

Mandatory Quality Standards for new, rehabilitated and existing homes - Consultation Response Form

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Part A

The proposed introduction of the WHQS as the mandatory standard for existing social housing in Wales

Question A1: What are your views on the proposed standards and guidance set out in Part A of the consultation document?

Our overall view is that the proposed standard is framed far too narrowly and needs to be broadened to recognise the following issues:

- Environmental considerations should be broadened to make the relevant links with WG's wider policy objectives.
- Houses are the building blocks of neighbourhoods and communities, and their design should be integrated with these wider contexts.
- Over their proposed design life (60 years – which strikes us as rather short), these houses will be subject to rising pressures – particularly in relation to climate change. They must, therefore, be “future-proofed”, either in their initial design or in terms of being easily adaptable as conditions change. We note that the recommended lifetime of development for residential (in terms of flood risk) is 100years¹.
- The guidance is clear (quite rightly) in relation to utilitarian issues, but ignores other issues of housing and urban design that are now known to contribute significantly to personal quality of life. Incorporation of green space is a key issue here.

Welsh Government should view this broadening of approach as being part and parcel of contributing to the seven well-being goals of the Well-being of Future Generations (Wales) Act 2015.

We explore these issues in more detail in our response to Question A3 of this consultation.

¹ This is supported by WGs Chief Planning Officers letter to LPAs of Jan 2014.

Question A2: What do you think are the benefits and/or dis-benefits of using this standard and guidance?

As outlined above, the main dis-benefit of using this standard and guidance in their current form is that upgrading of existing social housing stock will fail to:

- Make its full potential contribution to improving people's existing quality of life.
- Commit future generations to costly and unnecessary refurbishment or replacement.

Both of these dis-benefits could be avoided by a little careful thought now, based on a large amount of existing evidence – which we have sought to provide here.

Question A3: What changes (if any) do you think are needed? Please explain and provide evidence to support your views.

We consider that the standard and guidance should be strengthened in the following areas:

Reducing greenhouse gas emissions

In 2013 (the latest year for which definitive data are available), the Residential sector currently contributed some 7.2 Mt CO₂e of greenhouse gas emissions to the overall Wales total (by consumption) of 42.8 Mt CO₂e (i.e. 17%)². We suggest that a more ambitious standard than that proposed here could lead to a significant reduction in these emissions:

- Directly, through reducing emissions from social housing.
- Indirectly, through providing a “critical mass” workload that would allow the development of appropriate technologies and services in Wales, which could then be extended to address privately owned and leased housing.

Improving the thermal and energy efficiency of housing stock has multiple benefits. Besides reducing energy demand, driving down carbon emissions and reducing consumers' energy bills, energy efficient houses also have positive impacts on public health and wellbeing.³ A study by Public Health England indicates that a robust programme of energy efficiency not only improves health directly but also contributes to wider determinant of health, such as improving educational performance among children and young people, and reducing work absences in the wider population.⁴

A report from the International Energy Agency's (IEA) stated that the most important fuel for the future is energy efficiency⁵. Likewise, the IEA's 2050 mitigation scenarios indicate that energy efficiency is the most important carbon reduction measure. This is because the cheapest energy is energy we don't use. Energy efficiency and reducing energy demand are, therefore, the most effective and cost efficient means to reduce carbon emissions.

² Greenhouse Gas Inventories for England, Scotland, Wales and Northern Ireland: 1990 – 2013

http://naei.defra.gov.uk/reports/reports?report_id=810

http://uk-air.defra.gov.uk/assets/documents/reports/cat07/DA_GHGI_1990-2013_Report_v1.pdf

³ Age UK (2012): The cost of cold: Why we need to protect the health of older people in winter, Age UK, London

⁴ PHE (2014): Fuel Poverty and Cold Homes: Related Health Problems. Public Health England.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/355790/Briefing7_Fuel_poverty_health_inequalities.pdf

⁵ <http://www.iea.org/newsroomandevents/pressreleases/2014/october/global-energy-efficiency-market-an-invisible-powerhouse-at-least-usd-310byr.html>

Water efficiency

A similar comment applies here – that the standards and guidance in their current form are not sufficiently ambitious, and simply do not reflect existing best practice. In December 2012 Environment Agency Wales and the Energy Saving Trust provided Welsh Government with Guidance on water and associated energy efficiency for the Welsh Housing Quality Standard for retrofit programmes⁶.

