



GIG
CYMRU
NHS
WALES

Iechyd Cyhoeddus
Cymru
Public Health
Wales



Chartered
Institute of
Housing
Cymru

Mandatory Quality Standards for new homes

A joint CIH Cymru & Public Health Wales
consultation response

1. Introduction

- 1.1 Building homes that are of the highest quality in Wales is in the interest of not only meeting the demand for housing, but helps to ensure that homes act as a catalyst for improving people's health and wellbeing, that social and community cohesion is enhanced, and that environmentally friendly and sustainable approaches are supported. This should be the front and centre of our approach in Wales. Covid-19 has re-kindled the conversation about what 'home' can mean to people, with more people working and staying at home, and the home being a source of safety and security in these challenging times. In addition to this, spending more time at home can highlight the severe impact that poor-quality housing can have on individuals and families, and also the fragile nature of tenancy security for many vulnerable people.

As part of our response, we would like to highlight the following reports which contribute to this agenda, and look at the importance of housing quality in terms of return on investment, and its impact on mental and physical health and well-being.

[Making a Difference Housing and Health: A Case for Investment](#)

[The full cost of poor housing in Wales](#)

- 1.2 This joint response reflects the views of the Chartered Institute of Housing Cymru and Public Health Wales, drawing upon the expertise of a professionals working in both strategic and operational roles in both organisations.

2. Responses

2.1 What are your general views on the proposed new policy with regard to the issues itemised within the above Summary?

- 2.1.1 We agree in principle with the idea of simplifying the Development Quality Standards (DQR) and creating a new standard fit for the contemporary environment, which considers improved housing quality, sustainability, and a safe and secure home with minimum space standards. Although innovation and flexibility are to be encouraged, it needs to be ensured that such approaches will lead to positive outcomes for individuals, families and communities. Along with the development of new standards, it is also important to look at this in light of the importance of 'place' and the impact that the surrounding external environment can have on a home, such as access to public transport and local play areas, and feeling safe in your neighbourhood.
- 2.1.2 We support the move towards ensuring this becomes a standard adhered to by housing providers across tenures, which may help to reduce inequalities in housing experience relating to tenure. We are concerned that the standard as drafted does not sufficiently reflect the ambition for Wales to lead the way in sustainable methods or capture the ways in which household composition may need homes to change and adapt. We elaborate on these issues in the answers that follow.

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

2.2.1 The evidence for change listed provides a useful reminder of the rationale for creating a new standard. It will be important to remember that in order to address the issues within the evidence for change, the standard will need to be aligned with other measures. For example, the development of affordable homes under s.106 agreements will be helped by clarification of the standard, but equally rely on capacity within local authorities to challenge lower returns on affordable homes by a developer. With this in mind, resources to effectively implement and monitor compliance with the strategy will be of equal importance.

We agree with the need for change to ensure that housing standards meet principles associated with Lifetime Homes and other mobility considerations.

2.3 Do you think there are the benefits to the proposed new policy?

2.3.1 The simplification of the standard should help in monitoring its effectiveness in practice and its impact on the overall quality of homes constructed within its lifespan. As previously stated it may also have an impact in relation to reducing inequalities across tenures by applying a common standard for all. We would however re-emphasise the need to be much clearer on the monitoring regime that will accompany the standard.

2.3.2 The Welsh Government has announced a 'climate emergency' in Wales, and the standard puts a clear emphasis on the responsibility of organisations delivering social and affordable housing to consider the most sustainable methods in terms of both materials, skills and procurement. Homes also need to be adaptable to climate change and be able to avoid both excess cold and overheating.

2.3.3 Ensuring Lifetime Homes is incorporated within the standard is a positive step forward and will go some way towards ensuring homes in the future require less radical adaptations to ensure people can remain independent as they age.

2.3.4 The new standard should also be treated as an opportunity to promote the quality of social and affordable housing, with homes being built using cutting edge technology and design.

CIH Cymru carried out public opinion polling in 2018 and found that:

- Housing and homelessness combined is one of the top five priorities for the public
- Three in five feel it is the government's responsibility to provide a decent home for every citizen
- Just over half of all respondents believe social housing suffers more from crime and anti-social behaviour
- Two thirds are either unsure or against seeing social housing built near them

2.3.5 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

people perceive between homes of differing tenures and therefore limit the growth of stigma associated with social housing.

