribution of the size of current private and affordable housing development?
- b) Evidence of space standards required by local authorities stating what is required and by whom?
- c) Evidence of the likely cost impact of space standards?

A  B  C

Comments:

<b>Q26</b>	What issues or material do you consider need be included in H6 of the Building Regulations, in order to address the issues identified above?
Comments: Accessibility to the related facilities and avoidance of obstructions to access for disabled and elderly people.	

<b>Q27</b>	Do you agree with this approach to managing cycle storage? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

## Space - Technical questions

<b>QA2.1</b>	Do you agree that any space standards, if adopted, should be coordinated with the requirements of relevant accessibility standards? Y/N
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>QA2.2</b>	Do you agree with Gross Internal Areas indicated at Level 1, 2 and 3, shown in Table A1-3? If not, please provide reasons for your answer. Y/N
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>QA2.3</b>	Do you think it is necessary to define minimum areas for bedrooms and do you agree with the areas for bedrooms indicated at Level 1, 2 and 3 in Table 2? Y/N
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>QA2.4</b>	Are the performance requirements for level 1 of the space standards proposed by the working group pitched at the right level? Please indicate which of the options below you agree with.  a) they go too far, and should be reduced b) they are about right c) they don't go far enough
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A  B  C

Comments:

**QA2.5** If you do not entirely agree (ie your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).

Comments:

We wish to see the baseline standard including features of Level and Level 2

**QA2.6** Are the performance requirements for level 2 of the space standards proposed by the working group pitched at the right level? YN Please indicate which of the options below you agree with.

- a) they go too far, and should be reduced
- b) they are about right
- c) they don't go far enough

A  B  C

Comments:

**QA2.7** If you do not entirely agree (ie your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).

Comments:

**QA2.8** Are the performance requirements for level 3 of the space standards proposed by the working group pitched at the right level? YN Please indicate which of the options below you agree with.

- a) they go too far, and should be reduced
- b) they are about right
- c) they don't go far enough

A <input type="checkbox"/>	B <input checked="" type="checkbox"/>	C <input type="checkbox"/>
Comments:		

<b>QA2.9</b>	If you do not entirely agree (ie your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).
Comments:	

## Security – General questions

<b>Q28</b>	Do you support the view that domestic security for new homes should be covered by national standards/Building Regulations or should it be left to market forces/other?  a) national standards/Building Regulations  b) market forces/other  Where possible, please provide evidence to support your view?
A <input type="checkbox"/> B <input type="checkbox"/>	
Comments:	

<b>Q29 – Part 1</b>	Do you think there is a need for security standards? Y/N
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q29 – Part 2</b>	If yes, which of the approaches set out above do you believe would be most effective to adopt (please select one only)?  a): Option 1 – A baseline (level 1) standard and a higher (level 2) standard.  b): Option 2– A single enhanced standard (level 2) for use in areas of higher risk only.
A <input type="checkbox"/> B <input type="checkbox"/>	
Comments:	

<b>Q30</b>	<p>If the level 2 standard is used how do you think it should be applied;</p> <p>a) On a broad local basis set out in local planning policy?</p> <p>Or</p> <p>b) On a development by development basis?</p>
<p>A <input type="checkbox"/> B <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>Q31</b>	<p>Do you believe that there would be additional benefits to industry of integrating the proposed security standards in to the Building Regulations as 'regulated options'? Y/N</p>
<p>YES <input type="checkbox"/> NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>Q32</b>	<p>If security standards are integrated in to the Building Regulations, would you prefer that;</p> <p>a) level 1 and level 2 become optional 'regulated options' for use by local authorities? Or</p> <p>b) level 1 be required as a mandatory baseline for all properties with level 2 a regulated option for use by local authorities?</p>
<p>A <input type="checkbox"/> B <input type="checkbox"/></p>	

Comments:

**Q33** Do you agree with the overall costs as set out in the accompanying impact assessment? Y/N.

If you do not agree, then do you have evidence to support alternative figures?

YES  NO

Comments:

**Q34** Do you agree that level 1 security reflects current industry practice? Y/N.

If you do not agree, then do you have evidence to support an alternative view?

