



Welsh Government

Consultation – summary of response

Mandatory quality standards for new homes

Welsh Development Quality Requirements 2021

Creating Beautiful Homes and Places

June 2021

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.

This document is also available in Welsh.

Summary of responses

1. Introduction

- 1.1 Housing is a key priority for Welsh Government and it is recognised that living well in a quality home brings a wide range of benefits to health, learning and prosperity. High quality new homes in the right locations are essential in Wales to meet the need for housing.
- 1.2 Housing schemes built using Social Housing Grant (SHG) and other forms of public subsidy are currently required to meet Welsh Government Development Quality Requirements 2005 (DQR). The current version has been subject to several updates and associated explanatory circulars. It is widely considered that the current standard is in need of simplification and review and that more consideration needs to be given to design quality, sustainability, innovation, modern methods of construction and carbon reduction.
- 1.3 Workshops were held with all stakeholders in 2015 to inform the process of revising the standards and the results were incorporated into a revised version that was subject to a consultation in 2016. However, the revised standard was not issued and was overtaken by the Independent Review of Affordable Housing Supply, dated April 2019 (AHR).
- 1.4 A key recommendation of the AHR stated that Welsh Government should develop new consolidated and simplified standards for new build grant funded homes and affordable homes delivered through planning agreements (under section 106 of the Town and Country Planning Act 1990) and planning conditions. These standards should be simpler to use and should not have conflicting requirements. The new standards should concentrate on minimum space standards, including storage inside and outside. The AHR also recommended the introduction of a requirement for all new affordable homes to be near zero carbon / EPC 'A' using a fabric first approach from 2021, supplemented by technology (renewables) if required.. The AHR also recommended Welsh Government to set a longer term goal of 2025 at the latest to have the same standards for all homes irrespective of tenure.
- 1.5 Drawing on the results of the 2015 consultation and the subsequent extensive AHR workgroup findings, a new standard was developed in 2020 to replace DQR, titled "Beautiful Homes and Spaces" (BHS). The proposed new standard was the subject of a full twelve week consultation commencing 1 August 2020.
- 1.6 The aim of the consultation was to take account of a wide range of views on the 2020 proposals in order to finalise the housing standard to meet the recommendations of the AHR.
- 1.7 This document summarises and provides commentary on the received responses to the consultation which closed 1 November 2020 and provides the Welsh Government response which resulted in the publication of the revised housing standard in 2021.

2. Publicity

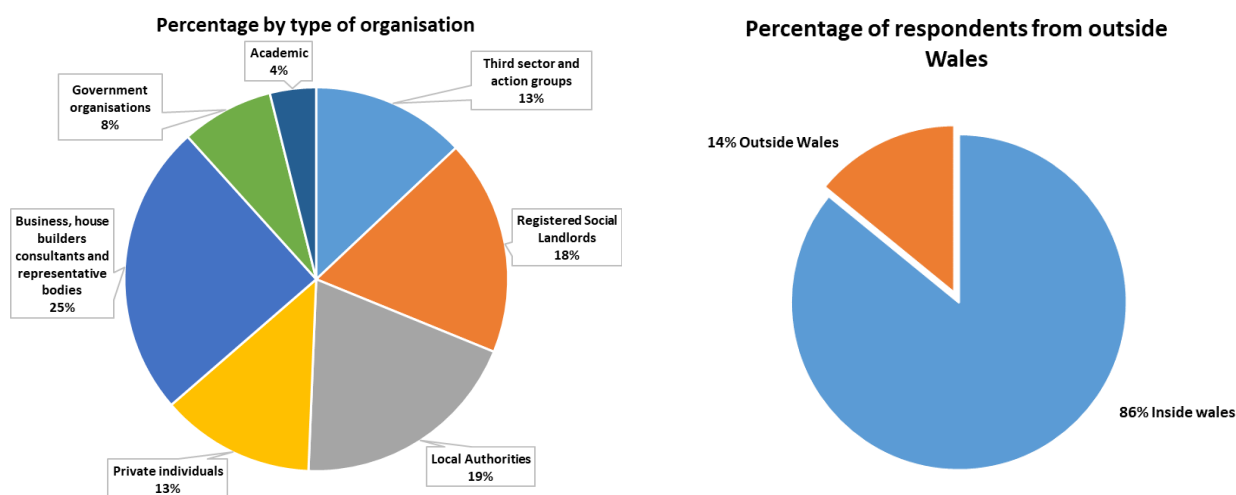
2.1 Details of the consultation were published on the Welsh Government's website throughout its duration and key stakeholders were informed directly.

3. Responses

3.1 A total of 77 responses were received, including 3 late submissions which were treated with equal status to those submitted by the consultation closure date and Welsh Government is grateful to all those who responded.

3.2 All the consultation responses have been read and considered as part of this analysis.

3.3 The largest group of respondents was businesses (19 responses – comprising mainly housing developers, consultants and construction related representative bodies) representing 25% of replies. There were 15 contributions from Local Authorities representing 19% of respondents and 14 contributions from Registered Social Landlords (RSL's) representing 18%. There were also 10 replies from private individuals and 10 responses from the third sector (including action groups) representing 13% of responses each. Government organisations contributed 6 representing 8% and there were 3 responses from academic institutions representing the final 4%. The academic responses included an influential contribution from Pupils2Parliament, a children's group from Presteigne Primary School.



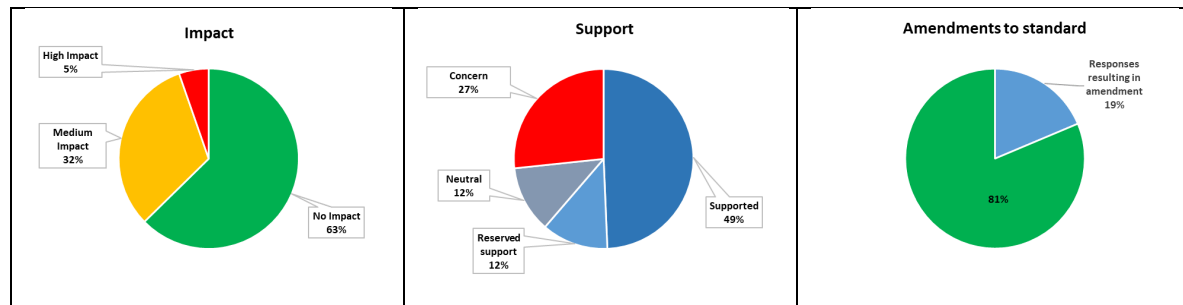
86% of responses were from within Wales with 14% from outside of Wales.

A list of all the respondents by category is set out in the Appendix. 16 responders asked for their responses to remain anonymous.

4. Summary of responses by question

4.1 Section four summarises responses to the 17 consultation questions.

4.2 The responses to questions were analysed against their percentage level of “Impact”, level of “Support” and the percentage of responses that resulted in “Amendments to the standard” presented as pie charts as shown.



4.3 “Impact” was assessed using “red amber green” categories to filter those responses of high impact (red) requiring serious consideration to amend the standard, those responses with medium impact (amber) potentially requiring amendments and those responses that would not impact (green) requiring no amendment.

4.4 The level of “Support” for the standard primarily indicates (red) the level of challenge to the proposals against support (blue) or neutrality (grey).

4.5 The “Amendments to the standard” chart identifies the percentage of responses that resulted in a modification to the proposals.

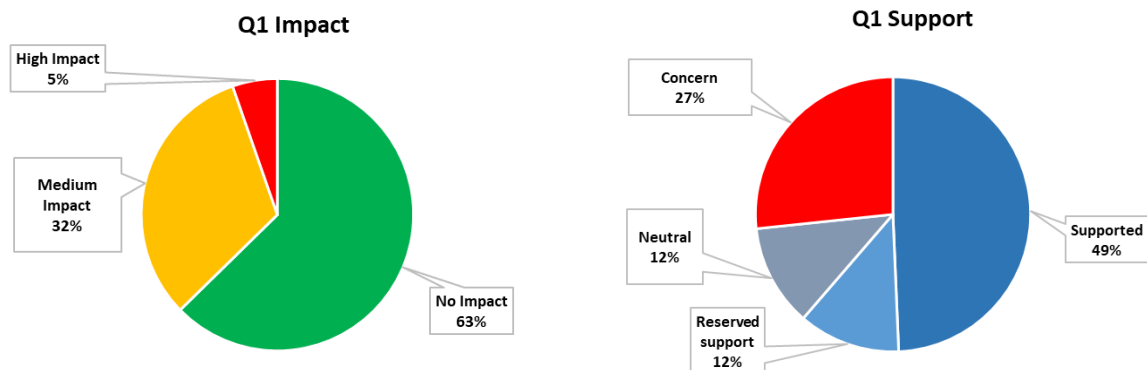
4.6 The above diagrams illustrate that although there has been a majority in support, a significant percentage of concern resulted in 19% of consultation responses having a direct impact requiring amendments to the standard.

4.7 Welsh Government comments to responses are shown in italic text within “response themes, summaries and commentaries” against each question below...

4.8 Question 1 (Q1):

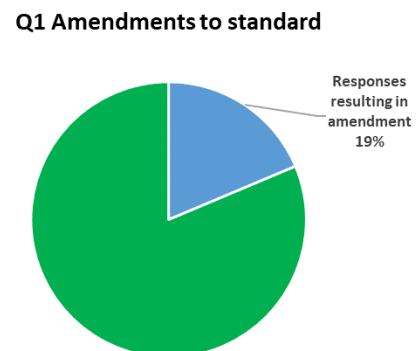
“What are your general views on the proposed new policy with regard to the issues itemised within the above summary”

4.9 Seventy five responses were received to the question, of which 5% were considered to have high impact, 32% of medium impact and 63% of no impact.



4.10 Although there was broad support for the policy, 27% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.11 The percentages of high and medium impact, combined with the 27% concern challenging the policy resulted in 19% of the responses effecting a material change to the proposed standard.



4.12 Question 1 response themes, summaries and commentary

4.13 Consensus that the proposals sufficiently set out a shift to more spacious, secure and warm homes with improved quality of life afforded through better design. *Noted*

4.14 Concern that design needed to be more context based with an emphasis on place making and not driven to minimum standards. *This has resulted in minor changes to the wording of a Preface.*

4.15 Concern about green space, “Active Travel” and the importance of community accessibility. *This has resulted in minor changes to wording including a requirement for bike storage and consideration for sustainable travel, ecological sustainability and community values.*

4.16 Support for MMC, the emphasis on the circular economy and for sustainable energy solutions, notably to future proofing energy solutions through a “fabric first” approach. *Noted*

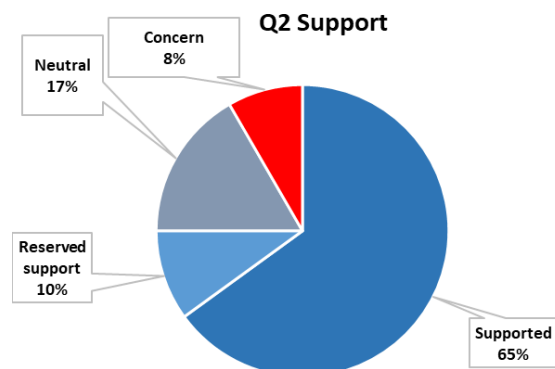
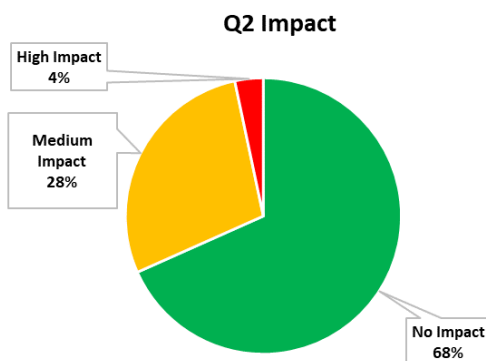
4.17 Concern that MMC should be flexible and site specific so that genuine quality benefits are achieved is acknowledged. *Noted, however the standard aligns with Welsh policy on MMC and allows for a range of sustainable opportunities.*

- 4.18 Concern that the standard had insufficient emphasis on the achievement of low carbon design to meet national climate change commitments. *This has resulted in re-wording to provide alignment with policies that are driving Wales to a net zero carbon future.*
- 4.19 Expectation that the document might have been more ambitious in prescribing standards in more detail rather than relying on best practice. *Noted, however the standard responds to recommendations from the Independent Review of Affordable Housing Supply (2019) for consolidated and simplified standards and leaves the responsibility for achieving high quality in the hands of housing providers who must (by the use of best practice) set their own quality agenda.*
- 4.20 Requests for flexibility in the interpretation of the standard. *This has resulted in amendment of the space standard.*
- 4.21 Concerns about the need for s106 clarity. *Noted and suitable amendments have been made to Planning policy.*
- 4.22 Housing should be flexible to meet the changing needs of people as they grow older and that design should embrace fully wheelchair accessible homes. *The concern is acknowledged but the adoption of the Lifetime Homes Standard is considered to sufficiently fulfil the obligation for general need housing with other needs being assessed individually.*
- 4.23 Cost concerns in meeting the standards, notably space and energy. *Noted and will be addressed through updated grant funding.*
- 4.24 Concern about larger house types impacting on the availability of suitable starter homes and that lower development densities arguably may result in the delivery of fewer homes. *Noted, however the proposals on space standards follow the direction of travel for housing quality, as advocated by the Independent Review of Affordable Housing Supply 2019.*
- 4.25 Request to cross reference with other government policies. *Noted but not considered necessary within the standard.*
- 4.26 Concerns about a need for further tenant consultation. *Noted, however there have been several tiers of consultation associated with the drafting of the standard, including two major affordable housing reviews and informal sector consultations in addition to this consultation which was open to the public.*

4.27 Question 2 (Q2):

“What are your general views on the proposed new policy with regard to the “evidence for change” itemised within the above Summary”

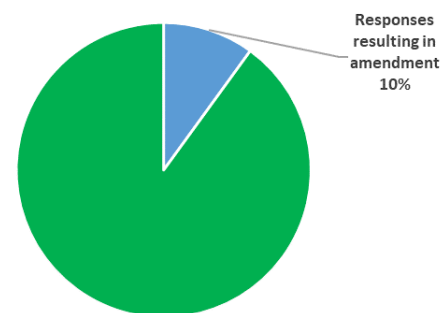
4.28 Sixty responses were received to the question, of which 4% were considered to have high impact, 28% of medium impact and 68% of no impact.