2.4 Do you think there are any dis-benefits to the proposed new policy?

We believe there are a number of areas where the standard could be improved or expanded upon:

More holistic view of housing standards

- 2.4.1 There needs to be a more holistic view of the entire housing environment and recognition of the strong link between housing standards and mental and physical well-being, which is supported by a wealth of evidence.
- 2.4.2 It seems timely to shape the new standard at the present time where households will keenly feel more than ever how their home and surrounding area can affect their physical and mental well-being. There is further scope for the standard to strongly reflect the impact of a high-quality home on people's health, and the need for this to be a key consideration from inception through to design and delivery.
- 2.4.3 There is the need to give strong consideration to how the standard accounts for the ways in which people are expected to live and work in the future, as highlighted by the current Covid-19 situation. For example:
 - The standard makes reference to car parking to be placed conveniently and in-line with expected levels of car use, but makes no reference to requirements to link with active travel, cycle routes etc. which themselves enable and complement more sustainable ways of living. There are also no references to measures to ensure the convenience and security of active travel methods, such as bike storage.
 - Whilst there is reference to stair lift provision, there is no recognition of a measure that may be required to keep children safe in their homes. This could include provision for stair gate fixtures, lockable cupboards for household chemicals and ensure placement of fittings do not inadvertently become "step ladders" for small children (e.g. upstairs toilet in front of a window).
 - Consideration needs to be given to pushchair and wheelchair storage, as well as the ease of child supervision such as kitchens overlooking gardens as opposed to roads.
 - Noise insulation should also meet standards appropriate for intended use and local soundscape.
- 2.4.4 Further consideration should be given to use of the word 'space' such as using the built environment for crime prevention including use of natural surveillance. For example, well-lit entry points, changes in landscaping between public and private property (paving and low-level walls), plants and green-spaces for shared community areas.
- 2.4.5 New or modified homes should be constructed with consideration of flood risk and potential exposure to radon gas and where known, the health behaviours of occupants.

Areas that are to be refurbished should be based on relevant theories, such as the Broken Windows Theory, to encourage safer, accessible and attractive environments for all populations promoting improved mental and social well-being

Delivering new homes in practice

- 2.4.6 Whilst the standard rightly emphasises the need to increase the use of sustainable and environmentally friendly methods, there also needs to be recognition of the practical challenges many housing organisations face in implementing this approach in reality. These include:
- The infrastructure to procure the services, skills and materials to build high quality sustainable homes isn't sufficiently developed in Wales
 - There is no strategic approach to developing the housing workforce in a way that helps meet aspirations to build homes in this way
 - In rural areas, SME (small and medium sized) house builders are heavily relied upon to support the delivery of social and affordable homes. However, this sector is rapidly changing, and is increasingly made up of individual contractors as companies struggle to remain sustainable, thereby making skills and services scarce
 - There is a real challenge around costs associated with delivering homes of the highest standards – and for many organisations, it isn't a case of focussing on delivering new homes, it is also the challenge of investing and upgrading existing homes at pace.
- 2.4.7 Further to this, the language in the new standard could be perceived as non-committal in some areas. For example in 'giving consideration' to modern methods of construction (MMC), suggests this could be evidenced in a number of ways, but does not promote accountability over how decisions have been made, and what factors have taken precedence in driving the decision making process.
- 2.4.8 Households need to have high quality reliable information and instruction on the application of different measures to their properties e.g. improving the energy efficiency or ventilation of homes. The standard should make reference to the need to provide easily accessible information, and link to good practice. This will help ensure that any measures aimed at reducing living costs and ensuring that homes cause little to no harm to people or the environment are not undermined.
- 2.5 What changes (if any) do you think are needed to the proposed new policy? Please explain and provide evidence for your views.**
- 2.5.1 In addition to the issues identified in Question 2.4, we believe the standard should make reference to and clearly link with other appropriate guidance and strategies. For example, a link with the [Welsh Government's own Placemaking Charter](#) developed in partnership with the housing and built environment sectors promotes a focus on:
- People and Community – that people are involved in proposals, and design includes measures aimed at helping people across their lifespan
 - Movement – Walking, cycling and public transport are prioritised to limit and reduce the dependence on private vehicles (this contrasts with the current focus in the standard on car use)

