



Llywodraeth Cymru
Welsh Government

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Y Grŵp Newid Hinsawdd a Materion Gwledig
Climate Change and Rural Affairs Group

Welsh Development Quality Requirements 2021 Creating Beautiful Homes and Places

(WDQR 2021)

Frequently Asked Questions (FAQ) Addendum

December 2023

BACKGROUND

One of the key recommendations of the Independent Review of Affordable Housing Supply 2019 was that *“The Welsh Government should develop new consolidated and simplified standards for new build grant funded and S106 homes. The new standards should be easier to use and should not have conflicting requirements.”*

In response to the recommendation, the housing quality standard “Welsh Development Quality Requirements 2021 – Creating Beautiful Homes & Places” (WDQR 2021) was launched July 2021 setting new quality requirements for social housing centred on flexibility, space, and sustainability.

It has been agreed that WDQR 2021 would be reviewed more often than previous iterations of similar standards such as the former Development Quality Requirements 2005 (DQR).

Welsh Government officials have reviewed WDQR 2021 in operation over the past two years and have concluded that the standard does not need to be substantially changed to maintain policy aims at this time. However, questions in relation to the application of the standard have arisen which are addressed in this Addendum.

QUESTIONS AND RESPONSES

With reference to the Requirements and Appendices to WDQR 2021

REQUIREMENT 1(a)

Question

Is there any sector wide advice on whole life cost analysis and value for money?

Response

The Royal Institute of Chartered Surveyors (RICS) have produced “Life Cycle Costing” (1st edition, April 2016) as professional guidance. The guidance summarises what is meant by lifecycle costing and whole life costing. The RICS also reference proprietary life cycle evaluators.

REQUIREMENT 1(b)

Question

Can the Modern Method of Construction (MMC) Acceptable Cost Guidance (ACG) 10% uplift be clarified?

Response

An ACG uplift of up to 10% is available on schemes which evidence a commitment to an acceptable form of MMC.

Delivery of homes via MMC should be viewed as a technological “step change” and not merely the inclusion of elements of the construction that are already traditionally produced off-site. Traditional timber frame Category 2 MMC (using frames which consist of a skeletal structure only) is not considered to be a sufficient “step change” and therefore does not qualify for MMC ACG uplift.

Acceptable Category 2 frame solutions will be “more complex panels” involving factory-based fabrication to the skeletal frame such as elements of lining and insulation. It should be noted that although fully panelised frames are sometimes referenced as “closed panel”, manufacturers commonly reference “more complex panels” with factory fixed elements to one side of frames as “open panel” which is acceptable.

Whilst Welsh Government encourages the efficient use of timber in construction and for the avoidance of doubt, materials other than timber may also be used in MMC and offsite manufacture.

REQUIREMENT 1(c)

Question

Is there any guidance available to assist with embodied carbon calculations both for the design and for the "as built" scenarios?

Response

The RICS have produced a Whole Life Carbon Assessment (WLCA) standard (2nd Edition) which is recognised for consistent and accurate carbon measurement in the built environment. The standard is intended for use by professionals, enabling them to meet client demand by measuring and managing carbon emissions in a reliable and consistent manner.

REQUIREMENT 1(d)

Question

What "Alternative proposals" are acceptable for Requirement 1(d) compliance?

Response

If "alternative proposals" are non-fossil fuel and can be demonstrated to reduce energy demand in accordance with the Planning Policy Wales "Energy Hierarchy", the resulting SAP score will be accepted for SHG technical scrutiny and grant.

In practice this will most likely mean engaging suitably qualified professionals to design and model the performance of a building using the AECB/Passive House Planning Package (PHPP) to show that the building's energy demand has been satisfactorily reduced in line with Welsh Government planning policy. Suitably qualified professionals would include Certified Passive House Designers/Consultants or designers/consultants with demonstrable experience in the use of PHPP.

If presented with this alternative approach, the PHPP output would be expected to demonstrate that heating energy demand for the building is 40 kWh/m²/year or less and the designers would need to provide PDFs of the complete PHPP model at each technical scrutiny stage (Concept, Planning and Post Completion Review) accompanied by a short compliance statement. It is accepted that SAP modelling of the alternative approach may not yield an EPC A energy rating.

Please note that an alternative approach should not be seen as a way of targeting a SAP energy rating lower than EPC A, rather that we will accept the advice of an independent expert who demonstrates a reduction in energy demand in accordance with our requirements which may or may not yield EPC A depending upon the design.

REQUIREMENT 1(d)

Question

Updates in SAP modelling during the design and construction phases of schemes can adversely affect designed SAP scores and final EPC certification. Will adversely affected SAP results be accepted?

Response

Energy targets set at the date of Concept submissions will be expected to deliver EPC A based on the SAP software version current at the date of submission. It is accepted that where software changes occur after Concept stage, newer versions of software may not yield EPC A. "As designed" SAP calculations using versions of the model used at Concept stage, may be used to prove the required standard at completion regardless of any interim software changes.

REQUIREMENT 1(d)

Question

How are the building regulations Approved Document Part L "Appendix E" fabric values intended to be met?