4.29 Although there was broad support for the policy, 8% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.30 The percentages of high and medium impact, combined with the 8% concern challenging the policy resulted in 10% of the responses effecting a material change to the proposed standard.

Q2 Amendments to standard



4.31 Question 2 response themes, summaries and commentary

4.32 Support for the new standard to replace DQR 2005 and that the Welsh Government has decided to carry out a full consultation on the new standard following the Affordable Housing Review. *Noted*

4.33 Agreement to the emphasis on housing quality, innovation, sustainability, flexibility, safety, security and minimum space requirements for driving up housing standards and for more consistency in quality achievements. *Noted*.

4.34 Recognition of the importance of flexibility in design and the need to accommodate future needs through standards that are able to accommodate change without undue retrofit costs. *Noted*.

4.35 Concern about home working considered all the more marked during the Covid-19 pandemic with more people being required to work and stay at home. *This resulted in changes relating to flexibility of space and internet connectivity.*

4.36 The draft standard incorrectly referred to ‘affordable housing’ being defined in TAN 12. *The standard has been revised to correctly reference TAN 2.*

4.37 Suggestion that space requirements should be more aligned to the Nationally Described Space Standard (NDSS) in England and some concern raised about the reasoning behind the specified space standards. *It is noted that well designed, space*

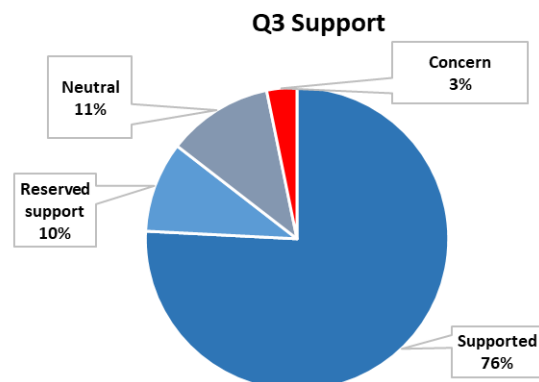
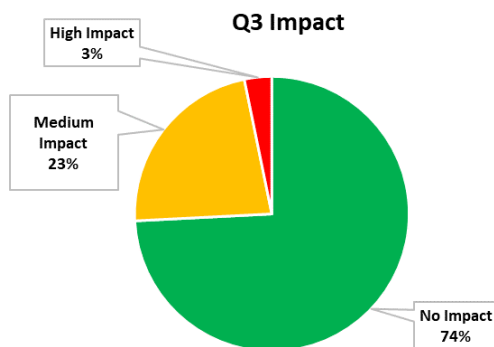
efficient homes can be achieved in different footprints than is proposed in the minimum space standards, therefore flexibility has been introduced to address the concern and to further align with NDSS.

- 4.38 Whilst there is acknowledgement in responses that the approach proposed in the new standard points to a more mature and flexible approach in order for sector to respond to the provision of good housing, there was some disagreement that the policy in its current proposed form will achieve its aspirations. *Noted, however the standard sets out the vision and leaves the responsibility for achieving high quality much more in the hands of housing providers who must (by the use of best practice) set their own quality agenda rather than rely on overly prescriptive requirements which are likely to be quickly outdated, which was the case with DQR 2005.*
- 4.39 Concern about developer's s106 homes being smaller in floor area than grant funded affordable housing. *Amendments have been made to planning policy supporting s106 compliance with housing quality standards.*
- 4.40 Supply concerns noted regarding the necessity for all affordable homes, such as Low Cost Home Ownership (LCHO) and s106 homes to be meet the proposed minimum space standards when that could adversely affect delivery of numbers and reduce affordability. *Concerns about costs and supply of homes noted, however the standard responds to the Welsh Government direction of travel to deliver high quality sustainable homes in all tenures.*
- 4.41 Questions raised about tenant consultation. *It is noted that there have been several tiers of consultation associated with the drafting of the standard, including two major affordable housing reviews and informal sector consultations in addition to this consultation which was open to the public.*
- 4.42 The adaptability of homes for better inclusivity and accessibility is welcomed and there is general support for the implementation of the Lifetime Homes (LTH) standard, with some concern that LTH standard needs to be reviewed and changed to support the new policy. *It is considered that the adoption of the current Lifetime Homes Standard fulfils the requirements.*
- 4.43 Concern that the "evidence for change" itemised in the summary makes no connection to the wider planning picture. *The concerns are noted however the new standard is one of many policy documents that form a suite of standards that fulfil the wider Welsh Government quality agenda and it is not considered necessary to cross reference all policy matters.*
- 4.44 Support for specifying Secured by Design "Gold standard" which was unclear in DQR 2005. *Noted.*
- 4.45 Suggestion that housing standards could be better addressed and legislated under the building regulations. *Noted, but this does not follow the direction of travel for housing quality as advocated by the Independent Review of Affordable Housing Supply 2019. It is however accepted that existing planning policy and/or building regulation changes may be necessary for the standard to be applied to housing of all tenures in the future.*
- 4.46 Whilst there was some agreement with the statement 'House sizes are becoming too small' and some considered that the new standard could provide "an excellent juncture to inspire change in terms of design quality", there was also some disagreement with the statement and considered a generalisation which may not apply to all homes. *Noted.*

4.47 Question 3 (Q3)

“Do you think there are the benefits to the proposed new policy”

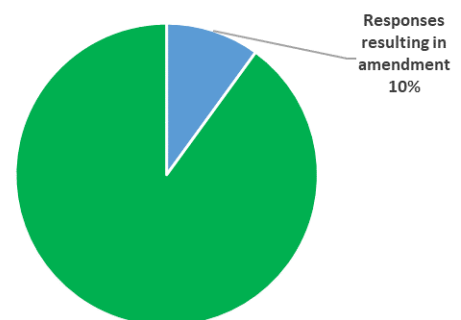
4.48 Sixty two responses were received to the question, of which 3% were considered to have high impact, 23% of medium impact and 74% of no impact.



4.49 Although there was broad support for the policy, 3% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.50 The percentages of high and medium impact, combined with the 3% concern challenging the policy resulted in 10% of the responses effecting a material change to the proposed standard.

Q3 Amendments to standard



4.51 Question 3 response themes, summaries and commentary

4.52 Support for the proposed concise, clear, consistent and easy to understand standards across Wales which will encourage high quality design and benefit residents. *Noted.*

4.53 Support for more space for tenants which could have a positive impact on mental health and assuring to see that consideration has been given to provide additional space for innovative technologies. *Noted.*

4.54 The use of space requirements to support compliance with the Lifetime Homes Standard is considered to be a positive proposal which could have far-reaching benefits whereby residents will have more autonomy in remaining in their homes as they grow older. *Noted*

4.55 The standard is considered to be “forward thinking” both in terms of creating “Beautiful Homes” and moving toward zero carbon build and likely to have a positive impact on the energy efficiency sector, as the implementation of standards develops industry confidence. *Noted.*

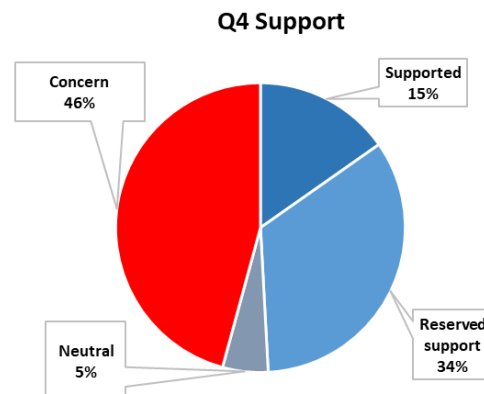
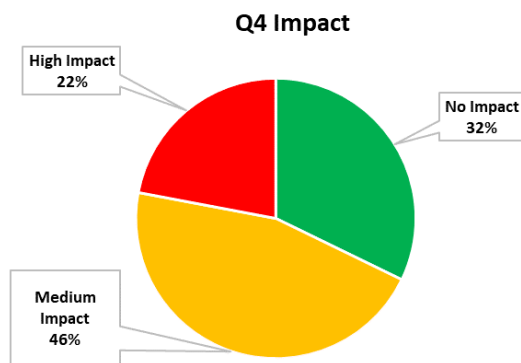
4.56 Opinions that the document goes some way to promoting sustainable development which is welcomed, but could be strengthened. *The sustainability, net zero carbon and circular economy section has been re-worded following such comments and advice to provide alignment with policies that are driving Wales to a net zero carbon future.*

- 4.57 The promotion of MMC is considered to be good. The policy allows greater scope for applying new and emerging methods of construction and use of new systems and materials to reduce carbon in construction and living. *Noted.*
- 4.58 Statement that housing providers want to create communities and sustainable homes. The standard gives the opportunity to develop innovative, modern homes which are flexible in terms of design and use, utilising sustainable materials. *Noted.*
- 4.59 Support for the Secured by Design Gold standard encouraging the reduction of crime and anti-social behaviour. *Noted.*
- 4.60 Concern about the proposals for “sleep over” were considered to be unclear. *This resulted in amendments to clarify the requirement.*
- 4.61 Concerns about the use of the document to encourage good design. *Noted, however the standard sets out the vision and leaves the responsibility for achieving high quality in the hands of housing providers who must (by the use of best practice) set their own quality agenda.*
- 4.62 Comment that having clear and explicit requirements remove any opportunity for ambiguity and non-compliance, therefore setting out ‘how’ to achieve the requirements of this new proposed policy should be consistently applied to all the requirements. *Noted, however the standard is purposely drafted to be less prescriptive where possible in line with policy decisions for simplification and flexibility.*
- 4.63 Agreement to clarification and consistency for s106 homes. *Noted.*
- 4.64 Comment that the standard could play a real role in helping to reduce the stigma linked to social housing, and more should be made of the quality element promoted through the standard by the Welsh Government. In addition, moves to see the standard apply to homes across all tenures could go some way towards reducing the differences. *This resulted in a re-worded Preface.*
- 4.65 Disagreement that the standard is beneficial “as drafted” is noted unless the standards genuinely address some of the fundamental issues around energy, carbon and performance. *Sustainability, net zero carbon and circular economy section has been re-worded to provide alignment with policies that are driving Wales to a net zero carbon future*

4.66 Question 4 (Q4):

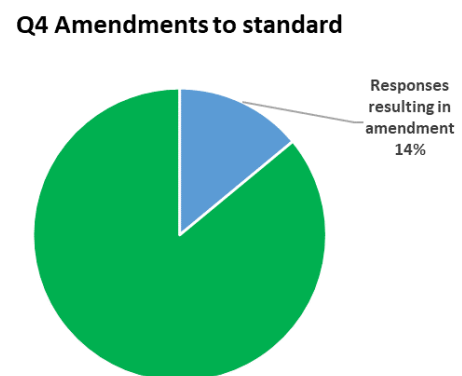
“Do you think there are any dis-benefits to the proposed new policy”

4.67 Fifty nine responses were received to the question, of which 22% were considered to have high impact, 46% of medium impact and 32% of no impact.



4.68 Although there was broad support for the policy, 46% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.69 The percentages of high and medium impact, combined with the 46% concern challenging the policy resulted in 14% of the responses effecting a material change to the proposed standard.



4.70 Question 4 response themes, summaries and commentary

4.71 Concern about limited information on outdoor space which has a big impact on wellbeing. *This resulted in amendment to clarify that gardens are to be of sufficient size and that consideration should also be given to the provision of private or communal amenity space to flats.*

4.72 Concern that the standard could be seen as a dilution of quality requirements that could bring down the quality of housing. *This resulted in a re-wording of the Preface to emphasise the intentions.*

4.73 Concern that Requirement 1 is too vague and could be a little more prescriptive and that the use of the words ‘opportunities’ and ‘considering’ allow too much freedom not to apply the benefits. *This resulted in the re wording of the section.*

4.74 Concern that the current proposed policy does not emphasise already established national policy on design quality, innovation, sustainability, and the principles of good place-making and that the policy would benefit from having a clear section at the beginning setting out its purpose and provide clarity around its vision, clearly setting out its aims and/or objectives. *This resulted in changes to emphasis outlined in a new Preface.*

4.75 Concern that the space standards proposed could deter house builders from building certain types of homes. *Noted, however the space standard is intended to ensure that all new homes in Wales are fit for purpose now and in the future. It should also be*

noted that the standard closely aligns with the English National Described Space Standard, but reflecting the Welsh context, notably futureproofing. Flexibility has been introduced to encourage innovative solutions and to be less prescriptive.

