



RTPI

mediation of space · making of place

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24th March 2010

Mona-Lisa Chukwuma
Sustainable Buildings Division,
Department for Communities and Local Government
5/G10 Eland House, Bressenden Place,
London SW1E 5DU

Email response sent to: thecode@communities.gsi.gov.uk

Dear Ms Chukwuma

CONSULTATION RESPONSE: SUSTAINABLE NEW HOMES - THE ROAD TO ZERO CARBON: CONSULTATION ON THE CODE FOR SUSTAINABLE HOMES AND THE ENERGY EFFICIENCY STANDARD FOR ZERO CARBON HOMES

The Royal Town Planning Institute (RTPI) and Chartered Institute of Housing (CIH) welcome the opportunity to jointly respond to the above consultation. This response was drafted by the RTPI-CIH Planning for Housing Network following an internal consultation.

The RTPI is a membership organisation representing over 23,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public. The CIH is the professional body for people involved in housing and communities. It has a diverse and growing membership of over 22,000 people - both in the public and private sectors - living and working in over 20 countries on five continents across the world. It exists to maximise the contribution that housing professionals make to the wellbeing of communities.

Whilst the RTPI and CIH do not intend formally to respond to the series of detailed questions set out in the consultation paper, we are confident that the types of measure proposed will support the long term goal of responding to climate change in the built environment. We also emphasise our view expressed in the last Code consultation, that the general approach developed for the Code represents a technically sound and widely applicable approach to reducing the carbon impact of development that is of far greater significance than (say) proposals for Eco Town standards.

The RTPI and CIH welcome the attentive monitoring and review of new and critically important standards. Recognising that the techniques and practices underpinning performance in this sphere will inevitably and significantly change over time, both Institutes are supportive of an approach where the standards are expressed both as 'objectives to be met' and 'means of implementation'. Under this model it should be possible to ensure that the objectives are met by every development proposal, whilst providing the proponent and the Local Planning Authority (LPA) with flexibility about the means of implementation, so long as they can demonstrate that objectives are met. This approach ensures that the applicant and the LPA focus thoughtfully on the performance to be achieved by their proposal whilst sustaining the potential to innovate and push the boundaries of best practice, as has already been the case with some local authorities, for example, the London Borough of Merton.

Three examples drawn from the consultation document are used here to help to illustrate where this approach has not been applied as clearly as it could be:

Whilst a commitment to a the regular review of the Code is entirely appropriate, one of the factors mentioned as being taken into account in this review is 'balancing sustainability policy aims with the practicalities of house building in the current economic climate'. We doubt that this is an appropriate element in the Code review. The Code is voluntary but has a clear objective of zero-carbon housing by 2016. If the current economic climate is adverse and progress in the application of the Code is slowed then there should be no illusion about the accelerated rate of change and adaptation that will be needed as house-building programmes revive. Whilst work in progress may be hard to alter, new post-recession programmes could readily make a fresh start with the positive experience of applying the Code as an inspiration.

The RTPI and CIH have previously expressed their support for and again reiterate the need for Government to consider 'eco-quarters' in cities and major towns and the greening of the suburbs, as well as eco-villages for our rural settlements. There could be pilots, to test the standards and locations prior to extending the measures across all new development and some good practice is developing, for instance in Birmingham and London Borough of Sutton. This more comprehensive approach would fit well with efforts to arrive at 'allowable solutions' (paragraph 86 in the consultation) where new thinking may be required to ensure delivery of the last 30% of carbon compliance.

We believe that developers may be more accepting of the Code and the Lifetime Homes element in particular if it was written to provide a stronger steer in relation to age-proofing standards, which would clearly encompass energy reductions and which should apply to all housing. One way of streamlining the Code and assisting the planning of sustainable communities would be to focus away from detailed Lifetime Homes best practice criteria, and towards more general issues that may eventually be embodied in regulations applying to all new housing and neighbourhoods. It should be helpful for instance to replace the Hea 4 checklist, that only marginally extends existing regulation, with more obvious objectives applying to dwellings of all types, selecting those that may need to become regulatory requirements as part of the Government strategy for sustainable community, lifetime neighbourhoods. Issues that arise when developments first receive planning permission but are not covered or are confused in the original or currently advised revisions to Lifetime Homes at the stage of planning residential buildings and neighbourhoods include:

- Planning new road, plot layouts and apartment building entrances and vertical cores so that the front doors (not secondary doors) of all or very nearly all new dwellings are physically accessible from the outset – these will generally require careful attention to working with the topography of the site.
- Securing where necessary, features such as short ramps or slopes for street frontage houses where developed without front gardens; platform lift ramp access to elevated entrance apartment blocks designed to integrate with existing street elevations or to surmount undercroft car parks.
- Ensuring provision of passenger lift or residents' lift access to new apartments and upper floor extra care housing and other specialist but self-contained housing units, so that all new stock can play a part in accommodating households as local people in a neighbourhood age or come to have different personal needs and tenure opportunities.
- Pressures encouraging more compact - so more affordable – homes should be balanced by specified minimum space standards internal to any dwelling for main bathrooms, entrance hallways, and kitchens and in at least one bedroom.

We trust that this response assists the Department towards its revised versions of the Standards. If you require any further assistance, please contact Andrew Matheson, RTPI Network Manager by emailing housing@rtpi.org.uk or Christoph Sinn, Policy and Practice Officer, CIH, christoph.sinn@cih.org.

Yours sincerely,



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