Response

The elemental fabric values of "Appendix E" to the building regulations Approved Document Part L, Conservation of Fuel and Power, 2022 edition (for use in Wales) must be met as minimums. Offsetting fabric values (permissible for "Part L" DER/TER calculation methodology) is not acceptable for WDQR 2021 compliance.

For example, the external wall "U-value" (W/m²K) of 0.13 must be achieved or improved upon for construction.

REQUIREMENT 1(d)

Question

Are Biomass, Biofuels or "off grid" LPG to be considered as fossil fuels?

Response

Biomass and biofuels are renewable energy sources, not fossil fuels. However, social landlords should be mindful that fuels such as biomass emit particulate matter into the air which can contribute to poor air quality in the local area, particularly in built up areas where air quality may already be a concern. The use of biofuels may impact upon agricultural farming, diverting crops which might otherwise be used for food production.

LPG is a fossil fuel.

REQUIREMENT 1(d)

Question

Is the reference to "category 1 buildings" incorrect regarding overheating and CIBSE TM59.

Response

Compliance should be assessed using Type I occupancy (as per section 4.4 of CIBSE TM59), which assumes that the dwelling may be occupied by vulnerable occupants at some stage over its lifetime.

An assessment of overheating in accordance with Building Regulations Approved Document Part O is also a requirement.

REQUIREMENT 3(a)

Question

For some existing buildings it is not possible to obtain Secured by Design (SbD) Gold standard certification. In these circumstances what SbD certification is acceptable to Welsh Government?

Response

Welsh Government acknowledges that full compliance with WDQR 2021 might not always be possible for existing dwellings or buildings being converted and refurbished to provide housing and consequently the Preface to WDQR 2021 states...

“Where homes are being refurbished, providers should (if practicable and cost effective to do so) take all opportunities to meet the standard, but where this is not possible homes must have adequate space and facilities for everyday living.”

The acquisition and refurbishment of existing buildings and existing dwellings should therefore always aim to achieve the full WDQR 2021 standard, which includes SbD Gold standard certification. Where existing buildings and existing dwellings do not initially meet the standard but can be reasonably redesigned to meet the standard (ie it is practicable and cost effective to do so) then the opportunity should be taken to do this. However, where it is illustrated that it is not possible to achieve the standard due to existing circumstances (for example where car parking is not overlooked from the dwelling) then Welsh Government agree that the award of SbD Silver certification may be acceptable subject to the agreement of the Designing out Crime Officer (DOCO). Where schemes are located in areas subject to serious crime, the DOCO may not agree to the Silver standard, in which case the scheme will not be acceptable to Welsh Government.

REQUIREMENT 3(a)

Question

For works to existing buildings, is it necessary to have good quality windows and doors removed from properties before the end of their reasonable lifespan?

Response

The intention to retain existing windows and doors in good condition on refurbishment works and to replace them with SbD Gold compliant elements when they become due for renewal in the future is acceptable. Providing that the DOCO has not advised that the elements should be replaced now due to concerns with local crime risk and/or inadequate physical security. Welsh Government accepts that the DOCO will withhold the issue of SbD Gold certification until such time as when the elements are replaced, providing that this is the only reason for withholding the certificate. (Also, see comments above regarding the acceptability of SbD Silver award where Gold award is not achievable)

REQUIREMENT 3(h)

Question

Are Carbon Monoxide detectors still necessary with non fossil fuels?

Response

Homes should be fitted with hard wired Carbon Monoxide detectors where combustion appliances (such as gas and oil boilers, stoves and cooking hobs) are retained or installed, including solid fuel and portable combustion appliances.

APPENDIX A

Question

Is the link to the Lifetime Homes standard broken?

Response

Here is the link to the standard...

<https://cae.org.uk/our-services/housing-services/lifetime-homes/>

APPENDIX A

Question

Can the Lifetime Homes Standard for level parking spaces and level approaches to dwellings be relaxed for steeply sloping sites?

Response

Developments must be designed to fully comply with the Lifetime Homes Standard (LTH).

It is recognised that on steeply sloping sites, level access to all approaches and all entrances (LTH Criterion 3) may not be practicable and that an element of pragmatism may be necessary in arriving at the most appropriate solutions which will need to be agreed with Welsh Government on a site-by-site basis at the Concept design stage.

However, it should be noted that the maximum gradient requirements of LTH Criterion 1 for the widened parking bay, and the requirements for an accessible route to the dwelling entrance of LTH Criterion 2 must not be compromised.

APPENDIX B

Question

Appendix B only references a limited number of typical GIA's, whereas the ACG guidance has a larger number of types?

Response

The ACG guidance tables A and B may be used to establish the space requirements for those additional home types not referenced within the WDQR 2021 Appendix B floor area table.

APPENDIX B

Question

What is expected from s106 partners in the applicable elements of the Appendix A space requirements?

Response

The accessibility requirements of the LTH standard and adequate facilities for clothes washing, drying, and airing are an integral space requirement for s106 compliance.

All space requirements set out in Appendix A therefore apply to S106 schemes.