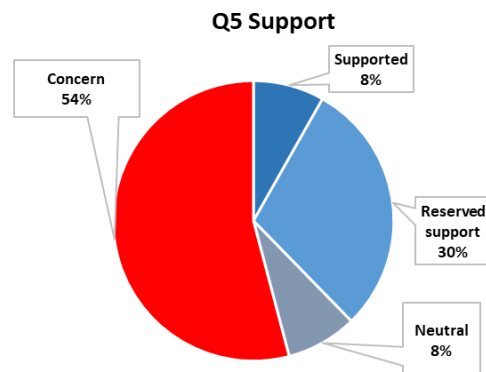
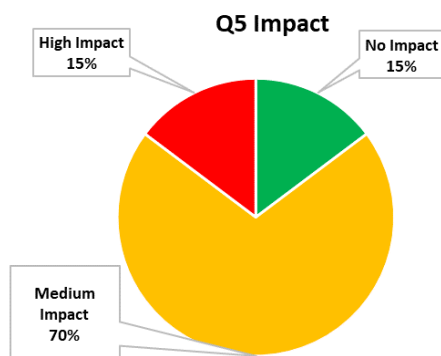
- 4.76 Concerns about additional costs. *Noted, however the standard responds to the Welsh Government direction of travel to deliver high quality sustainable homes.*
- 4.77 Concern that care needs to be taken with the “headlong rush into the wholesale use of timber in Welsh building”. *This resulted in the re wording of part of the standard to emphasise the “efficient” use of timber.*
- 4.78 Concern that the use of an EPC Rating of A may result in increased emphasis on heat electrification at the expense of energy efficiency improvements. *Noted and the standard is amended to include a revised energy section with requirements to achieve an EPC A energy rating (SAP92 or greater) through a minimum fabric standard and without the use of fossil fuel boilers. However, so as not to discourage high quality low carbon design solutions such as the Passivhaus standard, alternative proposals to EPC A and non fossil fuel fired boilers will be acceptable where it can be demonstrated by independent certification that the building’s energy demand is reduced in accordance with the Energy Hierarchy for Planning in Welsh Government’s Planning Policy Wales.*
- 4.79 There are many potential ambiguities within the proposed policy document, which could impact on negotiations and result in inconsistency in the application of the standards. *Concerns noted, however we specify minimum standards and encourage the use of best practice. Housing providers and their professional advisors are encouraged to develop good design solutions to meet their own quality requirements.*
- 4.80 As drafted these standards do not set sufficiently ambitious sustainability targets. *This resulted in the re wording of the sustainability, net zero carbon and circular economy section to provide alignment with policies that are driving Wales to a net zero carbon future.*
- 4.81 Concerns about managing expectations, delivering the 'lowest cost' rather than the 'lifetime cost'. *Noted, however the standard promotes "Whole Life Cost" analysis and quality.*
- 4.82 Concern that it is limited to affordable housing only and should be the minimum standard for all housing in Wales. *Concern noted and to be considered as future policy evolves.*
- 4.83 Concern that MMC should not be considered as a “panacea” in the light of “supply chain” and “lenders” lack of confidence. *Concerns noted, however the standard responds to the Welsh Government direction of travel to deliver high quality sustainable homes and to provide impetus to encourage innovation through funding streams such as social housing grant.*
- 4.84 Concern that there is no mention of penalties for failing to meet these standards. *Concern noted however, the standard provides quality guidance only and aims to encourage best practice. The Welsh Government have technical scrutiny processes which will help facilitate compliance for grant funded housing.*
- 4.85 Concern that the proposed standards should be aligned with other planning policy. *The concerns are noted however, the new standard is one of many policy documents that form a suite of standards that fulfil the wider Welsh Government quality agenda and is considered to be aligned with such. It is however accepted that existing Planning Policy and/or Building Regulation changes may be necessary for the standard to be applied to housing of all tenures in the future.*

- 4.86 Concern that the standard may be too open to interpretation. *Noted, however the standard sets out the vision and purposely leaves the responsibility for achieving high quality in the hands of housing providers who must (by the use of best practice) set their own quality agenda.*
- 4.87 Recommendation to amend the sustainability requirements using standards for embodied carbon (kg/m²/yr) and operational energy (energy use intensity – kWh/m²/yr). *Noted, however sustainability, net zero carbon and circular economy section has been re-worded to provide alignment with policies that are driving Wales to a net zero carbon future. Carbon targets such as upfront carbon, embodied carbon, space heating demand and total energy use intensity metrics have not been set at this time, leaving the sector to set targets in line with climate change commitments in the future.*
- 4.88 Unqualified support for all Modern Methods of Construction (MMC) which include many lightweight offerings may lead to undermining some sustainability objectives. *Concerns noted, however the standard is not considered to be worded in a way that provides unqualified support for unsustainable processes or products. The use of MMC must meet with the Welsh Government's policies to deliver high quality sustainable homes.*
- 4.89 Concern that the removal of some of the existing DQR prescriptive requirements could reduce the amenity and provide too much room for lower standard of provision particularly in the provision under S106 agreements. *Concerns noted, however the standard sets out the vision and leaves the responsibility for achieving high quality in the hands of housing providers who must (by the use of best practice) set their own quality agenda. It is considered that there are sufficient prescriptive elements remaining within the new standard to ensure the provision of high quality homes.*
- 4.90 Belief that the retention of Lifetime Homes (LTH) provides conflict in some areas. *Noted, however it is considered that the adoption of the current Lifetime Homes Standard fulfils the requirements without conflict.*

4.91 Question 5 (Q5):

**“What changes (if any) do you think are needed to the proposed new policy?
Please explain and provide evidence for your views”**

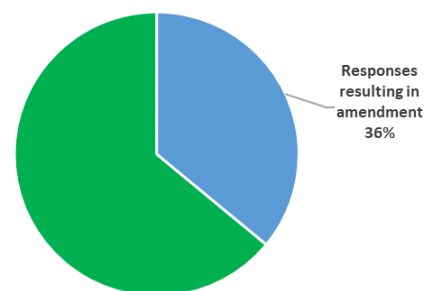
4.92 Sixty one responses were received to the question, of which 15% were considered to have high impact, 70% of medium impact and 15% of no impact.



4.93 Although there was support for the policy, 54% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.94 The percentages of high and medium impact, combined with the 54% concern challenging the policy resulted in 36% of the responses effecting a material change to the proposed standard.

Q5 Amendments to standard



4.95 Question 5 response themes, summaries and commentary

4.96 Mandate and encourage Solar PV and grey water harvesting. *Recommendation noted, however the standard is not designed to mandate for any particular form of Low Zero Carbon (LZC) technologies but sets out the vision and leaves the responsibility for achievement in the hands of housing providers.*

4.97 Need for clear spatial standards internally, externally and integration with public transport, Active Travel & cycling. *Concern noted and the standard is amended to include a requirement for bike storage and consideration for sustainable travel.*

4.98 Clarity that the standards are legally enforceable as part of the legal agreement of the S106. *Planning policy has been updated to support the requirement.*

4.99 Whole-life cycle costing analysis should be made standard on all schemes. *Whole life costing noted and covered in section 1 of the standard.*

4.100 Clarify that external design is as important as house designs. *This resulted in changes to emphasis outlined in a new preface.*

4.101 Concern that there are still some recommendation design clashes between Life Time Homes and DQR. *There are no known conflicts with LTH and the standard does not override the minimum requirements of other legislation.*

4.102 Consideration should be made to creating study rooms rather than office space. *Noted, however the proposed space standards take due account of the opportunity to provide for home working in a “suitable room”.*

- 4.103 Concerns about the lack of reference to the natural environment noted. *This resulted in amendments and a new Preface to reference ecological sustainability and community values.*
- 4.104 Consideration could be given to incorporate renewable energy, active travel, charging points for cars/bikes and digital infrastructure to support homeworking and inclusivity. *This resulted in the sustainability, net zero carbon and circular economy section being re-worded to provide alignment with policies that are driving Wales to a net zero carbon future, together with amendments to include for bike storage and consideration for sustainable travel.*
- 4.105 The proposed new policy should include minimum energy efficiency requirements with a focus on raising energy and carbon standards in line with the trajectory needed for wider climate change mitigation goals. *Noted, however carbon targets such as upfront carbon, embodied carbon, space heating demand and total energy use intensity metrics have not been set at this time, leaving the sector to set targets in line with climate change commitments in the future. The standard is amended to include a revised energy section with requirements to achieve an EPC A energy rating (SAP92 or greater) through a minimum fabric standard and without the use of fossil fuel boilers and so as not to discourage high quality low carbon design solutions such as the Passivhaus standard, alternative proposals to EPC A and non fossil fuel fired boilers will be acceptable where it can be demonstrated by independent certification that the building's energy demand is reduced in accordance with the Energy Hierarchy for Planning in Welsh Government's Planning Policy Wales.*
- 4.106 Strengthen environmental factors. *Noted which has resulted in amendments to the Preface to reference ecological sustainability and community values.*
- 4.107 A defined percentage of the homes in the proposed new policy should feature innovative and sustainable hot water and heating products. *Noted, however the standard is intended to encourage innovative and sustainable solutions to all new homes, which will be necessary to meet the requirements.*
- 4.108 Review the minimum space standards for 2 and 3 bedroom homes. *Noted and it has been decided to introduce an element of flexibility to the standard.*
- 4.109 The policy needs to include a requirement to provide a dedicated home work space, private garden or usable outdoor space, as well as adequate storage for bikes. *Noted and the standard has been amended to accommodate the suggestions.*
- 4.110 Housing must work in conjunction with other policy areas, for example to meet the goals set out by A Healthier Wales. *Concerns noted which resulted in amended wording to adequately reference adaptability and flexibility.*
- 4.111 There should be an explanation of how compliance with the new standard will be assessed. *Noted, however the policy specifies minimum standards and encourages the use of best practice where housing providers and their professional advisors must develop good design solutions. The standard purposefully encourages best practice in preference to prescriptive requirements that would need regulation. For grant funded projects, the Welsh Government's technical scrutiny procedures will be used to ensure compliance.*
- 4.112 An Equality Impact Assessment should be undertaken before adoption. *Noted and undertaken.*
- 4.113 Schedule B should include a 2-bedroom property type that would be larger than the norm to give more space to accommodate people with a mobility problem. *Noted, however the standard is written for general needs accommodation and does not*

preclude designing for a range of accommodation, including special needs. It must be accepted that not all house type variations can be accounted for.

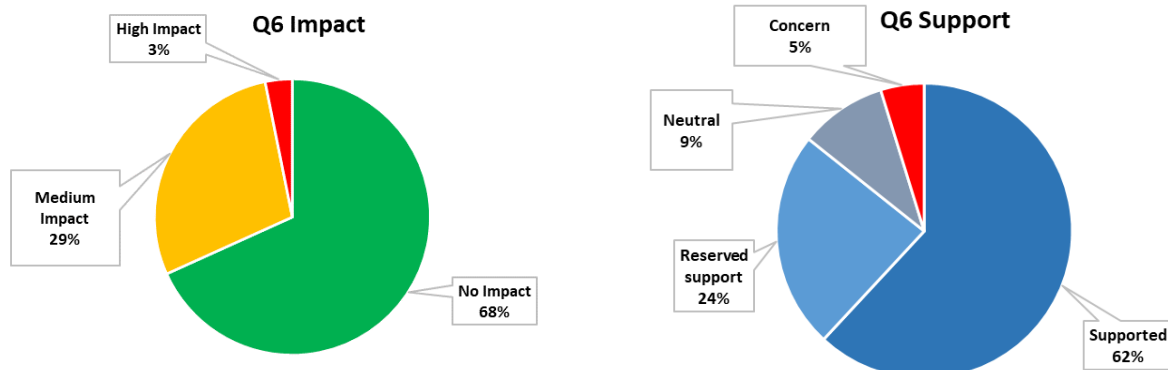
- 4.114 Showers should be mandatory on ground floor. Opinions on showers noted however Lifetime Homes is considered to be a reasonable standard. Welsh Government sets minimum standards and housing providers are encouraged to develop design solutions to meet needs, such as additional shower facilities.*
- 4.115 Clarification of whether Lifetime homes is required for flats above ground floor without a lift. Noted, however the LTH standard applies to all storey levels.*
- 4.116 Consider mandating that all 2 bedroom homes are 4 person and all 3 bedroom homes are min 5 person to avoid the provision of small houses. Noted, however the size and mix of homes is the prerogative of housing providers to decide and the space standards will prevent the provision of houses that are too small for occupancy.*
- 4.117 Minimum garden sizes of say 25m² should be specified for houses. Noted and Part 3 has been amended to clarify that gardens are to be of sufficient size which it is to be expected to be to client and or planning requirements.*
- 4.118 It would be beneficial to retain the reasonable requirement for tumble dryers to be positioned so that they can ventilated externally. Understood, however we specify minimum standards and encourage the use of best practice. Housing providers and their professional advisors are encouraged to develop good design solutions to meet local requirements such as clothes drying requirements. The standard purposefully omits this level of prescriptive requirement to encourage innovative solutions and best practice.*
- 4.119 Recommendation that carbon monoxide detectors should be hard wired with battery back-up. This resulted in additional building safety requirements in part 3.*
- 4.120 Concerns that too many dwellings are currently under construction that use fossil fuels. Noted and the standard is amended to include a revised energy section with requirements to achieve an EPC A energy rating (SAP92 or greater) through a minimum fabric standard and without the use of fossil fuel boilers. However, so as not to discourage high quality low carbon design solutions such as the Passivhaus standard, alternative proposals to EPC A and non fossil fuel fired boilers will be acceptable where it can be demonstrated by independent certification that the building's energy demand is reduced in accordance with the Energy Hierarchy for Planning in Welsh Government's Planning Policy Wales.*
- 4.121 Consider rewording the reference to "minimum" space to "optimal" spaces to encourage designers to create larger spaces. This resulted in the omission of the word "minimum" from the Appendix A title.*
- 4.122 Suggest that floor areas should follow NDSS in England. It is noted that well designed, space efficient homes can be achieved in different footprints than is proposed in the minimum space standards, therefore flexibility has been introduced to address the concern and to further align with the NDSS.*
- 4.123 Suggestion that the standard should make reference to and clearly link with other appropriate guidance/strategies and an opportunity to reference the role of tenants and the wider community during the design. The new standard is one of many policy documents that form a suite of standards that fulfil the wider Welsh Government quality agenda and it is not considered necessary to cross reference all policy matters. Amendments have been made to the preface to reference community engagement and policy.*

- 4.124 Consider embedding Home Buyer Reports and the International Property Measurement Standards (IPMS) within the policy. *Noted but not considered necessary for setting quality standards.*
- 4.125 Improvements to health and wellbeing should be included as one of the main requirements of the BHS. *This resulted in an amended Preface.*
- 4.126 Very little mention of external spaces is made and the introduction should make explicit reference to the placemaking agenda. Private garden space is crucial for WG placemaking and wellbeing aims and has been brought even more into focus by the COVID 19 pandemic impact on people. *This resulted in amendments to the wording of the preface and Part 3 of the standard.*
- 4.127 The standard is too subjective, too open to interpretation. *Noted however, the standard sets out the vision and leaves the responsibility for achieving high quality in the hands of housing providers who must (by the use of best practice) set their own quality agenda and is simplified as advocated by the Independent Review of Affordable Housing Supply 2019.*
- 4.128 Suggestion that the policy sets out wheelchair accessibility standards including special needs such as bariatric/adapted property size and specification. *We acknowledge these concerns but the standard is written for general needs and it is considered that the adoption of the Lifetime Homes Standard fulfils the obligation to provide accessible homes for future needs. Wheelchair and other special need provision is outside the scope of this standard.*
- 4.129 It would be advantageous to include specific reference to supporting the Foundational Economy. *Noted, however housing is a key element in the Foundation Economy and the standard does not therefore need to make reference.*
- 4.130 Promote the integration of S106 properties into estates. *Concerns about tenure mix noted however the provision is in the hands of the Local Authority and housing providers.*
- 4.131 Diagrams would be helpful to illustrate different circumstances and “reasonable” standards. *Noted, however such guidance is readily available in other best practice design guidance and policies and not considered necessary for inclusion in the standard which sets out the vision and leaves the responsibility for achieving high quality in the hands of housing providers.*
- 4.132 The Secured by Design standard is not helpful, particularly as security is now included in Part Q of the Building Regulations. *Noted but the specified level of compliance exceeds part Q, notably the estate wide elements.*
- 4.133 The proposals make no reference to the Welsh Housing Quality Standard (WHQS). *Noted, however the WHQS is not a new build standard and reference to WHQS within the new build standard is not therefore appropriate.*

4.134 Question 6 (Q6):

“Do you agree or disagree that it is important for all affordable homes delivered through section 106 agreements and planning conditions to meet the proposed quality standards for new homes? If you disagree, please tell us why”

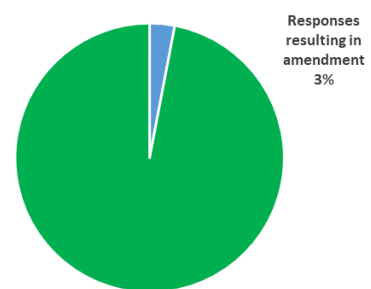
4.135 Sixty three responses were received to the question, of which 3% were considered to have high impact, 29% of medium impact and 68% of no impact.



