

Annex D: Response Form

Invitation

You are invited to comment on the Government's proposals for a Code for Sustainable Homes.

Your views are particularly sought on the key proposals in Sections 1 and 2 and their potential impacts set out in the partial Regulatory Impact Assessment (RIA) in Annex E. It should be noted that, although all these proposals are being consulted on as part of a package of measures, they are not mutually exclusive, i.e. one or more of them could be disregarded or amended in the light of the consultation exercise.

How to respond

Comments are invited on any aspect of this consultation document. However, to assist our analysis of responses we would appreciate it if you could complete the response form below either electronically or in hard copy. Please feel free to submit additional comments, evidence and/or supporting documentation.

Responses can be returned by post or by e-mail. The deadline for receiving responses to this consultation is 6 March 2006. All responses received before the deadline will be considered.

Additional copies of this consultation document and this response form may be downloaded from the ODPM website, www.odpm.gov.uk, or obtained as hard copies from:

The Office of the Deputy Prime Minister
PO Box 236
Wetherby
West Yorkshire
LS23 7NB
Tel: 0870 1226 236
Fax: 0870 1226 237
Textphone: 0870 1207 405
E-mail: odpm@twoten.press.net

Please return your response to this consultation as soon as possible and in any event no later than 6 March 2006. Please reply direct to the contractors engaged in collation and initial analysis at:

By post:

**Code Review
CIRIA
174-180 Old Street
London
EC1V 9BP**

Or by e-mail:

csb@ciria.org

**Response form for the consultation on proposals for introducing a
Code for Sustainable Homes**

Respondent Details	
Name: Carol Thomas	Please return by 6 March 2006 by post or e-mail to: Code Review CIRIA 174-180 Old Street London EC1V 9BP e-mail: to: csb@ciria.org
Organisation: Joint Committee on Mobility of Blind and Partially Sighted People	
Address: Secretariat - Policy Dept Hillfields Burghfield Common	
Town/City: Reading	
County/Postcode: Berkshire, RG7 3YG	
Fax: 01189838206	
Email: Carol.Thomas@guidedogs.org.uk	

Organisation type (*tick one box only*)

- | | |
|---|---|
| <input type="checkbox"/> Approved Inspector | <input type="checkbox"/> Manufacturer |
| <input type="checkbox"/> Architects | <input type="checkbox"/> Trade body or association |
| <input type="checkbox"/> Civil/Structural Engineer | <input type="checkbox"/> Private individual (unaffiliated) |
| <input type="checkbox"/> Commercial Developers | <input type="checkbox"/> Professional body or institution |
| <input type="checkbox"/> Consultancy | <input type="checkbox"/> Property funder |
| <input type="checkbox"/> House or property developer | <input type="checkbox"/> Research/academic organization |
| <input type="checkbox"/> Housing Association
(Registered Social Landlords) | <input type="checkbox"/> Specific interest or lobby group |
| <input checked="" type="checkbox"/> Other non-governmental
organisation | <input type="checkbox"/> Individual in practice, trade or
profession |
| <input type="checkbox"/> Builder/other contractor
(please specify) | <input type="checkbox"/> Journalist/media |
| <input type="checkbox"/> Local authority –
Building Control | <input type="checkbox"/> Insurer |
| <input type="checkbox"/> Local authority –
Environmental health | <input type="checkbox"/> Other (<i>please specify</i>): |
| <input type="checkbox"/> Local authority – other
(please specify) | |

Please use an X in answering the following questions

Is your response confidential? Yes No

If so please explain why.

(See disclaimer on page x)

Foreword: It is appreciated that not all consultees will wish to express an opinion on every question. Where no response is given it will be presumed that consultees do not wish to contribute to the consultation on that specific matter. Where consultees strongly support particular aspects of the guidance please use the comments sections of this form to note that support.

Please note that provision is made throughout this questionnaire for you to provide additional comments. If, however you wish to provide detailed comments on any aspect of the consultation then please append additional materials and supplementary documents, clearly marked and cross referenced to the relevant questions, as necessary.

