

Building our Future: Laying the Foundations for Healthy Homes and Buildings



Response to the APPG for Healthy Homes and Buildings Green Paper

Good Homes Alliance, 30th September 2017

Good Homes Alliance has supported and will continue to support the APPG and its actions in support of quality improvements to new homes. We support the overarching recommendations i.e.:

- Work with Government to establish a cross departmental committee for health and buildings to champion change in the sector, recognising the interaction between buildings, health, education and the economy.
- Begin building the research and evidence, starting with a focus on housing and schools, to develop a clear case for further government action on standards for new build.
- Make housing (including renovation) an infrastructure priority and develop plans for retrofitting the current housing stock that take a holistic approach to maximising health and wellbeing.

We respond to the issues as requested as follows:

Do you believe the Green Paper covers all the current issues caused by unhealthy homes and buildings? Are you able to provide any further evidence that you think should be included?

- GHA believes insufficient emphasis has been given to the issue of off-gassing of materials and products in the indoor environment. APPG attendees have given evidence of build-ups of indoor pollutants whose effects are exacerbated by poor ventilation and poor construction practices. Evidence includes ZCH/NHBC 'Ventilation and Indoor Air Quality' report, chaired by current Chair of Good Homes Alliance, Lynne Sullivan OBE. ⁱ
- Overheating is mentioned in passing in relation to climate change and renovations – but overheating is a current issue for new housing and health. See evidence from GHA and ZCH etc. ⁱⁱ

Do you believe the Green Paper has identified the main problems and solutions in creating healthy homes and buildings? Are you able to provide any further issues or solutions that you think should be included?

- To GHA's knowledge, the recommendation regarding the cross-departmental committee has not been discussed at the APPG. Whilst this could improve the cross-departmental-budgets possibilities, in the meantime the Building Regulations should include requirements on IAQ (the Sustainable Buildings Act

gives the necessary vires) and arguably there should be more in the ADs on limiting VOCs and other pollutants. In our view there should be statutory requirements for reporting performance in use across a range of metrics (energy, air quality etc.) and the compliance regime should require evidence of performance in use. There could also be a requirement for indoor sensors/monitors for IAQ comparable to, say, carbon monoxide sensors. (Note: in Scottish Building Standards, an indoor CO₂ sensor is a requirement in homes).ⁱⁱⁱ

- Damp is highlighted as an indoor pollutant, but the control of moisture in new and existing buildings will only be achieved by better quality design, construction and operation. The issues raised on construction quality by ZCH on the performance gap should be referenced - they also highlight the importance of 'energy literacy' in the industry, and energy literacy should include ventilation and IAQ literacy.^{iv}

Do you support the recommendations made in the draft Green Paper? Are you able to provide additional recommendations, including specific recommendations for specific issue areas

- GHA believes, additionally that there is a need for urgent Building Regulations review in relation to the issues highlighted by the report and available evidence. GHA believes the current focus of Building Regulations review is on fire safety. We believe our issues are also paramount.
- We also need urgent Building Regulations review in relation to compliance regimes, reporting mechanisms and metrics.
- Need urgent Building Regulations review in relation to indoor monitoring sensors: there is a potential alignment with 'smart' sensors on personal phones.
- Planning approval for new homes should be conditional on incorporating Healthy New Towns guidance to also include indoor criteria (currently more focussed on external and amenity issues).

What actions do you believe are needed in order to achieve the recommendations in this paper?

- GHA believes the APPG should support and lobby for the importance of building regulations – as opposed to seeing them as 'red tape'.
- Support and lobbying for better quality control procedures, such as outlined by the Quality Mark proposals in the Bonfield Review. Any public-purse-subsidy projects – INCLUDING those subject to Help to Buy – should have verified compliance as a requirement of funding.
- Cross-departmental understanding of the synergy between productivity and health and a quality low-emission built environment.
- Support and lobbying for standards which are not lessened as a result of leaving EU.

i)

http://www.zerocarbonhub.org/sites/default/files/resources/reports/Mechanical_Ventilation_with_Heat_Recovery_in_New_Homes_Interim_Report.pdf

http://www.zerocarbonhub.org/sites/default/files/resources/reports/Mechanical_Ventilation_with_Heat_Recovery_in_New_Homes_Final%20Report.pdf

ii)

<http://goodhomes.org.uk/wp-content/uploads/2017/08/REPORT-GHA-Preventing-Overheating-FINAL-140217-2.pdf>

<http://www.zerocarbonhub.org/sites/default/files/resources/reports/OverheatingTheBigPicture-ExecSummary-Screen.pdf>

iii)

<http://www.gov.scot/Resource/0052/00521751.pdf>

iv)

http://www.zerocarbonhub.org/sites/default/files/resources/reports/EndofTerm_Summary.pdf