4.136 Although there was broad support for the policy, 5% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.137 The percentages of high and medium impact, combined with the 5% concern challenging the policy resulted in 3% of the responses effecting a material change to the proposed standard.

Q6 Amendments to standard



4.138 Question 6 response themes, summaries and commentary

4.139 The word 'affordable' needs to be revised to cater for expensive developments where affordable housing of the same dimensions and qualities are being provided where the price of the affordable element may be less but not really affordable. *Noted, however the current Welsh Government definition of 'affordable housing' set out in TAN 2 is widely accepted and in the scenario suggested, an affordable housing contribution could be delivered on an alternative site or as a commuted sum.*

4.140 Agreement that there is a great demand for affordable housing which should not be at a lesser standard when delivered under s106 agreements. *Noted.*

4.141 Agreement that there are clear benefits of applying the new policy to Section 106 properties. However, it may be a challenge for some developers to build to these standards which may put them off from developing in Wales or reduce the number of affordable homes delivered through this route. *Concerns about supply noted, however the standard responds to the Welsh Government direction of travel to deliver high quality sustainable homes.*

4.142 It is recognised that a large proportion of the affordable homes in Wales are provided through S106 planning obligations and it is important that these new homes meet this standard. However, it is important that we make it easier for volume house builders to

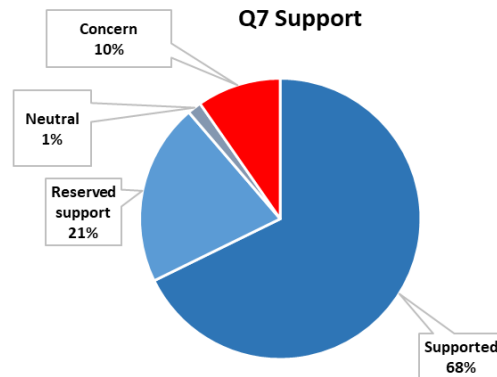
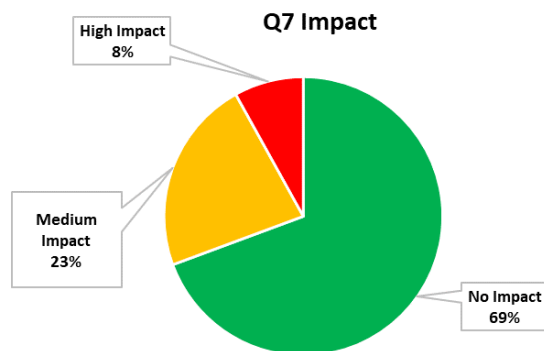
meet this standard and would suggest that the standard should incorporate the minimum floor areas from NDSS, rather than set a new, ever so slightly different standard. *Noted, however the standard closely aligns with the English National Described Space Standard, reflecting the Welsh context, notably futureproofing. The standard has been amended to introduce flexibility to further align with the NDSS standard.*

- 4.143 Concern about the adverse effects of increasing space standards, viability, decreased affordability of housing products that support home ownership, reduced delivery of the quantity of homes (private and affordable) due to decreased densities, inability to achieve the aspirations of the place making agenda and a call for a more flexible approach to affordable housing delivery. *The viability concerns are recognised, but although increasing the delivery of affordable homes is important, ensuring that all affordable homes are built to the same quality standards is also important. Flexibility for different affordable housing tenures is not considered appropriate as this would undermine the goal of achieving consistency in standards and could lead to certain tenures being preferred on cost grounds rather than on the basis of evidence of need. Increasing densities of housing where appropriate is only one aspect of the 'place-making' agenda; improving the quality of the homes provided is also important.*

4.144 Question 7 (Q7):

“What is your opinion on the intention to adopt the proposed new policy for all housing irrespective of tenure. Please explain and provide evidence for your views”

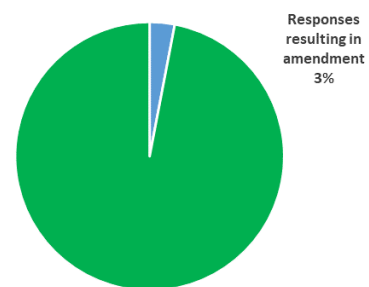
4.145 Sixty two responses were received to the question, of which 8% were considered to have high impact, 23% of medium impact and 69% of no impact.



4.146 Although there was broad support for the policy, 10% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.147 The percentages of high and medium impact, combined with the 10% concern challenging the policy resulted in 3% of the responses effecting a material change to the proposed standard.

Q7 Amendments to standard



4.148 Question 7 response themes, summaries and commentary

4.149 Agreement that without this standardisation there would be commercial pressure to reduce space standards. *Noted.*

4.150 There may be room in the market for houses being built smaller than the proposed standards for first time buyers. *Noted, however this does not follow the direction of travel for housing quality, as advocated by the Independent Review of Affordable Housing Supply 2019*

4.151 Concern for a sufficiently robust mechanism by which to ensure the compliance. *Noted and to be considered as future policy evolves.*

4.152 Supported as we need sustainable housing which takes into account the environment, and provides for our future generations. *Noted.*

4.153 Difficulties alongside competition for land, potential additional costs impacting on house owners and that mass market suppliers might leave Wales. *Noted, however the standard responds to the Welsh Government direction of travel to deliver high quality sustainable homes.*

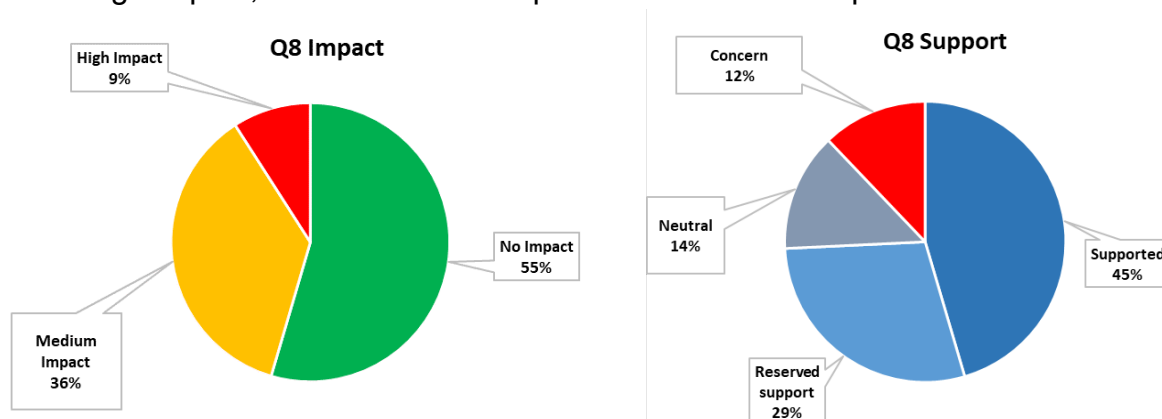
4.154 Support for the standardisation of requirements across all tenures but this would be best achieved through Building Regulations. *Noted and to be considered as future policy evolves.*

- 4.155 Developers should be encouraged to go above and beyond minimum standards set by building regulation. *Noted, which is why the standard sets increased requirements for sustainability and energy performance.*
- 4.156 Support to adopt the proposed new policy for all housing irrespective of tenure because the Equality and Human Rights Commission has found that there is a “significant undersupply of accessible housing” in Wales, and recommended in 2018 that “if all new homes in Wales were built to the Development Quality Requirements, which meet the Lifetime Homes Standard, it would mean that the new housing stock in Wales would be futureproofed and adaptable to meet the changing needs of disabled people.” *Noted.*
- 4.157 Concern that applying this new standard to affordable homes only will impact on the ability for the affordable housing suppliers to be competitive. There is support for a ‘single standard’ for all new homes, with more consideration to improve placemaking, design quality, sustainability/innovation, and carbon reduction but it is important to recognise that a single standard must not be too arduous, as it could put volume house builders off developing in Wales, which could have a significant impact on housing supply. It is suggest that if a single new standard is to be applied to all homes, regardless of tenure, this should be similar to the NDSS in England. *Concerns noted and the standard has been amended introducing flexibility to further align with the English National Described Space Standard, but reflecting the Welsh context, notably futureproofing.*
- 4.158 Homes built to different standards create their own inequalities between people within communities; standards should exist to ensure quality of experience for all, regardless of whether homes are for sale or rent. *Noted*
- 4.159 Agreement that by adopting the standard across all housing tenures will have a greater beneficial impact for innovative building approaches like Modern Methods of Construction. Demand aggregation, coupled with standardisation will bring down manufacturing costs of raw materials and simplify the administrative process for industry. Restricting the standard to certain types of tenure only exacerbates the disparity in living conditions between social housing, the private rented sector and owner occupiers, and a broader application to all housing should mitigate this. *Noted*

4.160 Question 8 (Q8):

“What is your opinion of the proposed minimum space standard. Please explain and provide evidence for your views”

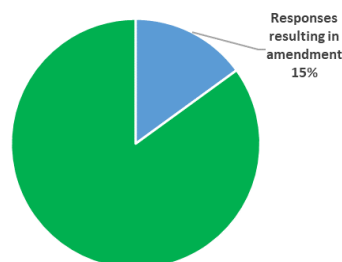
4.161 Sixty six responses were received to the question, of which 9% were considered to have high impact, 36% of medium impact and 55% of no impact.



4.162 Although there was broad support for the policy, 12% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.163 The percentages of high and medium impact, combined with the 12% concern challenging the policy resulted in 15% of the responses effecting a material change to the proposed standard.

Q8 Amendments to standard



4.164 Question 8 response themes, summaries and commentary

4.165 Great idea but care must be taken over the impact on the environment or the ability of the authority to comply with their building obligations in terms of numbers when land is in short supply. Concern also that the impact of introducing these requirements would alter the mix of housing to sites predominantly consisting 4+ bedroom homes.

Concerns noted, however the standard responds to the Welsh Government direction of travel to deliver high quality sustainable homes.

4.166 Additional living space should be provided to allow for an office room rather than office space, to enable working from home. *Noted, however the standard requires sufficient space for occupants to “set up a home office in a suitable room to allow home working”. The decision on the suitable space must be made by the housing provider.*

4.167 Concerns about the space of Bungalows. *Noted, however we specify minimum standards and encourage the use of best practice. Housing providers and their professional advisors are encouraged to develop good design solutions to meet local requirements.*

4.168 It is a positive requirement and the inclusion of specified storage space is also helpful. Appendix A sets out clearly what is needed for space requirements to be met such as the Lifetime Home Standards to meet current and future accessibility requirements. *Noted*

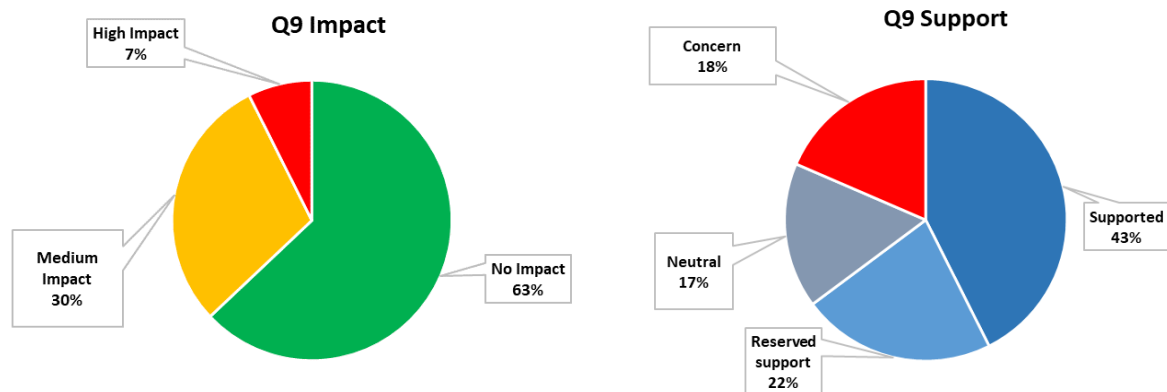
- 4.169 New builds seem to decrease in size every year with a complete lack of thought for storage space, clothes drying or recycling needs. *Noted and which is one of the reasons why the space standard is being introduced.*
- 4.170 Space standards should be based on research proportionate to the benefit; achieving parity on standards with that of other UK administrations wherever possible. *Noted and which is why the standard has been amended to more closely align with the English NDSS.*
- 4.171 The focus on space throughout this new standard is welcomed. The considerations of what tenants' deemed important during the Affordable Housing Review has been considered and in the most part suggested within this proposal. When considering the COVID-19 pandemic and people working from home, the space standards provide the necessary flexibility for tenants. *Noted.*
- 4.172 Belief that new homes in Wales must be built with the future of generations at their core and that minimum space requirements must consider the need for homes to be adaptable for future needs. *Noted, which is why the policy promotes the Lifetime Homes standard (LTH).*
- 4.173 Critical room dimensions should be extended to consider the dimensions of walkways, stairs and doors within the home to allow ease of mobility around the home. *Noted, however critical dimensions are governed by building regulations in conjunction with the LTH standard.*
- 4.174 Good practice guidelines should be explicitly referenced to play a more upfront and centre role in the updated Standards. *Noted however the simplified approach to the wording of the standard is as advocated by the Independent Review of Affordable Housing Supply 2019.*
- 4.175 Suggestion for flexibility over the space standards to give social landlords more opportunity to build homes that suit the communities in which they are located. *Noted, which is why the standard has been re worded to introduce an element of flexibility.*
- 4.176 Objection on four counts, firstly to the proposed increase in size of new dwellings and the associated increase in the cost to build the property which will be reflected in the sales price leading to an affordability issues particularly for first time buyers. Secondly because the proposed increases in house sizes are larger on the smaller two and three bed properties which are most commonly purchased by first time buyers and where the purchase price is likely to be a greater factor. Thirdly because the increase in house sizes will also result in a reduction in site coverage and finally that the proposed sizes differ slightly to those currently suggested in England which creates an issue for national house builders and some larger SME's who operate across the border resulting in them having to have two different house ranges. *Noted, however the standard responds to the Welsh Government direction of travel to deliver high quality sustainable homes. The standard has however been amended to introduce flexibility and to remove the word minimum from the Appendix title to further align with the English National Described Space Standard.*
- 4.177 Children expressed views that the future space standards need to make sure that children's bedrooms especially are of a good size, together with making bathrooms and kitchens a reasonable size for family use. *Noted and reflected in the standards.*
- 4.178 Recommendation to expand the guidance to define the minimum spacing for three-story developments. *Noted, however the standard does not accommodate all house type variations where the responsibility for providing high quality bespoke homes must remain in the hands of the housing provider.*