- Public realm – That streets have an identity through their design, link to other key spaces and promote interaction within communities
- Location – Housing developments are planned to reduce the need for travel and offer local amenities to maintain and enhance people’s well-being
- Mix of uses – Places have a range of purposes which provide opportunities for community development and business growth
- Identity – Valuing pre-existing distinctive qualities of places and the opportunities places have to support heritage, culture, language etc.

A stronger reflection of some of the elements in the Placemaking Charter could help to ensure the application of the standard is considered in broader wellbeing terms.

2.5.2 In consideration of the built and natural environment, the links with the Welsh Government’s planning policy through [Building Better Places](#) should also be explored.

2.5.3 There is an opportunity to reference the role of tenants and the wider community during the design, development and delivery process around new homes. The standard should give greater weight to the need to utilise people’s experiences and expertise to inform how homes look, work and feel.

2.6 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.

2.6.1 We agree with this measure in the interest of creating consistency across people living in different tenures.

2.7 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.

2.7.1 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. We believe adopting the standard across all new homes is a positive step forward. It will be important for the Welsh Government to engage all parts of the housing sector at an early stage to begin a constructive dialogue that identifies concerns about, and any barriers to adopting the policy, and ensure the case for change for businesses and customers alike is made clear.

2.8 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:

2.8.1 We are supportive of the inclusion of the Lifetime Homes requirements, although we do not consider the policy to be sufficiently inclusive at present. The Lifetime Homes requirements should be considered the base level standard for homes to be easily

adaptable, accessible and responsive to the needs of a wide variety of households. There are other requirements, for example those detailed in the Wheelchair Housing Design Guide that encourage developers to go further around accessibility (in this instance) that merit consideration. The standard could therefore make reference to additional requirements that could ensure developers continue to be ambitious in delivering homes that truly meet the needs of diverse communities across Wales.

2.8.2 Related to this, there needs to be greater clarity around how the standard increases equality across the protected characteristics. Without an understanding of the impact of the measure on people with protected characteristics, there is a real risk that we could either see homes continue to be unsuitable for some people or we could miss the opportunity to highlight where homes are having a positive impact in meeting people's needs, and promoting those aspects as good practice more widely.

2.9 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:

2.9.1 Whilst we appreciate the message intended by the proposed name, we do not believe it sufficiently reflects to housebuilders and the Welsh public that this standard is about homes that meet a high quality threshold, reflective and adaptive to the needs of a wide variety of household types.

2.9.2 With the caveat that the standard should more thoroughly reflect the elements we have outlined earlier in our response, we would suggest a name such as ‘Quality of Life Housing Standard’, or ‘Quality Homes, Spaces and Places Standard’, as a means of communicating that the standard supports households to live well within their home and community.

2.10 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?

2.10.1 We would be supportive of this with the caveat that organisations are provided with sufficient flexibility during the transition period and that it is treated as an opportunity to test how the new regulations can be met in practice.

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

2.11.1 The emphasis in the standard on sustainability should rightly go hand in hand with homes being more energy efficient. [The Better Homes, Better World, Better Wales](#) report highlighted it would cost £1bn per annum to improve the efficiency of social housing and homes in fuel poverty over the next decade. It seems vital therefore that homes built today meet standards that minimise the need for future investment and subsequent programmes of retrofitting.

2.11.2 We also support calls in the report for homes to be water efficient and resilient to the climate:

“No later than 2025, all new homes in Wales must be built to be low carbon, energy and water efficient and climate resilient. Independent checks must be made to ensure these higher standards are delivered. This will prevent the challenge to retrofit homes becoming larger and more expensive. All homes built with public sector funding should meet these standards no later than 2021.”

2.11.3 In this respect, the requirement could go further to reflect a more holistic understanding of household efficiency; the guidance should provide clear information relating to how providers of affordable housing can achieve this in practice.