

WELSH GOVERNMENT CONSULTATION

Mandatory quality standards for new homes. The proposed new standard will replace the current “Development Quality Requirements” (DQR) published in 2005 in response to the key recommendations of the Independent Review of Affordable Housing Supply April 2019.

Consultation Response Form

Information:

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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:

The Association is content for any information to be made public.

Questions:

Question 01: What are your general views on the proposed new policy with regard to the issues itemised within the above Summary:

Please enter here:

The Association supports the principles of the documents subject to comments made in response to the questions and agrees with the statement in the document which says

‘House sizes are becoming too small, challenging compliance with inclusive design principles such as Lifetime Homes and other mobility considerations which are not sufficiently legislated for under the Approved Documents to building regulations.’

Question 02: What are your general views on the proposed new policy with regard to the “evidence for change” itemised within the above Summary:

Please enter here:

The Association recognises the ‘evidence for change’ and is in support of the need to set new guidelines.

Question 03: Do you think there are the benefits to the proposed new policy:

Please enter here:

The benefit of the policy is that it gives clarity to the industry.

Question 04: Do you think there are any dis-benefits to the proposed new policy:

Please enter here:

The only dis-benefit is in the delivery of the proposals. The Authorities must be able to support developments that meet the guidelines without the usual delays caused by interpretation.

Question 05: What changes (if any) do you think are needed to the proposed new policy? Please explain and provide evidence for your views:

Please enter here:

No changes to the proposed policy are put forward by the Association.

Question 06: 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.

Please enter here:

The Association agrees with the use of section 106 agreements and planning conditions to ensure provision of affordable homes. However, the percentage of the total development required to provide affordable homes should be based upon square meters and not number of units. This will allow sites to be viable (which means they take place) and gives flexibility to the Authority as to what types of homes are provided.

Question 07: 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:

Please enter here:

The are only three tenures in Wales, they are Freehold, Leasehold and Shorter Term Tenancy Agreements. The Association supports the introduction of the policy on which ever basis the tenure is held on the basis that if the homes get built it is a better situation than at the present time.

Question 08: What is your opinion of the proposed minimum space standard. Please explain and provide evidence for your views:

Please enter here:

The minimum space standards are accepted by the Association as about right. They provide enough space to accommodate the furniture for each room use whilst not being excessive.

Question 09: 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:

Please enter here:

The provision of all affordable homes being either fitted or able to be fitted with full disabled access is expensive and unnecessary. There should be a percentage of homes in this category i.e. 25%. The more expensive it is to build affordable homes the less likely that they will be built as part of private development, particularly in areas where they are most needed and property values are low.

The evidence for the above can be seen from the lack of housing provision going forward. The government target has not been met since at least the mid 1990's.

Question 10: 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:

Please enter here:

The Association suggests that the title should reflect 'what it says on the tin' – therefore a title such as 'affordable homes design guidance' is more appropriate.

Question 11: 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?

Please enter here:

The Association does not support the early introduction of changes. If the changes to Part L of the Building Regulations proposed do not take place it will cause confusion and in turn this will create delays in production of more homes.

Question 12: What is your opinion on the potential introduction of a requirement that all new affordable housing should meet EPC A (SAP 92).

Please enter here:

The Association is of the view that all new homes (affordable or for private sale) should meet such standards.

Question 13: 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:

Please enter here:

The Association is very aware of the shortage of housing in both the private and public sectors. This, in our view, is due to several reasons but the main two are:

- i) The planning system being slow and unhelpful. For example years ago you could speak to a planning officer who would suggest changes to a plan and give clear guidance. This does not often happen today – the planning officers just state what they do not like but do not offer positive suggestions. This issue needs to be addressed.*
- ii) The provision of 106 benefits including affordable housing should be set at a level where the development actually takes place. Many developments have been thwarted by ‘too much being imposed by such agreements.*

Question 14: 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 favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Question 15: 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.

Question 16: 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:

Please enter your responses to questions 14, 15 and 16 here:

The relevance of the Welsh Language to this consultation is very limited. The only comment we wish to make is that estate and street names should be in both Welsh and English.

Question 17: 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.

Please enter here:

There are no additions that the Association feels are necessary taking into account Covid 19.

R A Robinson FRICS
Secretary
North & Mid Wales Association
of Local Councils