- 4.179 3rd column title should be amended to: Gross Internal (floor) Area (GIA) m². *Agreed and amended.*
- 4.180 A comprehensive assessment should be undertaken of the viability of compliance with LTH against the proposed minimum space standard in consultation with an inclusive design expert with detailed technical knowledge of the standard. *Noted, however the Lifetime Homes has been developed by Habinteg and it is therefore not considered necessary to consult further.*

4.181 Question 9 (Q9):

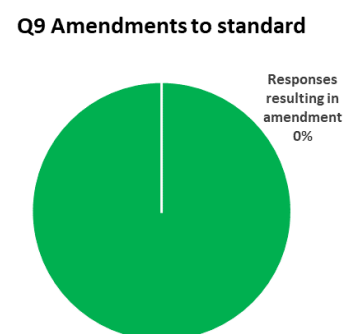
“With the exception of the Lifetime Homes requirements, the proposed new policy is not prescriptive in relation to inclusivity and notably such matters as, disability, ethnicity, gender, sexual orientation, age, religion, human rights or children’s rights. Do you consider that the proposed new policy is sufficiently inclusive or not. Please explain and provide evidence for your views”

4.182 Fifty four responses were received to the question, of which 7% were considered to have high impact, 30% of medium impact and 63% of no impact.



4.183 Although there was broad support for the policy, 18% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.184 The percentages of high and medium impact, combined with the 18% concern challenging the policy resulted in 0% of the responses effecting a material change to the proposed standard.



4.185 Question 9 response themes, summaries and commentary

4.186 Agreement for the present time but for the wellbeing of future generations, future standards could consider a requirement for outside space, even if this is only a balcony. Likewise, there were very clear children’s views about how the new policy and space standards can be made good for children. They want new houses to be big, with a big garden, to feel and look special, and to have large bedrooms. In addition children would like a playroom (or “toy room”) for indoor play – as well as having a garden big enough for outdoor play. *This comment supports a case for specifying space standards and resulted in rewording of the standard to clarify that gardens are to be of sufficient size and that consideration should also be given to the provision of private or communal amenity space to flats.*

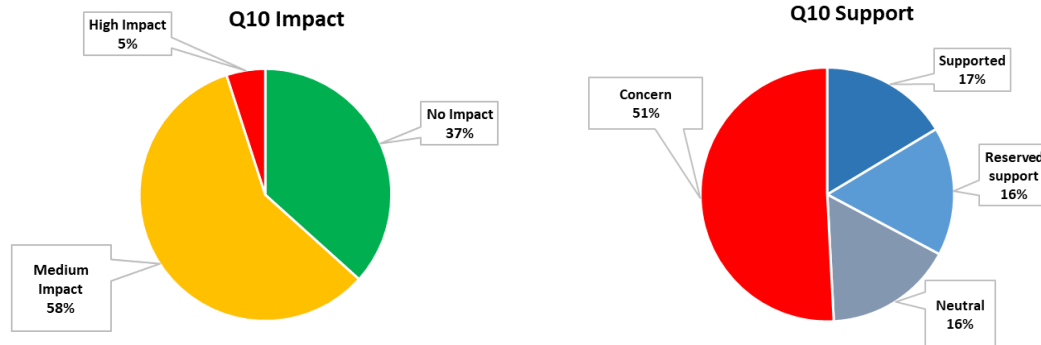
4.187 There is a lack of consideration for space in regards to bungalows which needs to be rectified. *Noted, however we specify minimum standards and encourage the use of best practice. Housing providers and their professional advisors are encouraged to develop good design solutions to meet local requirements.*

- 4.188 Concern that the proposed standard does not include digital infrastructure which we feel is important to support inclusivity. *Noted and we have added broadband connectivity requirements to the standard.*
- 4.189 Concern that the policy should reference the Well-Being of Future Generations Act and other legislation such as the Equality Act and the Equality Duty and could be better informed by and better reflect commitment to inclusion, equalities, and diversity. *Noted however the standard is one of many policy documents that form a suite of standards that fulfil the wider Welsh Government quality agenda and it is not considered necessary to cross reference all policy matters. An Interactive Risk Assessment was undertaken prior to drafting the policy which duly considered matters of equality and diversity.*
- 4.190 Accessibility will help ensure older people remain connected in their homes, and live their lives to meet their own life choices, and have the opportunity to take part in their wider community, and live with dignity and independence in their own homes. *Noted, which is why the Lifetime Homes standard is adopted.*
- 4.191 There is a valid question about what to do for the minority of households which require specialist accommodation above and beyond that specified in Lifetime Homes. *Noted, however the standard is written for general needs accommodation and does not preclude designing for a range of accommodation, including special needs to meet client requirements.*
- 4.192 Concern about the lack of reference to the RNIB standards in the new document. *Noted, however the standard leaves the responsibility for achieving high quality housing in the hands of housing providers who are expected to (by the use of best practice), set their own quality agenda on such matters.*
- 4.193 The provision of all affordable homes being either fitted or able to be fitted with full disabled access is expensive and unnecessary. *Noted, however there is not a requirement for full disabled access. Lifetime Homes is considered to be a reasonable provision for accessibility and housing providers will design special accommodation for special needs such as full wheelchair access.*
- 4.194 Opinion that the policy is considered to be sufficiently inclusive and sufficiently flexible for housing providers to provide for all society groups. *Noted.*
- 4.195 Suggestion that Welsh Government may want to consider the ability of s106 affordable homes to deliver something bespoke in relation to a specific local housing need as determined by the local authority. *Noted, however Local Authorities already have a duty to provide for such accommodation through the planning process.*
- 4.196 Recommendation that the document to make reference to culturally appropriate design. *Noted and Preface re-worded accordingly.*

4.197 Question 10 (Q10):

“We are proposing to change the name of DQR to “Beautiful Homes and Spaces” (BHS). What is your opinion of the proposed name change and do you have an alternative suggestion”

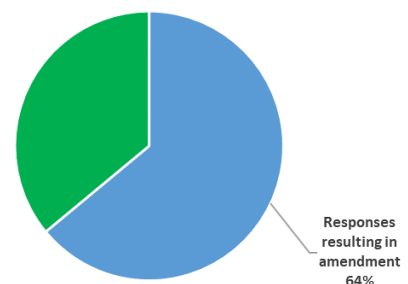
4.198 Sixty one responses were received to the question, of which 5% were considered to have high impact, 58% of medium impact and 37% of no impact.



4.199 Although there was broad support for the policy, 51% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.200 The percentages of high and medium impact, combined with the 51% concern challenging the policy resulted in 64% of the responses effecting a material change to the proposed standard.

Q10 Amendments to standard



4.201 Question 10 response themes, summaries and commentary

4.202 Concern about subjective naming convention. *Noted.*

4.203 Concern that the name lacks gravitas. *Noted.*

4.204 Disagreement because the policy has nothing to do with 'beauty'. *Noted.*

4.205 Development Quality Requirements (DQR) is well known by people in many professions and no need for a name change, just change the standards. *Noted.*

4.206 Although the proposed name is well presented and will no doubt be well received, it does not feel as authoritative as “Development Quality Requirements”. The key message in “Beautiful Homes and Spaces” is about innovation and sustainability, and the future aspect of this message needs to be reflected in the title. At the moment the new name feels more like a lifestyle recommendation. *Noted.*

4.207 Support for the name change as it moves away from what could be perceived as a purely a “technical standard” and embraces place making principles. *Noted.*

4.208 The name suggested is quite awful, it sounds more like a glossy DIY/Home Owners magazine in a newsagent rather than a Government Standard. *Noted.*

4.209 The change of name from DQR to BHS will signify a clear change from a previous set of standards however the name Design Quality Requirements better reflects the proposals which are still primarily focused on good design and good quality homes.

Noted

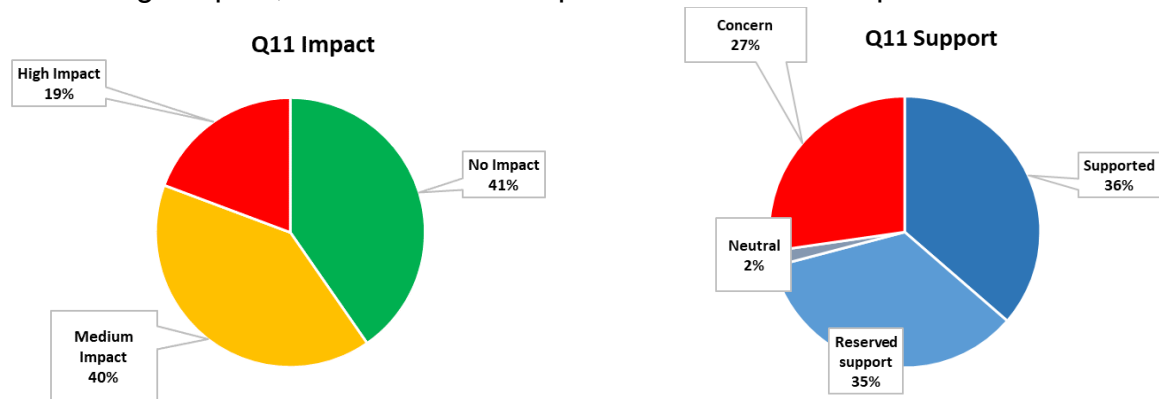
4.210 There was a clear message from children to the Government on designing beauty into a house and garden. *Noted*.

4.211 Opinion that it would be better to keep the original wording because everyone is aware of what it refers to and the quality aspect ought not to be removed. *Noted*.

4.212 Question 11 (Q11):

“Subject to the outcome of the consultation on changes to the Building Regulations Part L (conservation of fuel and power) and Part F (overheating), new regulations will come into force. What is your opinion of the potential early introduction of the conservation of fuel and power and overheating regulations for new affordable housing in advance of any building regulation transitional arrangements? ”

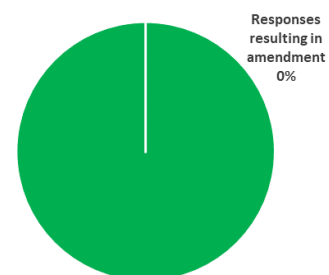
4.213 Fifty seven responses were received to the question, of which 19% were considered to have high impact, 40% of medium impact and 41% of no impact.



4.214 Although there was broad support for the policy, 27% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.215 The percentages of high and medium impact, combined with the 27% concern challenging the policy resulted in 0% of the responses effecting a material change to the proposed standard.

Q11 Amendments to standard



4.216 Question 11 response themes, summaries and commentary

4.217 Agreement due to climate change and the need to act and that Welsh Government housing standards should lead the way by being at “the cutting edge” and to begin the process of “future proofing” as soon as possible. *Noted*

4.218 Suggestion to implement without transitional arrangements, however there are concerns about enforcement. *Noted*

4.219 Opinion that there is no additional benefit in bringing forward Part L implementation for affordable housing. Rushing implementation could create safety and quality issues. The new proposals in Part L are already tough, are due for implementation soon, and the sector will need to time to prepare. *Noted*

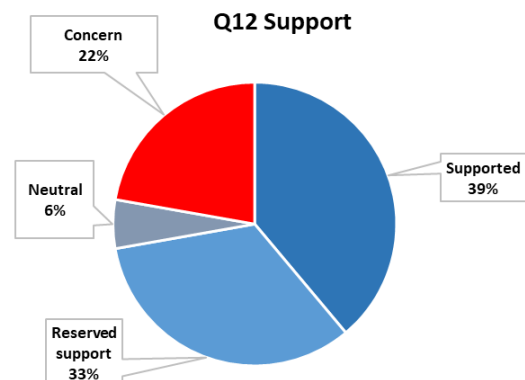
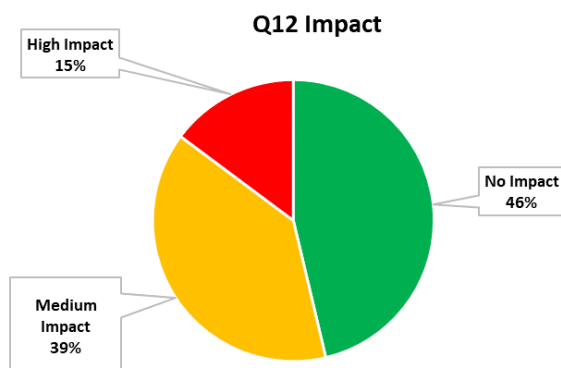
4.220 Disagreement with the early application of anticipated changes to building regulations to affordable homes. The regulations which are in force should be applied consistently to all developments to avoid confusion. In any event, this isn’t actually mentioned in the draft standards document and to put something so specific in it seems to fly in the face of the principle of simplification. *Noted*

- 4.221 Concerns about the cost effect and subsequent impact upon project viability noted and that additional costs should be recognised in the grant system. *Noted*
- 4.222 Concern that early implementation of the regulations would need to be consulted on separately. *Noted*
- 4.223 Early adoption, although a positive step forward, will only be successful if the market is ready in terms of sourcing materials and skilled labour to produce and install the energy measures/technologies required. At present there is considered to be a lack of locally based suppliers and a skills gap for installation and maintenance of new energy technologies. *Noted*
- 4.224 Belief that it would be more beneficial and practical to wait for building regulation transitional arrangements. Early introduction of the conservation of fuel and power and overheating regulations for new affordable housing in advance of any building regulation transitional arrangements would run the risk of unnecessary increased costs if there was to be any subsequent unexpected change to building regulations. *Noted*.