The following text is taken from that report:

“Heating water for showers, baths, taps and water-using appliances costs the average UK household £200 a year on their fuel bills and represents approximately 23% of household energy costs. Installing simple water-saving measures, such as water-efficient taps and showers, will save both water and energy by minimising heated water, which could reduce household bills by up to £120 annually.

Social housing accounts for 17% of all properties in Wales. The Welsh Housing Quality Standard is driving a high level of refurbishment activity in social housing across Wales, including kitchen and bathroom replacements, and provides an opportunity to ‘piggyback’ water efficiency retrofit.

Water efficiency needs to be considered and addressed as core business in energy saving and fuel poverty agendas. It is becoming increasingly important to ensure that water and energy efficiency are considered in tandem so that domestic water efficiency policies complement energy efficiency policies, maximising the home budget benefit.

This guidance is aimed at local authorities and housing associations including estate managers and maintenance teams, outlining the need for water conservation and the benefits. The guidance is designed to help you choose the right products to achieve both water efficiency and energy efficiency and how to deliver these”.

Given its clear relevance, we would expect to see explicit reference to this EAW / EST guidance here.

Dwr Cymru Welsh Water consider that certain parts of Wales are already in a position of water deficit, and that climate change will make things worse⁷.

Flood risk management

In Wales new residential developments in areas of flood risk must be designed to be flood free in the 1:100 + Climate Change event. They require a Flood Consequence Assessment (FCA), as outlined in Welsh Government’s “Planning Policy Wales Technical Advice Note 15: Development and Flood Risk”⁸. The FCA must look at the risk and consequences of flooding to the development and elsewhere over the lifetime of the development.

Section 7.6 of the current guidance states: “Planning and building standards have a complementary role in flood management and the use of flood damage resistant and mitigation measures will be required as part of ensuring that consequences of flooding are

⁶<http://www.energysavingtrust.org.uk/organisations/sites/default/files/Guidance%20on%20water%20and%20associated%20energy%20efficiency.pdf>

⁷ <http://www.dwrcymru.com/en/Environment/Water-Resources/Water-Resource-Management-Plan.aspx>

⁸ <http://gov.wales/docs/desh/publications/040701tan15en.pdf>

acceptable. Simple design features, such as raising floor levels, while ensuring that appropriate access is maintained for disabled people, or keeping electrical circuits above levels likely to be affected by flooding, can enable buildings to resist and cope with flooding better". We note that TAN15 is currently subject to a factual update, with an expected issue of summer 2016. We would expect the link between the TAN15 guidance and building standards again to be emphasised in the revised version.

It is clearly appropriate that similar thinking should be applied to refurbishment of existing housing in areas that are prone to flooding. We would, therefore, expect to see explicit reference to flood risk management within the Welsh Government's mandatory quality standards and guidance for homes. This could cover both design and mitigation issues and the need to draw up refuge and evacuation plans in the event of a flood incident.

Incorporation of green space

While noting that the proposed Guidance applies only to houses and their gardens, it is a fundamental point of our arguments here that housing needs to be designed in a way that is integrated with the surrounding public space. Indeed, we suggest that there should be an overarching requirement and/or detail for **place-making**.

"Building for Life 12" is a UK government-endorsed industry standard for well-designed homes and neighbourhoods. Local communities, local authorities and developers are encouraged to use it to guide discussions about creating good places to live⁹.

Part 6 of the proposed Welsh Government Standard considered here states that all households in Wales shall have the opportunity to live in good quality dwellings that are "Located in attractive and safe environments". However, sub-sections a) to f) of this part of the standard make no reference to the use of the external environment to promote social cohesion, mental well-being, physical health, nor to ameliorate the effects of adverse weather and a changing climate. In this respect this part of the standard is totally inadequate in terms of meeting people's wider well-being, as elaborated by the Well-being of Future Generations Act.

