Response to

Contents of the Home Information Pack A Consultation Paper

from UK Metric Association

0. Executive Summary

The UK Metric Association advocates the inclusion of accurate, metric dimensions and areas, together with a floor plan, as part of the proposed Home Information Pack.

The UK Metric Association (UKMA) is a single-issue organisation whose basic aim is the full adoption of the international metric system in the UK. We consider the correct use of metric units to be a clear and transparent form of consumer protection. This applies equally to the marketing of flats and houses.

Good consumer protection requires (amongst other things):

- a single, standard system of measurement units,
- accurate and verifiable information, and
- a consistent method of presenting this information (section 1.1)

The proposed Home Information Pack goes some way to remedying current gaps or inadequacies in the information provided in the residential property market. However, the Government's consultation draft does not deal with the crucial issue of the <u>size</u> of properties.

Current practice in the UK is to describe properties in terms of the number of "bedrooms". This is inadequate since rooms vary in size and use, and the description ignores rooms not classified as bedrooms. It gives little reliable information on the size of a property or the uses to which rooms can be put. Indeed a British home buyer is provided with less standard quantitative information than a buyer of a domestic appliance or motor car. UKMA therefore proposes that there should be a standard method of accurately stating the size and layout of properties offered for sale (section 2.2).

It is proposed that the standard information to be provided should be in three categories:

- mandatory information for all properties e.g. room dimensions and floor areas
- information which is mandatory <u>if relevant</u> e.g. size of garden (of a house), floor level (of a flat)
- optional information e.g. date of construction/extension

It is also recommended that this information should be accompanied by floorplans of the property at 1:100 scale and of the plot at an appropriate scale, together with a northpoint (section 3.1).

UKMA considers that the additional cost of providing this information would be marginal to the substantive costs of the Home Information Pack. This is because, if the surveyor is already on site to assess building condition, the taking of room measurements would be a minor extra operation. Indeed, some of the required measurements are already included in the Government's initial proposal (e.g. external floor area for building insurance purposes, room volumes for the proposed home insulation and energy rating). Moreover, by using a modern computer-aided design (CAD) program, surveyors could quickly and economically translate onsite measurements into a basic floorplan (section 3.3).

UKMA recommends that any such information should be provided exclusively in metric units (section 3.4). This is because

• it is simpler to calculate and compare floorspace areas using metres and square metres (and hectares for very large plots)

- fair comparison is facilitated if all sellers and buyers use the same system, without the added complication of conversion
- most foreign buyers will only be familiar with metric units
- drawings required for planning permission and building control must be expressed in metres and at metric scales
- most prefabricated kitchen, bathroom and bedroom furniture, floor coverings and "white goods" are supplied in metric modules and dimensions
- UK law requires all official documents to be in metric units

The information should be presented at an appropriate and consumer-friendly level of accuracy (section 3.5).

UKMA proposes that all this information could be neatly summarised in a "Homelabel", which would enable buyers to compare properties quickly and easily. This would be similar to the sort of standard technical data which must be provided by sellers of electrical appliances and cars. An illustration of a possible design for a "Homelabel" is offered (section 4 and appendix).

Much of the above information would remain constant throughout the life of a building (unless building alterations are carried out), and where alterations do take place, there will normally be surveyors' or architectural drawings available (section 5.2).

1. Background

1.1 UK Metric Association (UKMA)

This response to the consultation on the *Contents of the Home Information Pack* is submitted by UK Metric Association (UKMA). UKMA is an independent, non-political, single-issue organisation which advocates the full adoption of the international metric system (SI) for all official, trade, legal, contractual and other purposes in the United Kingdom. UKMA is entirely funded by members' subscriptions and donations.

UKMA regards the appropriate use of metric units as a clear and transparent form of consumer protection. Consumers are best served through the application of the following four principles with respect to the use of measurement units:

- Standardised usage of units of measurement to allow accurate and transparent comparison of one offering with a competitive alternative
- Properly calibrated measuring instruments at the measurement stage
- Standardised unit prices if appropriate (e.g. price per square metre)
- A consistent way to represent price and measurement when labelling or advertising goods.

1.2 Aims of Home Information Pack

The Government is committed to making it easier to buy and sell residential property in England and Wales. One of the cornerstones of this commitment is the provision of a home information pack. The purpose of the home information pack is to bring together information relevant for a home purchase decision at an early stage in the purchasing process.

The home information pack should therefore be not only a means of speeding up the conveyancing process, but as a means of providing the consumer with objective and useful information that can be used to decide whether a given property represents good value. Information in the home information pack should be presented in a clear user-friendly manner.

1.3 Weights & Measures Legislation

The Weights and Measures Act of 1985 regulates transactions sold by reference to units of measurement. While this primarily applies to consumer items such as groceries and DIY supplies, we believe that this also applies directly to offering property rented by area. This legislation precludes selling items by the square foot as a unit of measurement.

There are other transactions where the sale price is not directly related to units of measurement, and which are thus not directly subject to the sanctions of the Weights and Measures Act. Nevertheless DTI's "Guidance to Business on the use of Metric Units of Measurement and the EC Units of Measurement Directive" (http://www.dti.gov.uk/ccp/topics1/guide/metricbus.pdf) states the following with reference to such transactions.

These transactions are therefore not subject to any express sanction under provisions in UK legislation that regulate the use of units of measurement. Business should, however, recognise that the scope of the EC Units of Measurement Directive is wider than regulated transactions. It provides for the use of metric units as the primary system of measurement from 1 January 1995

for "measuring instruments used, for economic, public health, public safety or administrative purposes" (Article 2), unless one of the derogations...applies.

The following are among the consequences that could follow for those non-regulated transactions that continue to use imperial units:

...