4.225 Question 12 (Q12):

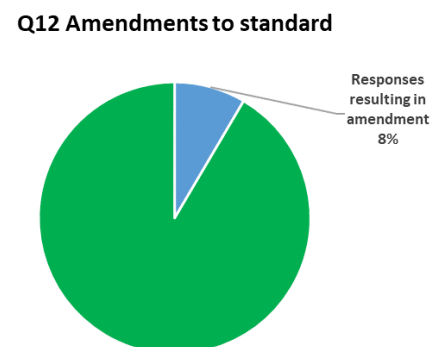
“What is your opinion on the potential introduction of a requirement that all new affordable housing should meet EPC A (SAP 92)”

4.226 Fifty four responses were received to the question, of which 15% were considered to have high impact, 39% of medium impact and 46% of no impact.



4.227 Although there was broad support for the policy, 22% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.228 The percentages of high and medium impact, combined with the 22% concern challenging the policy resulted in 8% of the responses effecting a material change to the proposed standard.



4.229 Question 12 response themes, summaries and commentary

4.230 Concern that EPC ratings are useless because they don't recognise the way people live in their homes. *Noted, however an energy rating of EPC A will have a positive effect on regulated fuel bill reductions although it is accepted that householders will still need to manage fuel use. Which is why the standard has been amended to introduce improvements in the building fabric to assist energy conservation.*

4.231 Strong agreement and a welcomed introduction because it is a straightforward and cost effective standard to reach, however increased costs will need to be recognised. *Noted*

4.232 Opinion that all new housing across the board should be built to this increased standard to tackle climate change, minimise financial hardship of occupiers and improve the health and wellbeing of the occupants. *Noted*

4.233 Tenants must be involved in these conversations to ensure they can operate the necessary technology used in new affordable housing. *Noted*

4.234 Disagreement to the adoption of a target EPC A rating for achieving sustainable homes because an EPC A rating target results in homes that miss some of the most fundamental credentials of achieving a truly sustainable home and recommendations that early site analysis considerations, resulting in a fabric first approach, and a strong environmental strategy would be much more effective than EPC A. *Noted and why the*

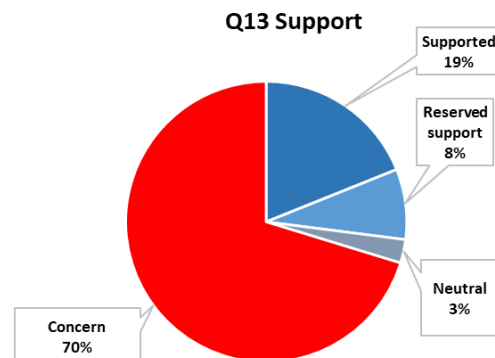
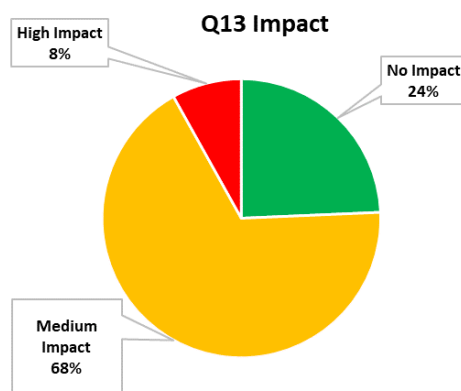
standard has been amended to introduce improvements in the building fabric and to facilitate alternative solutions through energy modelling and reducing energy demand in accordance with the Energy Hierarchy for Planning in Welsh Government's Planning Policy Wales.

- 4.235 Agreement in principle that EPC A is an appropriate standard to meet the carbon reduction targets as set out in the Environment (Wales) Act 2016, and the more recent commitment made by the Welsh Government to reduce carbon emissions by 95% by 2050. However, there is much work to be done to engage with the people who will live in homes with these standards about their expectations and the technology required to meet the standards. *Noted*
- 4.236 Uncertainty expressed about the rationale for introducing a minimum EPC score above the requirements in the Part L consultation and opinion that changes to the Building Regulations are the best place for such regulation. *Noted, however the building regulations by themselves do not include cost metrics which is why EPC A was considered to be a more appropriate measure by the Independent Review of Affordable Housing Supply 2019.*
- 4.237 Statement that EPC A doesn't necessarily mean decarbonisation although it is good to have a target figure for EPC's. *Noted*
- 4.238 Concern about achieving the standard for refurbishment projects noted, however the standard allows for flexibility. *Noted*
- 4.239 Opinion that organisations seeking to drive improvements in energy efficiency should use space heating demand as the primary metric, in order to drive the sector towards buildings which are affordable, highly energy efficient and low in emissions. *Noted and why the standard has been amended to introduce improvements in the building fabric and to facilitate alternative solutions through energy modelling and reducing energy demand in accordance with the Energy Hierarchy for Planning in Welsh Government's Planning Policy Wales. However, carbon targets such as upfront carbon, embodied carbon, space heating demand and total energy use intensity metrics have not been set at this time, leaving the sector to set targets in line with climate change commitments in the future.*

4.240 Question 13 (Q13):

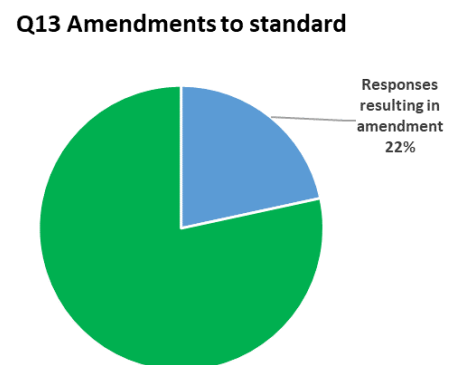
“We have asked a number of questions. We would welcome any other views you may have about the proposed new policy and the proposals for implementation”

4.241 Thirty seven responses were received to the question, of which 8% were considered to have high impact, 68% of medium impact and 24% of no impact.



4.242 Although there was broad support for the policy, 70% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.243 The percentages of high and medium impact, combined with the 70% concern challenging the policy resulted in 22% of the responses effecting a material change to the proposed standard.



4.244 Question 13 response themes, summaries and commentary

4.245 Quality Affordable housing for older people would ensure they live independently and well for longer and therefore be able to contribute more to the community and their families as volunteers. Anxiety and costs related to problems to do with old housing should be firmly acknowledged in development policy. *We acknowledge these concerns but feel that the adoption of the Lifetime Homes Standard fulfils the obligation.*

4.246 The standard needs to be tied into green infrastructure requirements and sustainable drainage approval. *Noted, however the standard is one of many policy documents that form a suite of standards that fulfil the wider Welsh Government quality agenda and it is not considered necessary to cross reference all policy matters. The introduction has however been amended to reference ecological sustainability and community values.*

4.247 Other sustainability policy should also be considered such as the monitoring of energy performance as is best practice in the GLA area, and standard policy in the London Borough of Ealing (Policy 5.2.3). *Noted, and this has resulted in amendment to the standard suggesting as-built assessment of whole life carbon and post occupancy evaluation of the building's performance in relation to the design intent.*

4.248 Support for the introduction of the new standard to coincide with the new grant process. *Noted.*

- 4.249 Innovation, MMC, minimum size standards, low carbon and high quality design will all affect the cost of development. *Concerns about costs noted, however the standard responds to the Welsh Government direction of travel to deliver high quality sustainable homes.*
- 4.250 There is some concern that Requirement 1 is too vague and could be a little more prescriptive. In particular it could be construed as a drive to use low standard/ cheaper products in order to increase value for money and could be strengthened to provide increased requirement and not just suggestions. We would suggest the removal of the term value for money from this statement. In place perhaps "The analysis of viability for scheme delivery should include a whole life cost analysis, assessing future maintenance and running costs along with carbon and energy savings in addition to capital cost". *Noted, but we would not agree that the wording encourages cheaper products. The sustainability, net zero carbon and circular economy section has been re-worded following advice to provide alignment with policies that are driving Wales to a net zero carbon future.*
- 4.251 Concern that there appears to be no provisions relating to safety. Fire safety is, of course an extremely important area to cover. Structural and electrical safety are also areas that we might expect to see included in the standard. *This resulted in additional requirements being added to Part 3.*
- 4.252 There has potentially been a missed opportunity to consult tenants specifically on this proposed framework. *Noted, however there have been several tiers of consultation associated with the drafting of the standard, including two major affordable housing reviews and informal sector consultations in addition to this consultation which was open to the public.*
- 4.253 The document should lead with the themes of carbon reduction, and placemaking, and use both strands to explain the rationale for other elements. Also, the document as currently drafted does not refer to blue/green infrastructure, or SUDS requirements. These should be considered early in the design process along with biodiversity. *This resulted in amendments to the Preface.*
- 4.254 North-facing single aspect dwellings are unacceptable. *Noted, however other primary government policy drives design requirements for housing and the new standard sits alongside these drivers to encourage better outcomes for social housing. It would not be practicable to be specific about orientation as is suggested.*
- 4.255 Sustainable developments should have specific energy and carbon reduction targets, set out in their environmental strategies to account for and facilitate the necessary monitoring and performance assessment. A whole life carbon cost analysis would also be beneficial. *Noted, and the sustainability, net zero carbon and circular economy section has been re-worded to provide alignment with policies that are driving Wales to a net zero carbon future.*
- 4.256 Strong recommendation to adopt standards for embodied carbon (kg/m²/yr) and operational energy (energy use intensity – kWh/m²/yr) which are based on robust research and experience, such as from the London Energy Transformation Initiative (LETI), UK Green Building Council, Passivhaus Trust and Energiesprong UK (based on their global experience). *Noted, however carbon targets such as upfront carbon, embodied carbon, space heating demand and total energy use intensity metrics have not been set at this time, leaving the sector to set targets in line with climate change commitments in the future.*

- 4.257 It is considered to be very important that cars should be accessible for people who are frail or disabled. However, car parking should not be allowed to dominate the street-scene, particularly where this may reduce safety for young children, or pedestrians in general. *Noted, however parking provision is primarily driven by Local Authority Planning policy requirements.*
- 4.258 MMC are not an end in themselves. There is continuing debate over whether there will be long-term cost savings from using MMC. In this situation, we need to be certain that using any technological advances which are of benefit to the occupiers and to the environment, whether or not they are a 'step-change' compared with brick/block/cavity construction. We must have thorough, publicly-available evaluation of any modern method of construction that is used, so that unsuitable methods are not continued. *Concerns noted.*
- 4.259 Carbon neutrality doesn't appear to be part of this consultation. *Noted and the sustainability, net zero carbon and circular economy section has been re-worded to provide alignment with policies that are driving Wales to a net zero carbon future.*
- 4.260 In order to achieve a successful implementation in respect of the provision of affordable housing via Planning Agreements there must be a clear policy context (LDP/Supplementary Planning Guidance) and consequential amendments to the current Building Regulations. *Planning policy amendments will address the concerns.*
- 4.261 Concern that to achieve the best quality and space standards the process needs careful monitoring. *Noted, however the standard sets out the vision and leaves the responsibility for achieving high quality in the hands of housing providers who must (by the use of best practice) set their own quality agenda.*
- 4.262 The BHS Schedules no mention is made of sprinkler systems which can present difficulties with their integration into a domestic dwelling at reasonable cost especially when servicing apartment blocks. *Noted, however sprinklers are already mandatory.*
- 4.263 It would be beneficial for the new standards to acknowledge the applicability of special need standards either on the whole or in particular cases where there is an exception or specific requirement. *Noted, however the standard sets out the vision for general need housing and leaves the responsibility for achieving high quality in the hands of housing providers who must (by the use of best practice) set their own quality agenda, particularly for other housing need.*
- 4.264 Definition of affordable housing – not linked correctly Page 1. *The definition of affordable housing reference is corrected.*
- 4.265 The preface of the previously proposed standards from 2016 referred to the Housing (Wales) Act 2014, Part 4 as to where these standards are contained in legislation. It also stated the standards existed to protect public investment in social housing providers in Wales and safeguards the interests of their tenants. Providing this information within the new standards document would be useful context to clarify the legal underpinning and purpose. *Noted, however the standard is one of many policy documents that form a suite of standards that fulfil the wider Welsh Government quality agenda and it is not considered necessary to cross reference all policy matters or regulations.*
- 4.266 Generally, the standards document should include a thorough and clear introduction that states the purpose of the standards, who and what the standards apply to and do not apply to, as well as acknowledging and distinguishing between other standards such as the Welsh Quality Housing Standard and Building Regulations. *Noted, however it is*

not considered necessary to reference building regulations or other standards such as WHQS which do not apply to new housing.