Current guidance on the interpretation of sub section b) "Is there soft and hard landscaping with planting in protected areas?" could easily be misinterpreted and lead to the removal of trees and large shrubs in order to "clear sight lines and remove hiding places". Such an action would actively harm local residents – as demonstrated by a study carried out in social housing in Chicago where removal of trees led to an increase in domestic violence¹⁰.

When Registered Social Landlords have taken a modern, evidence-based approach to green space management, they have created environments that have promoted the health, social cohesion and economic well-being of their tenants. Cartrefi Conwy brought the external environment of the Peulwys estate up to the standards specified in the Green Flag Awards at the same time as they refurbished the housing stock on the estate. As a result: anti-social behaviour has decreased; two voluntary conservation groups have been established by the residents; residents have received training in horticulture; and at least one resident has started their own landscape management business. The estate, now re-

⁹ http://www.designcouncil.org.uk/sites/default/files/asset/document/Building%20for%20Life%2012_0.pdf

¹⁰ (Kuo, F.E. & Sullivan W.C. (2001). Aggression and violence in the inner city: Impacts of environment via mental fatigue. *Environment & Behavior*, 33(4), 543-571.)

named Parc Peulwys was the first housing estate in Wales to win the Green Flag Awards – a standard normally used to measure the quality of management of parks.¹¹

Similarly, the Augustenborg estate in Malmo, Sweden, suffered from regular, serious flooding which damaged communal facilities and businesses based on the estate. The local authority worked closely with the residents to design and install Sustainable Drainage Systems (SuDS). The use of natural features like ponds, streams, trees and wetlands rather than pipes: cured the flooding; created two new businesses; replaced the waiting list to move out of the estate with a waiting list to move on to the estate; and even led to an increase in voter turn-out in elections. The estate is now seen as an attractive and desirable place to live, rather than a “sink” estate and is used internationally as an example of good practice¹².

Proper provision of high quality green spaces is recognised throughout Welsh Government policy as a means of improving the quality of life¹³, and Natural Resources Wales has developed guidance to help in the planning and management of green spaces of the right kinds, in the right quantities and in the right places to promote the sustainable well-being of people living in Welsh towns and cities. As a minimum, such guidance should be followed by all housing providers to ensure that good housing is not surrounded by bad spaces.

We therefore recommend that Part 6 should be replaced by the following statement:

“All households in Wales shall have the opportunity to live in good quality dwellings that are located in attractive environments which promote the health, safety and well-being of residents and visitors.”

We recommend that sub-section b) should be deleted and that instead the sub-sections to Part 6 should include the following:

- All housing should comply with NRW’s standards for the provision of accessible natural green space, and where this is not possible due to absolute physical constraints, measures to ameliorate any deficiency are taken – using the guidance provided in the NRW green space toolkit (available from NRW on request).
- The quality of management of green spaces should be audited independently using a system such as the Green Flag Awards¹⁴.
- All new developments and major refurbishments shall comply with the Welsh Government Recommended Non-Statutory standards for Sustainable Drainage (SuDS) in Wales¹⁵, until such time as statutory standards are enforced.
- Trees and vegetation should be used to shield vulnerable properties against excess summer heat, following the guidance on page 5 of the Welsh Government’s guidance for care home managers and staff¹⁶.

¹¹ <http://www.bbc.co.uk/news/uk-wales-north-west-wales-33634134>.

¹²

¹³ <http://gov.wales/topics/planning/policy/tans/tan16e/?lang=en>

¹⁴ <http://www.keepwalestidy.org/greenflag>

¹⁵ <http://gov.wales/topics/environmentcountryside/epq/flooding/drainage/?lang=en>

¹⁶ <http://www.wales.nhs.uk/sitesplus/documents/863/Care%20home%20managers%20and%20staff%20caring%20for%20patients%20during%20a%20heatwave.pdf>

- Green infrastructure, such as trees and shrubs, should be adopted to control and ameliorate the effects of environmental noise¹⁷, and to help intercept airborne particulate pollution¹⁸.

