

Consultation Paper on Proposals for introducing a Code for Sustainable Homes

Response by the Royal Institute of British Architects

Introduction

The Royal Institute of British Architects welcomes this opportunity to comment on the draft Code for Sustainable Homes.

The RIBA is one of the most influential architectural institutions in the world, and has been promoting architecture and architects since being awarded its Royal Charter in 1837. The 30,000-strong professional institute is committed to serving the public interest through good design. It also represents 85% of registered architects in the UK through its regional structure as well as a significant number of international members. Our mission statement is simple—to advance architecture by demonstrating benefit to society and promoting excellence in the profession.

The concept

The RIBA warmly welcomes the proposed introduction of the Code as a good start by the Government towards establishing a comprehensive and readily-understood system for measuring the environmental performance of all buildings.

At present, the Code is limited to new build homes and this is somewhat different from the proposed “Code for Sustainable *Buildings*” referred to in the Government’s manifesto (our italics) and called for by the Sustainable Buildings Task Group. We firmly believe that there would be great value in developing Codes to use across all building types and we urge the Government to treat this Code as a significant first step rather than a full stop.

The proposed Code does not as yet include a clear definition of a “home”. In clarifying this, we would urge the Government to include residential buildings such as student halls of residence or care homes, as these make up a significant proportion of the market.

We are pleased by the Government’s commitment, referred to in its response to Kate Barker’s review of housing supply, to develop a revised process for updating Building Regulations and to align future reviews of statutory regulations with the voluntary code. We would hope that this process can begin quickly in order to prevent a two-tier system emerging between private and public sector housing, or between housing and other building types. The Royal Institute of British Architects would be very happy to assist the Government in this work.

We are pleased that the Code is based on the established BRE Ecohomes rating system as this is credible, accepted and generally well-understood by the industry. We would go further in urging the Government to base the Code more closely on

Ecohomes while addressing some of its acknowledged shortcomings. This will build positively on the track record of Ecohomes and reduce potential confusion between the systems in the transition period.

We very much welcome the clear implication in the consultation document that the new Code will be marketed to the final consumer, as opposed to Ecohomes which was targetted only at the “trade” – developers, social landlords, architects etc. We have seen how people have been willing to buy into developments with “green” credentials such as BedZED or the Millennium Village at Greenwich. Marketability of the scheme to consumers will be vital if the Code is to rely on voluntary take-up beyond its mandatory application for new homes supported by English Partnerships or the Housing Corporation. On that basis, we would hope that the Code can be presented in a way that is readily understood by the consumer. This should generate market pull from potential home owners who will be encouraged to use the Code as a robust tool to measure the relative sustainability new homes and hence better take-up by developers as a powerful market tool. We would ask for a clear commitment about the timeline and methods for marketing the Code to be given in this respect.

While we recognise the Government’s instinct is for a gradual approach, we would have preferred the Code to be applied across the new housing market as a whole from the outset. We would urge the Government to make such a move if market forces fail to deliver significant voluntary take-up by the private housing sector.

We believe that the Government’s next step should be to set out proposals to expand the application of the Code to existing housing stock. The Government’s 2005 election manifesto made a commitment to encourage local authorities to apply sustainability standards to private homes, and we therefore recommend that the Code should be promoted as a tool for local planning authorities to set minimum acceptable standards above the regulatory minimum, as is already beginning to be the case with Ecohomes.

There is also a potentially a useful tie in between the Code and the proposed Home Information Packs and the Government should take the opportunity to clarify how this might work.

Furthermore we recommend that the Government should give serious consideration to planning or fiscal incentives to encourage householders to invest in energy efficiency measures and sustainable technology in order that the objectives of the Code can be applied to existing as well as new homes. We look forward to the Government’s promised consultation in 2007 on amendments to the General Permitted Development Order to include provisions that would make it easier to install micro-generation equipment.

The six essential elements and optional elements

We believe the coverage of six essential elements - energy efficiency, water efficiency, surface water management, site waste management during construction, household waste management during occupation and the use of materials – to be correct.

We are also content with the proposed optional elements of soundproofing, private external space, daylighting and a Home User guide. We would, however, add

transport, landscape and ecology, density and adaptability. We address each of these points in turn in this submission.

The mix of essential and optional “tradable” elements

The Sustainable Buildings Task Force drew attention to a weakness of the Ecohomes system in the ability to “trade” points for fundamental elements such as energy consumption with issues that they felt were of secondary importance.

We understand that minimum levels of performance for each of the essential elements are set only for the one-star entry level of the Code. There does not appear to be a corresponding set of specific higher levels for these essential elements that correspond to higher ratings. The Code thus appears to repeat this error as higher ratings can be achieved simply by scoring points from the entire spectrum of “tradable” and essential elements.