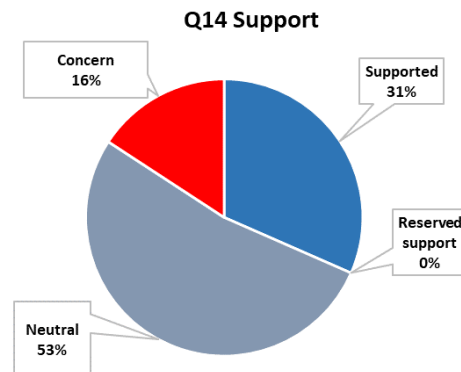
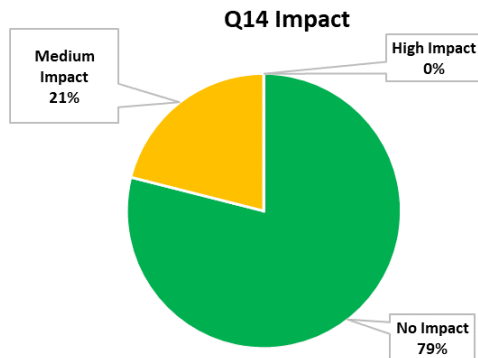
- 4.267 Concerns about the shortage of housing in both the private and public sectors due to planning policy issues. *Planning concerns are not part of this consultation, however concerns about supply noted.*
- 4.268 It is important to fully understand where and why there were failings in the DQR. Whilst the proposed new policy is welcomed, the implementation needs to be carefully designed, delivered and monitored in close partnership with industry, to ensure the issues identified in the 2019 Independent Review of Affordable Housing Supply do not reoccur with the new policy. *Recommendation noted, however it is the responsibility of housing providers to take responsibility for such requirements.*
- 4.269 Further information is required regarding the need to demonstrate compliance with any new policy requirement. *Housing providers will be expected to demonstrate compliance as part of the Welsh Government scrutiny assessment process. In situations where scrutiny may not apply, the standard sets out the vision and leaves the responsibility for achieving high quality in the hands of housing providers who must (by the use of best practice) set their own quality agenda.*
- 4.270 There is no reference to garden sizes or minimum standards outside of the home, additionally there is no reference to outside or neighbourhood play. *Noted, however the standard sets out the vision and leaves the responsibility for achieving high quality in the hands of housing providers who must (by the use of best practice) set their own quality agenda including such matters as external amenity which will also be governed by planning policy.*
- 4.271 Very limited link or reference to other related documents, such as PPW. *Noted, however the standard is one of many policy documents that form a suite of standards that fulfil the wider Welsh Government quality agenda and it is not considered necessary to cross reference all policy matters.*
- 4.272 With sustainable transport being an encouraged aim, surprised there is no mention of bike storage or electric charging points. *This resulted in an amendment to include a requirement for bike storage and consideration for sustainable travel.*
- 4.273 The document and its intention sends out mixed messages in applying items to affordable housing only and then indicating a general thought of applying to all new developments at some point. *Noted and the application of the standard to all tenures will be the subject of future policy review.*
- 4.274 Elements of the document are open to interpretation. *Noted, however interpretation of a flexible standard is intentional.*
- 4.275 How often will the document be reviewed to monitor its impacts and also changing circumstances? *Question noted and whilst the impact of the standard will be under constant review, the simplified nature of the standard will have less requirements for updating.*
- 4.276 Many intelligent heating systems are based upon internet connectivity. Will there be grants available either for tenants to link into broadband networks or capital grants for ultra-fast broadband? *Concerns about internet connectivity noted. Although this provision is a matter for other policy drivers, the standard is amended to recognise the requirements.*
- 4.277 Many authorities are now requesting external space such as balconies in flats. *This has resulted in the standard being revised to include for consideration to be given to the provision of private or communal amenity space to flats.*

- 4.278 Organisations would benefit from clarity and definitions for terms such as 'high quality' used throughout the document. *Noted, however the standard sets out the vision and leaves the responsibility for achieving high quality in the hands of housing providers who must (by the use of best practice) set their own quality agenda.*
- 4.279 There needs to be a recognition that these standards will potentially have an impact on land availability, viability and the number of units achieved. *Concerns about supply noted, however the standard responds to the Welsh Government direction of travel to deliver high quality sustainable homes.*
- 4.280 We need to define how we want new housing to perform once it's built with independent validation/certification and backed-up by Building Performance Evaluation as a regulated requirement. *Noted, and this has resulted in amendment to the standard suggesting as-built assessment of whole life carbon and post occupancy evaluation of the building's performance in relation to the design intent.*
- 4.281 There is no specific reference to car charging points. *Noted, however electric vehicle charging point provision will remain a matter for the housing provider.*
- 4.282 Whilst the proposals to build to new standards are welcomed, if they are implemented in isolation without a considered approach to behavioural and cultural changes, then any improvements could potentially be lost through misuse of technology/lack of buy in from the residents. *Concerns about behaviour change noted, however it is the responsibility of housing providers to provide such advice for example through the provision of effective home user guides.*

4.283 Question 14 (Q14):

“We would like to know your views on the effects that the proposed new policy would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favorably than English”

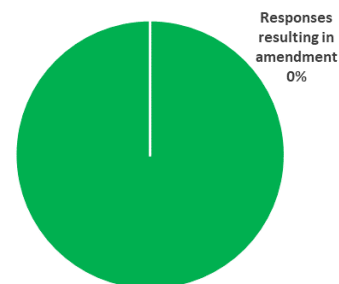
4.284 Nineteen responses were received to the question, of which 0% were considered to have high impact, 21% of medium impact and 79% of no impact.



4.285 Although there was broad support for the policy, 16% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.286 The percentages of high and medium impact, combined with the 16% concern challenging the policy resulted in 0% of the responses effecting a material change to the proposed standard.

Q14 Amendments to standard



4.287 Question 14 response themes, summaries and commentary

4.288 Social housing policy in particular undermines the strength of Welsh speaking communities (as reported by older and younger people) - proper meaningful risk assessments should be carried out in terms of the scale of developments in terms of location and social housing policy. *Noted, which is why a Welsh language impact assessment was undertaken.*

4.289 Use a more Welsh acronym than DQR. *Noted and the publication will be produced in both languages to enable alternate acronyms.*

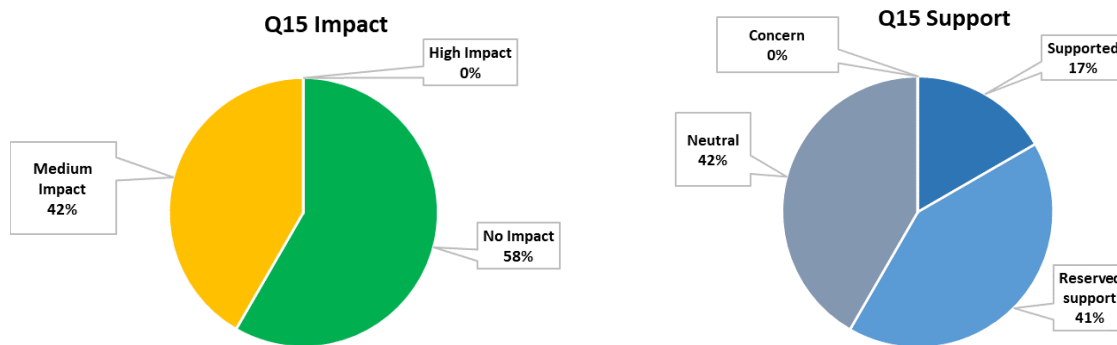
4.290 We don't consider the new policy will have any impact on the Welsh language, however bi-lingual versions should be made available. *Noted and actioned.*

4.291 If increased overheads lead to increased house prices, thereby excluding local people from the local housing market, there is the possibility that there will be a negative impact on Welsh language sensitive communities such as areas in Wrexham County Borough, which is bordered by more affluent English counties, such as Cheshire West and Shropshire. *Concerns about supply noted, however the standard responds to the Welsh Government direction of travel to deliver high quality sustainable homes.*

4.292 Question 15 (Q15):

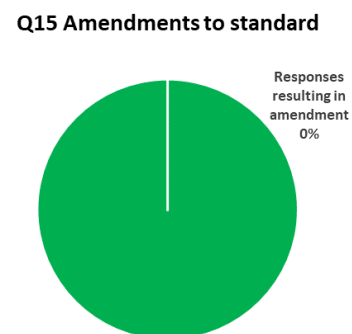
“Please also explain how you believe the proposed new policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language”

4.293 Twelve responses were received to the question, of which 0% were considered to have high impact, 42% of medium impact and 58% of no impact.



4.294 Although there was broad support for the policy, 0% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.295 The percentages of high and medium impact, combined with the 0% concern challenging the policy resulted in 0% of the responses effecting a material change to the proposed standard.



4.296 Question 15 response themes, summaries and commentary

4.297 Bring more Welsh MMC into the standards. *Noted, however the standard is purposely not prescriptive in identifying regional products to enable housing providers to make their own informed choices. The standard has however been amended to encourage maximising the efficient use of timber in construction to increase carbon storage in harvested wood products in Wales.*

4.298 The development of a north Wales and South Wales Construction Framework is positive and needs to be supported by all housing providers and Welsh Government. The use of these Frameworks will support the growth of Welsh businesses and strengthen our Welsh Communities during these difficult and challenging times. *Noted, however this is a procurement issue not covered by the housing quality standard.*

4.299 To add Welsh language road names to new developments as policy. *Noted*

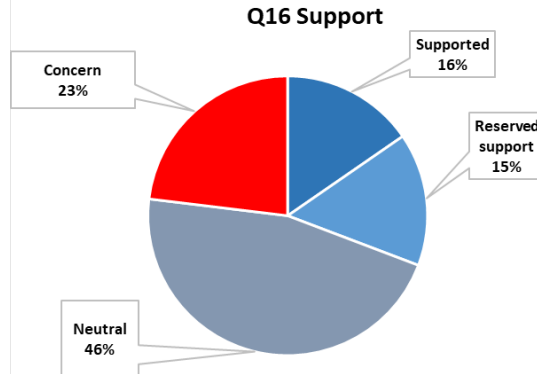
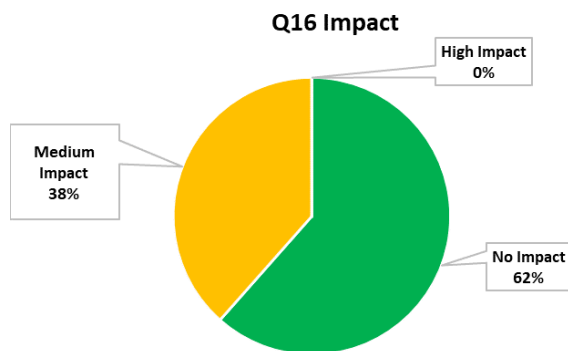
4.300 If it is proposed to change the name from DQR, perhaps a Welsh rather than an English name, would be preferable. It would give the standard a uniquely Welsh brand, thereby avoiding potential confusion with any initiatives, which may be introduced in

England. *Noted and the publication will be produced in both languages to enable alternate acronyms.*

4.301 Question 16 (Q16):

“We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them”

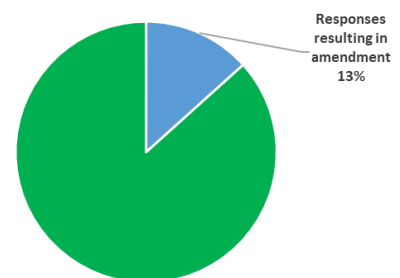
4.302 Twenty six responses were received to the question, of which 0% were considered to have high impact, 38% of medium impact and 62% of no impact.



4.303 Although there was broad support for the policy, 23% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.304 The percentages of high and medium impact, combined with the 23% concern challenging the policy resulted in 13% of the responses effecting a material change to the proposed standard.

Q16 Amendments to standard



4.305 Question 16 response themes, summaries and commentary

4.306 With more people working from home it is vital that future homes provide a suitable area within the home for working. *Noted and the space standard is intended to ensure that all new homes in Wales are fit for purpose now and in the future. It is for the housing provider to satisfy themselves that suitable home working provisions are met.*

4.307 Digital Infrastructure needed to support inclusivity and working from home. *This resulted in the standard being amended to reference broadband connectivity.*

4.308 Outside space is required for those who live in flats and do not have access to a garden, should consideration be given to reasonable sized communal space which is accessible to all. *Amenity space concerns noted, however we specify minimum standards and encourage the use of best practice. Housing providers and their professional advisors are encouraged to develop good design solutions to meet local requirements, particularly with regard to outside amenity space. Part 3f has however been amended to consider the provision of private or communal amenity space to flats.*

4.309 Reflecting cultural distinctiveness and richness is important. *Noted which resulted in an amended Preface.*

4.310 Whilst the new requirements are not nearly as prescriptive as DQR's, there are still some aspects which are quite specific e.g. space standards and Lifetime Homes Standards. We do have sites which are challenging to develop because of constraints

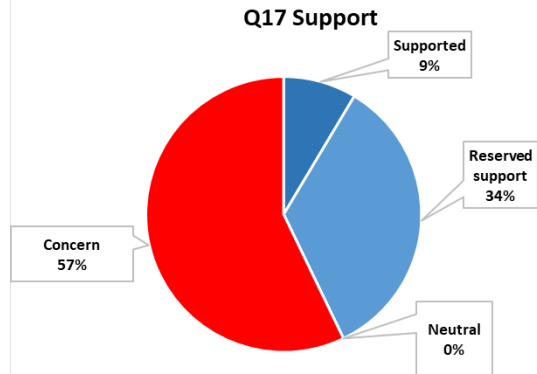
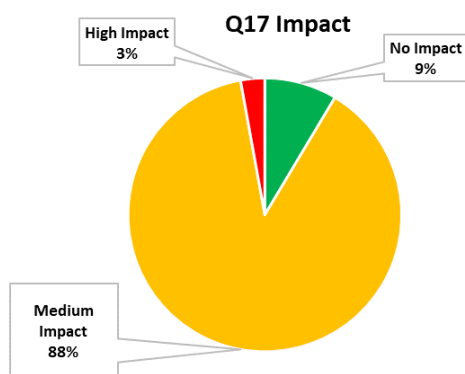
like flood risk and topography so some leeway for minor variances would be helpful. *Noted, however the space standard is intended to ensure that all new homes in Wales are fit for purpose now and in the future. This comment resulted in amendments to introduce an element of flexibility to the space standards.*

- 4.311 The issue of affordability in relation to “Best Practice” is particularly significant in relation to small rural developments, which are often more challenging due to issues such as high abnormal costs due to ground conditions, availability of services/infrastructure etc. and the lack of economy of scale. *Noted, however the standard sets out the vision and leaves the responsibility for achieving high quality in the hands of housing providers who must (by the use of best practice) set their own quality agenda. Concerns about cost noted, however the standard responds to the Welsh Government direction of travel to deliver high quality sustainable homes and funding models acknowledge the additional cost of smaller schemes.*
- 4.312 Concern regarding actions to “increase the use of sustainable materials, such as timber” in construction of buildings. *Concerns noted, however the standard responds to the Welsh Government direction of travel to deliver high quality sustainable homes.*
- 4.313 Timing of the introduction of the new standard will need to be appreciative of schemes already advanced in design and planning so a transition period will need to be implemented that allows for this situation. *Noted.*
- 4.314 Children have been clear about what new houses should be like and that new houses should be big, with good sized children’s bedrooms and with kitchens and bathrooms big enough for family use. They should have lots of separate rooms and have big enough gardens to play in. They should be modern, look and feel special, and be made beautiful with flowers in the garden and by having attractive house colours, patterns and designs. An extra to make a house especially good for children would be a playroom, and an extra for family use in times of pandemic would be a home learning room. *Noted.*

4.315 Question 17 (Q17):

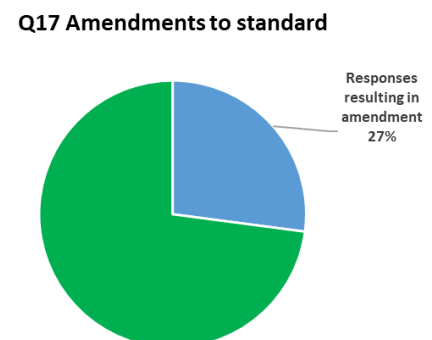
“In view of the effect of Covid-19 which will change the way we live in and use our homes, please indicate any additions to the standards and any other suggestions relating to the pandemic you want us to consider”

4.316 Thirty five responses were received to the question, of which 3% were considered to have high impact, 88% of medium impact and 9% of no impact.