The benefits of trees in place-making are well-documented, as demonstrated by the Forestry Commission's study on "The case for trees in development and the urban environment"¹⁹ and the Trees and Design Action Group's studies on "Trees in the Townscape" and "Trees in Hard Landscapes"²⁰.

In our study "Tree Cover in Wales' Towns and Cities: Understanding canopy cover to better plan and manage our urban trees"²¹ we drilled down to a ward by ward (LSOA) level and found that, overwhelmingly (but not exclusively), deprived communities had less tree cover than more advantaged neighbourhoods. The 20% woodland status for town / neighbourhood is part of the drive to focus local authorities' (and potentially Registered Social Landlords') minds to set canopy cover targets as a move to achieving an "attractive environment".

We note that the Appendices in the proposed Standard show dwelling layout options but do not offer up option standards for private rear gardens and estate/housing layouts, both of which could demonstrate best practice in place-making.

The Landscape Institute (LI), including Landscape Institute Wales (LIW), offer up a number of very helpful policy documents providing best practice guidance in terms of "inspiring great places". These include:

- Making it Home: the power of landscape to create good housing²²
- Profitable Places - Why housebuilders invest in landscape²³
- Creating Healthy Places²⁴

In re-discovering the "garden city" approach The LI has formulated five principles for creating places that people are proud to live in²⁵. These are:

- 1 – Start with the landscape
- 2 – Work within the landscape
- 3 – Develop a positive relationship between town and country
- 4 – Build a place worth living...for life
- 5 – Create vibrant places

In summary, we consider that the proposed Housing Quality Standard should be significantly expanded to address the issues we raise here.

¹⁷ <http://gov.wales/docs/desh/publications/131217noise-action-plan-for-wales-en.pdf>

¹⁸ [http://www.forestry.gov.uk/pdf/urgrp_evidence_note_006_Improving_air_quality.pdf/\\$FILE/urgrp_evidence_note_006_Improving_air_quality.pdf](http://www.forestry.gov.uk/pdf/urgrp_evidence_note_006_Improving_air_quality.pdf/$FILE/urgrp_evidence_note_006_Improving_air_quality.pdf)

¹⁹ [http://www.forestry.gov.uk/pdf/eng-casefortrees.pdf/\\$FILE/eng-casefortrees.pdf](http://www.forestry.gov.uk/pdf/eng-casefortrees.pdf/$FILE/eng-casefortrees.pdf)

²⁰ <http://www.tdag.org.uk/>

²¹ <http://naturalresources.wales/media/3705/tree-cover-in-wales-towns-and-cities-2014-summary.pdf> and <http://naturalresources.wales/media/4123/tree-cover-in-wales-towns-and-cities-2014-study.pdf>

²² <http://www.landscapeinstitute.org/PDF/Contribute/MakingithomeA4final.pdf>

²³ http://www.landscapeinstitute.org/PDF/Contribute/ProfitablePlacesOctober2014_001.pdf

²⁴ http://www.landscapeinstitute.org/PDF/Contribute/PublicHealthandLandscape_CreatingHealthyPlaces_FINAL.pdf

²⁵ http://www.landscapeinstitute.org/PDF/Contribute/LIGardenCitiesPrinciples_2015.pdf

Adapting to climate change

As climate change takes hold we can expect to see in Wales²⁶:

- A rise in average temperatures, and a rise in maximum summer temperatures.
- Less summer rainfall, but more winter rainfall, and an increasing frequency of “intense rainfall” events.
- Rising sea levels.

The overall impact of these changes will be to exacerbate the existing problems noted above in relation to flooding, water shortages and exposure to heat.

Under the Climate Change Act (2008) the UK Government has to publish every five years a “UK Climate Change Risk Assessment” (CCRA). The assessment is under-pinned by an Evidence Report that systematically assesses the risks to different sectors, including the built environment. The Evidence Report for first CCRA in 2012 included a separate assessment for Wales²⁷. The UK Committee on Climate Change are currently preparing the Evidence Report for the second CCRA; this will be published in July 2016²⁸ and will include a section on “People and the Built Environment”.