YES  NO

Comments:

**Q35** Do you agree with the assumptions used to derive the extra over cost of Secured By Design as set out? Y/N

If you do not agree, then do you have evidence to support alternative figures?

YES  NO

Comments:

<b>Q36</b>	<p>Do you agree with the number of homes which incorporate Secured By Design standards that have been used in the accompanying impact assessment? Y/N.</p> <p>If you do not agree, then do you have evidence to support alternative figures?</p>
<p>YES <input type="checkbox"/>    NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>Q37</b>	<p>Do you agree with the assumptions of the growth in the use of Secured By Design standards over the 10 years of the 'do nothing option' in the accompanying impact assessment? Y/N.</p> <p>If you do not agree, then do you have evidence to support alternative figures?</p>
<p>YES <input type="checkbox"/>    NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>Q38</b>	<p>Do you agree with the assumptions for the 'take up' of the proposed security standards in the accompanying Impact Assessment? Y/N.</p> <p>If you do not agree, then do you have an alternative estimate that can be supported by robust data?</p>
<p>YES <input type="checkbox"/>    NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>Q39</b>	Do you agree with the unit costs as set out in the accompanying impact assessment for the “do nothing” and “option 2” alternatives? Y/N.  If you do not agree, please provide evidence to support alternative figures for us to include in the final impact assessment?
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

## Security – Technical questions

<b>QA3.1</b>	Are the performance requirements for the baseline security standard proposed by the working group pitched at the right level? Please indicate which of the options below you agree with.  a) they go too far, and should be reduced b) they are about right c) they don't go far enough
A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>	
Comments:	

<b>QA3.2</b>	If you do not entirely agree, (i.e. your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).
Comments:	

<b>QA3.3</b>	Are the performance requirements for the higher level of the security standards proposed by the working group pitched at the right level? Please indicate which of the options below you agree with.  a) they go too far, and should be reduced b) they are about right c) they don't go far enough
A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/>	
Comments:	

<b>QA3.4</b>	If you do not entirely agree, (ie your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).
Comments:	

## Chapter 4: Water efficiency

<b>Q40</b>	Do you agree a national water efficiency standard for all new homes should continue to be set out in the Building Regulations? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q41</b>	Do you agree that standards should be set in terms of both the whole-house and fittings-based approaches? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q42</b>	Do you agree that the national minimum standard set in the Building Regulations should remain at the current Part G level? Y/N. (see also Question 43)
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q43</b>	Do you agree that there should be an additional local standard set at the proposed level? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q44</b>	Do you agree that no different or higher water efficiency standards should be able to be required? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q45</b>	Would you prefer a single, tighter national baseline rather than the proposed national limit plus local variation? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q46</b>	Do you agree that local water efficiency standards should only be required to meet a clear need, following consultation as set out above and where it is part of a wider approach consistent with the local water undertaker's water resources management plan? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q47</b>	Should there be any additional further restrictions/conditions? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q48</b>	<p>Do you agree with the unit costs as set out in the accompanying Impact Assessment for the “do nothing” and “option 2” alternatives? Y/N.</p> <p>If you do not agree, please provide the evidence to support your alternative figures.</p>
<p>YES <input type="checkbox"/>    NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>Q49</b>	<p>Do you agree with the number of homes which we estimate will incorporate the proposed tighter water standard in the accompanying Impact Assessment? Y/N.</p> <p>If you do not agree, please provide the evidence to support your alternative figures.</p>
<p>YES <input type="checkbox"/>    NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>Q50</b>	<p>Do you currently require through planning that new homes are built to a higher standard of water efficiency than required by the Building Regulations through:</p> <p>a) a more general requirement to build to Code Level 3 or above? Or</p> <p>b) a water-specific planning requirement? And</p> <p>c) are you likely to introduce or continue with a water-specific water efficiency standard (beyond the Building Regulations) in the future?</p>
<p>A <input type="checkbox"/></p>	
<p>B <input type="checkbox"/></p>	
<p>C <input type="checkbox"/>    YES <input type="checkbox"/>    NO <input type="checkbox"/></p>	
<p>Comments:</p>	

