

SD FOUNDATION RESPONSE TO ODPM CONSULTATION: CODE FOR SUSTAINABLE HOUSING

Background:

The Government has a major opportunity to secure a step change in the environmental performance of housing by reducing greenhouse gas emissions and delivering low carbon and sustainable communities. This will be essential for economic as well as social and environmental reasons. It is therefore disappointing that the proposed Code for Sustainable Housing is weaker than existing Ecohomes standards implemented by a large number of public and private bodies.

The proposed Code does not reflect the urgency of the climate change situation to avoid further deterioration in carbon concentrations and to meet the Governments own Energy White Paper policy commitments on Climate Change emissions (20% reduction by 2010 and 60% by 2060).

Fear of increased costs appears to be the prime reason for not requiring more homes to achieve a better environmental standard. However:

- 1) Retrofitting homes will be more expensive than building in low energy features.
- 2) Increased demand will lead to lower costs.
- 3) Running costs are becoming more significant as energy prices rise.
- 4) Extreme weather is already costing tens of billions of pounds in Europe through drought and flood .

Proposal:

1) The Government should ensure that its Code requires performance at least as robust as the scheme it is replacing - BRE's Ecohomes. The Code should also include the full breadth of scope of Ecohomes, or include direct reference to how these will be assessed elsewhere, to ensure that Materials LCA, Transport and Biodiversity measures are incorporated.

2) The Code should include the following energy requirements:

- The minimum Energy requirement for the Code should be Ecohomes Excellent standard (2006 version).
- The carbon target should be non-tradable, at all levels of the scheme.
- The Code should be ratcheted up quickly to meet zero-energy requirements on new build housing as the minimum standard.

3) The Government should put in place fiscal and planning incentives to promote uptake of higher levels of a Code for Sustainable Housing.

4) Use of the Code should be "required" not merely "encouraged" in Planning Policy Statement 3.

5) The Government should undertake a public awareness campaign to drive market demand for more sustainable housing.

6) The Code should be developed for existing homes and other buildings.