Given the long design life of housing, and the need to avoid costly future refurbishment or retrofit, it is essential that current refurbishments anticipate future climate, or are designed to be “adaptation ready”. In setting the new Welsh Housing Quality Standard and guidance the Welsh Government should take on board the messages from the CCRA, and demonstrate explicitly that it has done so.

Question A4: We would welcome your views on the potential impact of the proposals for people with the following protected characteristics:-

- Disability
- Race
- Gender and gender reassignment
- Age
- Religion and belief and non-belief
- Sexual orientation
- Human Rights
- Children and young people

The thrust of our comments made above is that the Mandatory Quality Standard as currently framed fails to address people’s quality of life in the round. We think that this deficiency is especially important in relation to older people, and to children, given their particular needs, and that fact that they may spend relatively more of their time at home.

²⁶ <http://gov.wales/topics/environmentcountryside/climatechange/publications/impactsforwales/?lang=en>

²⁷ <http://ccra.hrwallingford.com/CCRAReports/downloads/CCRA%20for%20Wales%2016%20July%202012.pdf>

²⁸ <https://www.theccc.org.uk/tackling-climate-change/preparing-for-climate-change/climate-change-risk-assessment-2017/>

Question A5: We would welcome any comments you may have on the potential impact of the proposals on the Welsh Language.

No comments on this section.

Question A6: 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:

No comments on this section.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

Part B

The proposed introduction of DQR as the mandatory guidance for the design and construction of new and rehabilitated housing in Wales where Welsh Government subsidy is provided

Question B1: What are your views on the proposed standards and guidance set out in Part B of consultation document?

Our general views in relation to new and rehabilitated housing mirror those made above in relation to Part A. We will, therefore, not repeat them here. We have, however, made one additional response in response to Question B3, and provide a comment in relation to Question B4.

Question B2: What do you think are the benefits and/or dis-benefits of using this standard and guidance?

See response to Question A2. No further comments here.

Question B3: What changes (if any) do you think are needed? Please explain and provide evidence to support your views.

Reducing greenhouse gas emissions

Under the EU's Energy Performance of Buildings Directive, all new buildings must be nearly zero energy buildings by the end of 2020 and public buildings must be built to this standard by 2018. This means buildings must be very energy efficient and have no net carbon emissions from energy use. The definition of zero is that the very low amount of energy required to run them should be covered to a significant extent by energy from renewable sources, including renewable sources produced on-site or nearby. We would expect this requirement to be reflected in the Welsh Government's mandatory Standard and Guidance.

Experts from Cardiff University have designed and built the UK's first purpose-built, low-cost energy smart house, capable of exporting more energy to the national electricity grid than it uses²⁹. This is designated the "Solcer" house – Smart Operation for a Low Carbon Energy Region.

The recent inquiry by NAW's Environment and Sustainability Committee, exploring '[Smarter Energy Future for Wales](#)³⁰', identified that "smarter housing for future generations" was a key issue. This recommended a trial of the Solcer-type approach, followed by wider rollout once success had been demonstrated

Question B4: Do you think this standard should be used when building new social housing whether funded or not because of the wider public benefits? Please explain and provide evidence to support your views.

Yes. We consider that all the suggestions we have made in this response would contribute to improving people's overall quality of life. If the Standard were to be revised along these lines, then we would support its application to as wide a range of housing as possible.

Question B5: We would welcome your views on the potential impact of the proposals for people with the following protected characteristics:-

- Disability
- Race
- Gender and gender reassignment
- Age
- Religion and belief and non-belief
- Sexual orientation
- Human Rights
- Children and young people

See response to Question A4. No further comments here.

Question B6: We would welcome your views on the potential impact of the proposals on the Welsh Language.

No comments on this section.

Question B7: 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:

No comments on this section.

²⁹ <http://www.solcer.org/news-items/uks-first-smart-carbon-positive-energy-house/>

³⁰ <http://www.senedd.assembly.wales/mgIssueHistoryHome.aspx?IID=13374>