

## **WWF Response to *The future of the Code for Sustainable Homes - Making a rating mandatory***

WWF welcomes the opportunity to respond to the above consultation. WWF has extensive experience and knowledge of the housing sector, formerly through the work of our One Million Sustainable Homes (OMSH) campaign and recently through our One Planet Homes campaign, and our work to deliver exemplary 'One Planet Living'<sup>1</sup> Communities across the globe with our partner BioRegional.

WWF has been closely involved in the development of the Code for Sustainable Homes (the Code) as a member of the Senior Steering Group, and sits on the Zero Carbon Homes 2016 Task Force. We have consistently called for all new homes to have a Code rating, and therefore we strongly welcome these proposals and the consultation document.

### **1. Do you agree that a rating (not an assessment) against the Code should be mandatory for all new marketed homes from April 2008?**

Yes, we fully support this proposal. We understand that it would not make financial sense for developers who know their homes will fail to meet Code standards to be forced to undertake an assessment. However, we feel this absence of assessment should be brought to the buyer's attention, as indicated below.

### **2. a) Do you agree that where homes are not assessed against the Code, potential buyers should be given a document which clearly states that it has not been assessed?**

Yes, we fully agree with this proposal. This document should be prominently displayed alongside the Energy Performance Certificate (EPC) as part of the Home Information Pack (HIP) to maximise public awareness of the environmental performance of homes they may be considering buying. Homebuilders should not be able to 'hide' the fact that the property has not been assessed against the Code.

### **b) Would you prefer that this document is a zero star certificate or a standard letter?**

WWF would prefer that buyers receive a zero star certificate, as we believe this is more likely to be read as part of the Home Information Pack (HIP). It is more visually clear and striking than a standard letter. It is important that this zero star rating is sufficiently brought to home buyers' attention. Buyers should be made aware when they are buying a home the environmental performance of which does not go above the mandatory legal minimum standards.

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<sup>1</sup> One Planet Living® is a joint initiative with BioRegional. One Planet Living® is a joint initiative of WWF and BioRegional based on 10 guiding principles of sustainability. The vision of One Planet Living is a world in which people everywhere can lead happy, healthy lives within their fair share of the Earth's resources.

However, if it is felt that a more detailed explanation is required for new buyers, particularly during the months that the Code rating is new, and a standard letter could be provided as well.

- 3. Do you agree that, before making rating against the Code mandatory, we should require that all Code assessor organisations (or self-employed individuals) are able to provide Code and EPC services as a single package?**

This proposal seems highly sensible, to reduce inconvenience for the developer in accessing assessors.

- 4. a) Do you agree that the HIP would be an appropriate mechanism for ensuring homebuyers are provided with a rating against the Code for Sustainable Homes?**

Yes, as people are becoming familiar with HIPs and are beginning to accept them, it would seem appropriate and sensible for the Code certificate to be included as part of this, alongside the EPC. Also, as proposed, it will ensure that the certificate is made available to potential buyers before they make a decision, which is crucial for influencing developers.

- b) Do you think it is necessary to have legislative powers to ensure that both design stage and post-construction certificates are given to homebuyers?**

As explained in the consultation, if the HIP is used as the delivery mechanism for Code certificates there will be some circumstances where the Government will have no mechanism to require home builders to give buyers a final certificate (proving that the design stage rating has been met). Therefore WWF firmly believes it is necessary for the Government to seek new legislative powers to enable this to be enforced and we fully support this proposal.

- 5. a) Do you agree there should be a transitional period for the introduction of a mandatory rating against the Code?**

WWF agrees that a transitional period for the introduction of the rating is required. It seems somewhat unfair for homes which have been conceived, designed and planned before the Code was created to be assessed against it unfavourably.

- b) If there is a transitional period, should this come into effect for new homes that either: apply for planning permission after April 2008; or reach the Initial Notice, Full Plans or Building Notice stage of the building control notification process after April 2008?**

WWF does not have strong views as to whether the requirement for mandatory rating should be linked to the planning process or the Building Regulations, and we will leave it to others who are better placed to answer this question in detail. However, as suggested in the consultation, it would seem more appropriate to link it to planning consent, since the level of detail required by the Code matches more closely the level required for detailed planning consent. Furthermore, the holistic range of issues covered by the Code is beyond the scope of the Building Regulations and better aligned with the planning system.

We accept that this may result in less homes being captured during the transitional phase (since the building regulations route could capture homes further along the design process), however this will ensure a gradual introduction, thus also ensuring enough assessors are available and there is no hold up in the buying and selling process, which the industry and public would object to. It will be highly desirable to avoid the problems and confusion surrounding the rolling out of HIPs across the housing

sector. To this end, one clear point of intervention, e.g. application for planning, which can be anticipated properly to equip sufficient assessors, is an imperative.

**6. Do you agree with our analysis of the likely demand for assessments and that there will be sufficient Code assessors available?**

WWF believes the Government and BRE are best placed to assess the likely demand and supply of assessors. However we would urge the Government to ensure that there will **definitely** be enough assessors in place to meet demand by April 2008 as otherwise the implementation of this requirement could be held up in a similar way to the EPCs, which would be severely problematic for all involved.

**7. a) Do you agree with the principle that the Code should be changed to reflect the changes to the building and other regulations?**

Yes, we thoroughly support this proposal. It is likely that even as Building Regulations improve to incorporate best practice, new technologies, innovations and opportunities will emerge in this sector, enabling even higher standards to be reached. The Code should always be pushing the boundaries of best practice and therefore it should be improved and adapted as regulations tighten (e.g. in 2010 and 2013). Furthermore, it may become apparent that other issues should be included in the Code which are not currently. WWF reinforces its point made throughout the initial Code consultation stage that transport issues need to be incorporated into the Code at the earliest opportunity and in a robust fashion. Therefore it should be regularly reviewed.

Furthermore, it will be important to review the Code in response to reasonable feedback from developers about usability, and in light of new information and research about actual performance as it becomes available.

**b) Do you agree that the Code should be revised in light of the changing Building Regulations in 2010?**

Yes, please see above

**8. a) Do you agree that Lifetime Homes standards should be mandatory in the Code?**

WWF does not have strong feelings on this issue since it is not our area of expertise. However, part of creating sustainable homes and communities is ensuring they are flexible and adaptable for generations to come. We therefore support this proposal in principle.

**b) Do you agree that Lifetime Homes standards should be mandatory at progressively lower levels of the Code starting with level 6 in 2008, level 4 in 2010 and level 3 in 2013?**

Yes, this seems like a sensible approach.