1 Do you welcome the concept of the Code for Sustainable Homes?

Comments: Yes No

2 Do you think that the coverage of six essential elements and other optional elements is correct?

Comments: Yes No

Lifetime Homes should not be an optional element, it should be included in the proposed elements.

3 Is a mix of essential and optional 'tradable' elements helpful?

Comments: Yes No

4 Do you think that a scoring system in terms of points out of 100 is workable?

Comments: Yes No

5 Do you think the concept of a one to five-star rating system is right?

Comments:

Yes

No

It depends on whether you are a developer/builder or buyer. It would be a system that members of the public could consider/benefit from, when buying a house.

6 If you are a house-builder, will you use the Code?

Comments:

Yes

No

7 Do you agree that no certification should be awarded until a post construction check to verify that the home complies with the design assessment rating?

Comments:

Yes

No

8 Do you have comments on the costs and benefits identified in the draft Regulatory Impact Assessment (RIA)?

Comments:

Yes

No

Energy:

Water efficiency:

Surface water management:

Waste during construction:

Waste during occupation and use:

Use of materials:

Other:

9 Do you have any other comments on the draft RIA?

Comments:

Yes

No

Energy:

Water efficiency:

Surface water management:

10. Do you have any other comments not covered by your responses above?

Comments:

Yes No

The government will have a duty to promote disability equality from December 2006 under the DDA 2005, by making lifetime homes as an optional element does not seem to promote disability equality. If sustainable homes are to be achieved and meet the needs of everyone (PPS1) and deliver homes where people want to live (PPS3) they need to meet a basic level of accessibility which is the LTH standards.

LTH should be a minimum requirement for all new homes in both private and public sectors as stated in the London Plan. If this they are not, such housing risk not getting planning permission in London as they would fail to meet the London Planning Policy 3A.4. Lifetime Homes, including Housing Sight recommendations are required for all new social housing in Wales. As an absolute minimum it should be made an essential element of the Code

Promises were made by the Government that the work leading to revising Part M housing would include consideration of how Lifetime Homes standards could be developed, for instance taking account of RNIB research for Wales Assembly Government on Housing design for visually impaired people and publication Housing Sight.

There is no mention in the Code of the Housing Corporation's Scheme Development Standards (SDS) which RSL's must comply with in order to get HC grant. The SDS already incorporates many of the LTH and Wheelchair housing standards.

The LTH standards have been misinterpreted in the Code as being about internal adaptability. Joseph Rowntree Foundation did make it very clear that the standards are about flexible and convenient homes for everyone not just disabled people. It encompasses both external and internal layout and design of homes.

It is unsatisfactory that up till now a national list of lifetime homes and wheelchair accessible houses to assist disabled people in trying to find suitable accommodation to meet their needs has not been considered.

It is unacceptable that the introduction ' the need for a new approach' makes no mention of how improving the accessibility (i.e. building to lifetime homes standards) can mean that people can stay in their homes living independently regardless of their disability or illness for longer. This is economically better for the government considering our ageing population and the correlation of age and disability.

The section (pg 13) on the 'cost of building to meet the Code's standards' makes no mention of the cost to taxpayers of people remaining in hospital whilst their homes are adapted to suit their needs, or the cost of supporting people in residential or nursing homes because their homes no longer meet their needs.

One of the key requirements that the government has set for the Code is that it should be readily available to the purchasers and useable by house builders. We would hope that it will also be available in alternative / preferred format for people who are not able to access the standard print version. This should also be extended to all communication and correspondence.

Thank you for your time

Please note:

All information in responses, including personal information, may be subject to publication or disclosure under freedom of information legislation. If a correspondent requests confidentiality, this cannot be guaranteed and will only be possible if considered appropriate under the legislation. Any such request should explain why confidentiality is necessary. Any automatic confidentiality disclaimer generated by your IT system will not be considered as such a request unless you specifically include a request, with an explanation, in the main text of your response.

Confidential responses will nevertheless be included in any statistical summary of numbers of comments and views expressed, although individuals will not be identified.

Names and addresses may be held in an electronic database of interested parties for the purpose of distributing future consultation documents on similar issues. However, any such details will not be given to any third party.

A summary of responses to this consultation will be published at www.odpm.gov.uk

Paper copies will be available on request.