

Consultation Response Form

Your name: Elinor Weekley

Organisation (if applicable): Royal Society of Architects
in Wales (RSAW)

email / telephone number: rsaw@riba.org / 02920 228
987

Your address: Studio 111, The Creative Quarter,
Morgan Arcade, Cardiff, CF10 1AF

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:

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

We are generally supportive of the overview outlined in the summary. The more freeform nature of the new standard should allow for greater quality across the board. We feel this standard could be applied to all new homes.

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

We agree that the DQR was in need of a review. We wholly support ensuring consistency in the application of the new standard for affordable housing provided under section 106 agreements.

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

We feel the new standard will allow for greater quality across the board.

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

We have concerns around resource. There must be enough professional capacity so that the planners that write the s.106 conditions understand the rules and how best to write them precisely.

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

We feel there must be absolute clarity that the new standard is legally enforceable as part of the s.106 agreement. We would also encourage clarity over which body is responsible for assessing schemes under the new standard.

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.

Agree.

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:

We support this intention. Incorporating the standard at the planning application stage ensures the development must adhere to the principles outlined.

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

We are pleased with the encouragement of flexibility, especially given the rise of home working during and post Covid-19. Given Wales's track record of being a proving ground for good space standards, we feel the new standards should not fall below any of the standards set out in England's *Technical housing standards – nationally described space standard* (see bungalow space standard as an example here). We would welcome more information to evidence how the recommended space standards were set.

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:

We feel the ethos of design for flexibility and adaptability of the new standard is more egalitarian than the approach found in the DQR. We feel more emphasis could be given to ensure suitable outdoor space is guaranteed under the new standard (for people of all ages), both in terms of public and private spaces.

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:

We question how the new standards ensure 'beautiful' homes. A more functional title would be more appropriate. We feel the standard is more about space and quality standards than beauty. Additionally, the new standard in its intended application does not apply to all homes (only affordable homes).

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?

We broadly agree although we are cautious about unnecessary complexity with different regulations for different types of housing. Additionally, including the proposed changes in the s.106 agreement before the changes take effect could result in including a legally enforceable condition for a regulation that ultimately does not come into law.

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

We strongly agree with this proposal. This should be a minimum standard as EPC A is easily achievable.

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:

We feel other sustainability policy items should be handled the same way, i.e. done as part as the s.106 agreements (so long as the planning departments are sufficiently resourced). We encourage the use of simple and accessible staircases for safe movement of people and safe transport of furniture etc.

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 favorably 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:

We don't feel considerations about the Welsh language are relevant in the context of this new standard.

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

With home working set to continue permanently in some form for many workers, we feel universal access to Wi-Fi should be encouraged. Additionally, considerations should be made around lighting levels in homes with home working in mind.