4.317 Although there was broad support for the policy, 57% of the responses expressed concerns, challenging elements of the proposals which required review and consideration.

4.318 The percentages of high and medium impact, combined with the 57% concern challenging the policy resulted in 27% of the responses effecting a material change to the proposed standard.



4.319 Question 17 response themes, summaries and commentary

4.320 There is a need for a defined work space within the home, and access to external space including easy to public transport and amenities. *Home office concerns noted and are accommodated in the standard. The standard is amended to include additional amenity space provisions but matters relating to public transport and other amenities are outside the scope of the standard.*

4.321 DQR is largely focused on the home and the curtilage of the same but with Covid-19, it has become more apparent that communities need equal focus in ensuring that homes are suitable for home working space, that they are built near to facilities such as shops, open space and other amenities. *Matters relating to other amenities are outside the scope of the standard, however the introduction is amended to reference ecological sustainability and community values.*

4.322 Working from home increasingly requires a good internet connection, so all homes should have fibre broadband to the home. *This resulted in the standard being revised.*

4.323 People who are now working from home will have felt an impact on their recent energy bills due to being home more. This further emphasises the need to ensure homes become more self-sufficient so not to penalise those who have no option but to work from home. *This comment contributed to the introduction of higher energy standards to help address the concerns about fuel bills.*

- 4.324 The challenges of working home, home schooling and in general people being at home longer with the increasing pressure that brings on relationship will need to be evaluated. *This comment contributed to amendments to the Preface in relation to the importance of mental health.*
- 4.325 Social housing developments as well as those provided by the mass market should aim at the establishment of communities, something that seems to be lacking at present. Covid-19 is forcing us all to use our streets for exercise and to provide external meeting spaces with neighbours. Current estates are cramped and are devoid of open spaces where people can exercise or meet. New developments should sign up to the need to integrate with established communities, provide opportunities for relaxation for all ages both by the provision of open spaces and indoor communal facilities and provide space where health, care and housing can all come together without the need to travel. *This resulted in amendments to the introduction to reference community values.*
- 4.326 The pandemic has emphasised the need for flexible homes to allow home working and the need for private outdoor space. *This resulted in requirements being added to section 3 on amenity space and private gardens and text amended regarding family homes.*
- 4.327 The provision of external spaces is critical but there is a conflict with affordability for both occupiers and RSLs. Some schemes can only provide external space via communal space and this carries a cost to be maintained by RSLs who will seek to recover costs via service charges. *The concern about maintenance costs of communal space is noted, however the standard responds to the Welsh Government direction of travel to deliver high quality sustainable homes.*
- 4.328 The incorporation of the LTH standard reduces flexibility in design. *Noted, however this is not accepted if we are to be producing homes fit for the future.*
- 4.329 The proposed policy needs to be more specific about the ability to self-isolate. This is of course much harder where people are living in a limited space or sharing facilities, but in a post-Covid world the ability to self-isolate if needed must be a key determinant of housing adequacy. *Noted, however the minimum space standard is intended to ensure that all new homes in Wales are fit for purpose now and in the future and an element of flexibility has been introduced which should help provide for such future needs as self-isolation.*
- 4.330 An opportunity exists to develop a new narrative where energy efficiency is central to a comfortable living and working space. Stronger ties need to be made to public health and the elements that influence it such as thermal comfort, lighting, air quality, acoustics and views of nature. Combining these elements with a holistic approach to addressing energy efficiency can lead to improved health and wellbeing for occupants. Therefore, homes should be designed to enhance occupant wellbeing by taking into account these factors that impact upon health. *The standard addresses the concerns about tenant's heating bills in new homes by exceeding current regulations and through a fabric first approach. The comments on health and wellbeing are noted in the introduction of a new Preface to the standard.*
- 4.331 Covid had unequal impact on underserved or disadvantaged communities in Wales. *Noted.*
- 4.332 Cycling will become much more important in our response to climate change, the Covid -19 crisis, public health targets for physical activity and the reduction in numbers of overweight and obese people in Wales. *Noted and this resulted in amendments to Part 2 to include a requirement for bike storage and consideration for sustainable travel.*

- 4.333 Good indoor air quality is essential to good health. *Noted, however environmental issues such as air quality are largely outside the scope of this standard and regulated by building control.*
- 4.334 Automatic doors in communal areas to reduce touch points. *Noted, however the standard sets out the vision and leaves the responsibility for such detail requirements in the hands of housing providers who must (by the use of best practice) set their own quality agenda.*

5. Welsh Government Response

- 5.1 The response to the consultation was encouraging with 77 responders including a wide range of stakeholders from the housing sector. It was particularly interesting to have received opinions from a children's group "Pupils 2 Parliament" which focussed on the importance of space within the home. The children were also asked to choose the final name for the standard.
- 5.2 There was a majority of support for the standard, however over a third of the responses raised concerns with 19% of the responses resulting in amendments to the standard.
- 5.3 There was a great deal of interest in the accessibility (Lifetime Homes), space standards and low carbon design and five of the questions attracted more challenging views than others notably...

- 5.3.1 **The adoption of the standard for all housing irrespective of tenure** (Question 7). Views related to potential reductions in supply, additional costs and some concern about the regulation of the standard if implemented for all tenures post 2025. No amendments to the standard were necessary as the concerns will need to be taken into account in future changes in policy that will be necessary for implementation.
- 5.3.2 **Minimum space standards** (Question 8). Reservations from house builders, Registered Social Landlord's and Local Authorities, coupled with known ministerial views resulted in the introduction of an element of flexibility to more closely align the Welsh space standards with the English National Described Space Standards (NDSS).
- 5.3.3 **The proposed name of the standard** (Question 10). This question attracted significant dissent and it was decided that the name should change to reflect concerns. 55 children aged 8 to 11 from Presteigne Primary School, who responded to the consultation were asked for opinions and voted on four suggested new names. The children were instrumental in the decision and chose "Welsh Development Quality Requirements 2021" subtitled "Creating Beautiful Homes and Places" as the new name of the housing standard.
- 5.3.4 **Early introduction of changes to conservation of the fuel and power building regulations** (Question 11). Although many responses were in agreement with early implementation, there were reservations about costs and lack of skills in the installation and inefficient use of new technologies and their carbon footprint. Also, although affordable housing could be implementing the new building regulations approximately a year ahead of the regulatory requirements, without building control being in place regulation of the early introduction has been raised as a concern.
- 5.3.5 **Introduction of EPC A** (Question 12). There is disagreement in the industry about the use of EPC energy ratings to both drive low carbon design and to reduce heating bills because at times an EPC energy rating can be at odds with reducing carbon. EPC A is however considered to be a sufficiently useful parameter for encouraging the reduction of fuel bills for tenants. The standards have been amended to include a revised energy section with requirements to achieve an EPC A energy rating (SAP92 or greater) through a minimum fabric standard and without the use of fossil fuel boilers. However, so as not to discourage high quality low carbon design solutions such as the Passivhaus standard, alternative proposals to EPC A and non fossil fuel fired boilers will be acceptable where it can be demonstrated by independent certification that the building's energy demand is reduced in accordance

with the Energy Hierarchy for Planning in Welsh Government's Planning Policy Wales.

5.4 In consideration of the responses to all of the consultation questions, the following significant amendments have been made to the standard...

- 5.4.1 Title changed to "Welsh Development Quality Requirements 2021", subtitled "Creating Beautiful Homes and Places".
- 5.4.2 Preface introduced referencing healthy homes, wellbeing, mental health, cultural suitability, place making, ecology and sustainability.
- 5.4.3 Reference to affordable housing definition corrected with link to TAN 2.
- 5.4.4 MMC section amended to state that MMC is a preferred delivery method to accord with the Welsh Government's MMC Implementation Policy and link added to the policy.
- 5.4.5 Circular economy section reworded to include reference to decarbonisation.
- 5.4.6 Energy section completely re-worded.
- 5.4.7 Part 2 amended to include cycle storage requirements.
- 5.4.8 Part 2(d) the word "minimum" removed to enable an element of flexibility to the space standards Appendix.
- 5.4.9 Part 2(j) separated from 2(i) to clarify the requirement to consider space for overnight stays.
- 5.4.10 Part 2(m) added relating to broadband connectivity.
- 5.4.11 Part 3(f) amended to clarify that gardens are to be of sufficient size and that consideration should also be given to the provision of private or communal amenity space to flats.
- 5.4.12 Part 3(h) amended for hard wired carbon monoxide detectors and Part 3(i) fire safety provisions added in response to building safety concerns.
- 5.4.13 Potential flexibility to floor areas included in the Appendix B space standard.
- 5.4.14 Appendix A amended to clarify that accessibility requirements will be satisfied by complying with the Lifetime Homes Standard.
- 5.4.15 Appendix B 3rd column title amended to Gross Internal (floor) Area (GIA) m²

6. Next Steps

- 6.1 The Minister for Climate Change will be asked to approve the revisions to the proposed standard and thereafter issue a letter setting out the requirement for implementation for all new grant funded homes and affordable homes delivered through planning agreements (under section 106 of the Town and Country Planning Act 1990) and planning conditions for schemes commissioned from 01 July 2021.
- 6.2 Welsh Government officers will hold regional launch events to explain the requirements and to provide opportunities for further discussion with housing providers.
- 6.3 The standard will be further reviewed in 2023.

Appendix

List of all the respondents by category

Third Sector including Action Groups	
Age Cymru	Cardiff Cycle City
Care & Repair Cymru	Disability Advice Project
Motor Neurone Disease Association	Newtown U3A (Anonymity requested)
Shelter	Tai Pawb and Cymorth Cymru
Wheelrights	TPAS Cymru
Total - 10	Percentage of total respondents from this category 13%

Registered Social Landlords	
Cardiff Community Housing Association	Clwyd Alyn
Bronafon	Cynon Taf Community Housing Group
Family Housing Association	Grwp Cynefin
Melin Homes	Merthyr Valley Homes (Anonymity requested)
Newport City Homes	Newydd Housing (Anonymity requested)
Pobl	Taff Housing Association
Trivalis	Wales and West Housing Association
Total - 14	Percentage of total respondents from this category 18%

Continued...

Local Authorities including National Parks	
Cardiff Council (Anonymity requested)	Carmarthenshire County Council
Denbighshire County Council	Flintshire County Council
Neath Port Talbot County Borough Council	Powys County Council
Rhondda Cynon Taf County Borough Council	Snowdonia National Parks
Swansea City Council	Vale of Glamorgan Council
Wrexham County Borough Council	Pembrokeshire Coast National Park
Anglesey County Council	Monmouthshire County Council (Anonymity requested)
Ceredigion County Council (Anonymity requested)	
Total - 15	Percentage of total respondents from this category 19%

Those acting in a Private capacity	
Chris Moorman (Anonymity requested)	John Filce
Sustainable Living Solutions	Tony Rayer
G Rees (Anonymity requested)	John Charles
M Jones (Anonymity requested)	Daniel Parry (Anonymity requested)
Joseph Hardwicke	Susan Rodaway (Anonymity requested)
Total - 10	Percentage of total respondents from this category 13%

Continued...

Businesses including house builders, consultants and representative bodies	
Community Housing Cymru	House Builders Federation
Ilke Homes (Anonymity requested)	Kingspan (Anonymity requested)
Marks Davies (Anonymity requested)	Materials Products Association
North and Mid Wales Association of LA's	Public Health Wales/Chartered Institute of Housing Cymru joint
Redrow Homes	Royal Institute of Chartered Surveyors
Royal Society of Architects in Wales	Royal Town Planning Institute
Sustainable Energy Association	Wood Knowledge Wales
CRSH Architecture and Energy	Vaillant UK LTD
Mineral Wool Insulation Manufacturers Association (MIMA)	National House-Building Council (NHBC) (Anonymity requested)
Federation of Master Builders Cymru	
Total - 19	Percentage of total respondents from this category 25%

Government Body	
Design Commission for Wales (Anonymity requested)	Welsh Government - ESNR
Ministerial comment (Mr Irranca-Davies)	Older Peoples Commissioner for Wales
Welsh Government - Decarb Team	National Police Chiefs Council Lead for Housing and Regeneration
Total - 6	Percentage of total respondents from this category 8%

Continued...

Academic including children	
London Met	Pupils 2 Parliament
Active Building Centre	
Total - 3	Percentage of total respondents from this category 4%

A total of 16 respondents (21%) requested to remain anonymous.

Copies of responses are available upon request, redacted as necessary to protect anonymity.

End of summary of responses.