## Water – Technical questions

<b>QA4.1</b>	Are the proposed performance requirements for the higher level of the water standard pitched at the right level? Please indicate which of the options below you agree with.  a) it goes too far, and should be reduced b) it is about right c) it doesn't go far enough
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A  B  C

Comments:

<b>QA4.2</b>	If you do not entirely agree, (ie your answer is a) or c), what aspects should be different and why (please provide reasons for your answers, identifying the specific measure by reference number where possible).
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Comments:

## Chapter 5: Energy

<b>Q51</b>	The government considers that the right approach is that carbon and energy targets are only set in National Building Regulations and that no interim standard is needed. Do you agree? Y/N  If not, please provide reasons for your answer.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q52</b>	Are respondents content with the proposal in relation to each energy element of the Code for Sustainable Homes? Y/N.  If not, what are the reasons for wanting to retain elements? If you think some of these elements should be retained should they be incorporated within Building Regulations or set out as a nationally described standard. Please give your reasons.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q53</b>	Do consultees agree with the number of homes we have estimated which currently have a renewable target and the costs associated with incorporating such a target? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q54</b>	<p>Do you agree with the unit costs for the code set out in the accompanying impact assessment for the “do nothing” and “option 2” alternatives? Y/N.</p> <p>If you do not agree, please provide the evidence to support your alternative figures</p>
<p>YES <input type="checkbox"/>    NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>Q55</b>	<p>Do you agree with the proportion of homes we have estimated will incorporate the Code and the Planning &amp; Energy Act 2008 (aka Merton rule) over the next 10 years? Y/N.</p> <p>If you do not agree, please provide the evidence to support your alternative figures.</p>
<p>YES <input type="checkbox"/>    NO <input type="checkbox"/></p>	
<p>Comments:</p>	

<b>Q56</b>	<p>What are your views on the future of the Planning and Energy Act 2008 (“Merton’s Rule” type planning policies) in relation to the preferred Building Regulations only approach to energy standards?</p>
<p>Comments:</p>	

## Chapter 6: Indoor environmental standards

<b>Q57</b>	Government is interested in understanding the extent to which daylighting in new homes is a problem, and the appetite for a daylighting design standard to be available to designers and local authorities.  a) Do you believe that new homes are not achieving a sufficient level of daylighting in habitable rooms? Y/ N. If so what evidence do you have that this is the case (please submit evidence as part of your consultation response)?  b) Do you think that it is desirable to consider having a national daylighting standard for use in the design of new homes? Y/N.
A) YES <input type="checkbox"/> NO <input type="checkbox"/>	
B) YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q58</b>	Do you agree that a review of simple percentage based methodologies should be undertaken to help determine if such an approach is fit for purpose? Y/N.  If you have any relevant research or evidence please submit this as part of your consultation response.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q59</b>	Do you agree that sunlighting should sit outside the scope of this review? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

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<b>Q60</b>	Do you agree that essential indoor air quality issues should be addressed through ongoing review of Part F (Ventilation) of the Building Regulations? Y/N.
YES <input type="checkbox"/>	NO <input type="checkbox"/>
Comments:	

## Chapter 7: Materials

<b>Q61</b>	Do you agree that materials standards are best left to the market to lead on? Y/N.
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

## Chapter 8: Process and compliance

<b>Q62</b>	Which of the above options do you prefer (1, 2, or the hybrid approach)? Please provide reasons for your answer.
1 <input type="checkbox"/> 2 <input type="checkbox"/> Hybrid <input type="checkbox"/>	
Comments:	

<b>Q63</b>	Do you think that moving to a nationally consistent set of housing standards will deliver supply chain efficiencies to home builders? Y/N.  If yes, can you provide estimates and evidence of the level of efficiency that could be achieved?
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	

<b>Q64</b>	Do you think that moving to a nationally consistent set of housing standards could help reduce abortive or repeated costs during the construction stage of home building? Y/N.  If yes, can you provide estimates and evidence of the level of efficiency that could be achieved?
YES <input type="checkbox"/> NO <input type="checkbox"/>	
Comments:	