It is difficult to comment on the balance of the Code without having the complete and detailed points allocation set out. It is not possible at present, for example, to see what rating a home built to minimum Building Regulations thermal standards would achieve by amassing points across the range of optional issues.

We believe that each step in the ratings should have a corresponding minimum standard; at least for the key issues of energy performance and water consumption. We would suggest that the work by the Energy Savings Trust in developing revised energy efficiency standards would form a useful basis for establishing such minimum levels, particularly as these tie in with work by other organisations such as the Association of Environment Conscious Building and the RIBA on establishing an agreed set of standards above Building Regulations minima.

If this approach is not taken, we would recommend that the system should incorporate scores (or stars) for each of the essential elements – similar to a *Which?* rating for consumer products – as well as an overall star rating so that consumers can make meaningful comparisons between properties on those aspects of sustainability with which they are most concerned.

We would recommend that a thorough consultation exercise is carried out once the rating system and points allocation is established to iron out any inconsistencies. The RIBA would welcome involvement in any such exercise.

The scoring system

The range across the proposed standards does not appear to have progressed from Ecohomes 2005. The one-star level would seem to be very unchallenging as it is below an Ecohomes 2005 Pass. The three-star level would appear to be roughly equivalent to an Ecohomes 2005 Very Good rating and thus relatively easy to achieve while, in contrast, the zero carbon requirement for a home to achieve a five-star rating is a very challenging and expensive target which will be achieved by very few projects in practice. Care needs to be taken so that the one-star entry level is low enough to encourage voluntary take-up while such a voluntary system exists, but nevertheless high enough to be meaningful.

There is a danger that the four-star level will include a wide range of performance levels and will therefore include a disproportionately wide range of projects, giving insufficient differentiation in the system. A large peak in four-star ratings, masking significant differentiations in performance, would limit the legibility and therefore the marketability of the Code. We would suggest that the five-star level should be defined by its level of thermal performance (e.g. to a Pasivhaus or AECB Gold Standard) rather than whether it is carbon neutral. The rare number of homes that manage to achieve carbon neutrality should be placed in a category beyond the five currently proposed – perhaps by being marketed as a Carbon Neutral 5 Star Homes.

We would welcome further information from the Government about the proposed inspection regime. It is unclear at present by whom building performance will be assessed – whether by surveyors or other suitably qualified professionals. We recognise there may at present be insufficient numbers of such individuals to prevent a mandatory system across all housing being put in place at the outset. We would therefore welcome some indication of how the Government proposes to address that capacity issue.

Omissions

We note that transport, landscape and ecology, and density, have been omitted from the Code as compared with Ecohomes and that this decision was based on a strategic position taken of limiting the coverage of the Code to building related issues. However the omitted issues are essential elements of sustainability and it is, therefore, difficult to see how the Code can claim to be a meaningful measure of sustainability without covering them.

Transport and the available alternatives to the private car are a particular concern. While we note the reference is made to an alternative approach using the planning system, we are concerned that, at present, draft PPS3 (Housing) is noticeably weaker on transport, and in particular on car use, than its predecessor documents. Paragraph 20 states that local planning authorities should develop parking policies for their plan area. We have already proposed – as part of the current consultation on draft PPS3 – that the important objective of reduced car use should be re-emphasised and that planning policy should promote and encourage provision for alternatives to private cars. The Code is also a valuable opportunity to pursue these objectives and one strength of the Which? Report approach to a rating system would be that this issue, and potentially other site related issues, could be separated out from building related issues so that consumers can make informed judgements in these respects.

No detail is given to back up the proposal to omitting landscape and ecology issues. It is the mix of buildings, green spaces and streetscape – alongside other factors such as traffic – that is so crucial to the quality of sustainable residential environments and we would urge the Government to review this decision.

Similarly, although there are references in the consultation document to density recommendations in planning policy, there are occasions where homes are not built to a 40 dwellings per hectare ratio such as one-off homes on their own site. It seems illogical that this issue is ignored in the scoring system.

If the Government is adamant that site related issues are not to be covered in the Code, it is vital that the relevant national, regional and local planning strategies should

be thoroughly reviewed before the Code is finalised to avoid the issue slipping between the cracks.

It is unclear how the Code will be adapted to take future technological advances into account. As technology allows more homes to improve their environmental performance, there is a risk that the Code as currently proposed would soon fall behind emerging realities.

The consultation document does not stress the benefit of the early involvement of a sustainability advisor. Experience has shown that this can make a very significant difference to the overall sustainability of a project for minimal additional cost. The RIBA would be very happy to work with the Government to advise on how developers and consumers can be given high-quality advice about building performance.