The validity of a non-regulated transaction involving the use of imperial units could be liable to legal challenge by a party that argued that the transaction could not be upheld or enforced.

Our view is that this advice applies to the majority of transactions involving the sale of residential and commercial property.

1.4 Scope of UKMA Response

This response focuses almost entirely on Chapter 9 of the consultation document. Firstly, UKMA agrees that the home information pack should contain an objective report on the condition of the property; home condition report (HCR). Secondly, UKMA says that the HCR should be complemented by a proper report of "vital measurement statistics" on the property. The lack of a properly defined statement of the size of a property is a serious deficiency to the currently proposed home information pack. The rest of this document focuses on addressing this issue.

2 Choosing a Home

2.1 Location, Size and Condition

The purchase of a home is by far the most significant transaction that people are likely to undertake in their lives with major financial and lifestyle implications. Apart from budgetary limitations, the three critical factors that are likely to determine whether a property is desirable for the purchaser are location, size and condition.

Location is a well-known factor in determining a home purchase. A prospective purchaser is likely to assess factors such as locality of shopping, school or leisure facilities; access to public transport or main roads; sources of noise and pollution as well as the general "feel" of a neighbourhood. Although some location issues e.g. distance to amenities can be measured, requirements for location are very individual and are assessed subjectively.

Size of a home is an essential consideration. A prospective purchaser needs to know whether there is sufficient accommodation and whether it is partitioned and laid out in a useful way. Similarly the size of a garden, garage or parking space is important for most purchasers.

Lastly the condition of a property is important. If repairs or remedial works are necessary these should be known, and budgeted, before the purchase. If a buyer needs to reckon with further financial outlays to fix a home it is important that basic information is available to allow the incremental costs to be estimated.

In many cases buyers of residential property will wish to consider improving that property following a successful purchase. Common plans include kitchen refurbishment, new floor

coverings and renewing the garden. A prospective buyer needs to estimate the budget required for possible improvements in order to assess the value of a possible property purchase.

2.2 Current Practice

Today's purchasers are reasonably well served with regard to information on location and condition. Estate agents frequently have information available on a locality and it is possible for a prospective purchaser to readily get a subjective feel for an area. Today, the condition of a property can be professionally assessed by contracting a surveyor.

In contrast to this, purchasers are not generally well served with information on the size or layout of a property. There is currently no standard method of providing this information. Property advertisements commonly give the number of "bedrooms", but this information is of limited value since rooms can vary greatly in size and use. When room dimensions are provided, they are sometimes given in imperial measures, sometimes in metric, and sometimes in both. Where, exceptionally, a floor plan is provided, it is normally accompanied by a disclaimer "not to scale", which means that the plan cannot be reliably read in either imperial or metric dimensions. Floor areas are rarely given (even though they are common practice in commercial property advertisements).

As purchasers do not normally have the opportunity to take their own measurements or draw their own floor plans, they are forced to rely on their memory of one or sometimes two brief visits, together with such (unverified) information as the estate agent may provide. This situation could reasonably be described as "buying a pig in a poke".

The fact that prospective buyers are not necessarily complaining about the size data they receive is not an indication that they are well-served. Indeed it is probably an indication that the British market provides consistently poor information and consumers are not even aware of what could usefully be provided. Property buyers in countries as diverse as Australia, France, Germany and the United States are used to receiving standard information on the size of residential properties. Britain sadly has fallen well below international norms.

2.3 Finding Property on the Worldwide Web

A new way of searching for property is to use the worldwide web. Most British property websites permit searches of residential properties based on location, price and number of bedrooms only. As already mentioned the number of bedrooms may not be a very suitable indicator of the size of a property. Furthermore some purchasers may have specific ideas about the floor-space and garden-space that they would like. Unfortunately the lack of standardised measurement of areas in a property of sale hinders searches based on desired area. The use of the worldwide web for marketing property would be helped by a standardised and professional approach to measurement.

2.4 Comparison with Other Purchases

With regard to size information today's home purchaser is considerably worse off than purchasers of washing machines or cars. Most household appliances are required by law to be sold with an Ecolabel. This label provides standardised measurement information on the capacity and energy consumption of an appliance. The label allows these quantities to be taken

into account as part of the purchasing decision. An extract from a washing machine label is shown for illustration

Energy consumption	1.05
kWh/cycle (based on standard test results for 60°C cotton cycle)	
Actual energy consumption will depend on how the appliance is used	
Washing performance A: higher G: lower	A BCDEFG
Spin drying performance A: higher G: lower	A BCDEFG
Spin speed (rpm)	1400
Capacity (cotton) kg	5.0
Water consumption I	5.5

Similarly somebody buying a vehicle will find key technical information about the vehicle described in the owner's documentation.

2.5 Home Information Pack

The current proposal for the Home Information Pack addresses a number of key issues such as gathering information on title, standard searches, planning consents and warranties. The important issue of property condition is addressed in the House Condition Report (HCR). A very welcome development is the introduction of an energy assessment as part of the HCR.

It is unacceptable that the proposed Home Information Pack contains no information on the size or layout of the home. This is a serious omission as the size of a property is one of the most crucial factors in deciding on a house purchase. This would have the unfortunate effect of preserving the inadequate status quo with regard to size and layout information to the detriment of the consumer.

3 Proposal for Improving Home Information Pack

3.1 Standardising Size and Layout Information

The introduction of the House Information Pack is an opportunity to both streamline home transactions in England and Wales but also to provide enhanced consumer protection. UKMA therefore proposes that the definition of the pack be extended to include standardised size and layout information.

There are some measurements, internal and external, that are extremely important to potential home purchasers. These should be provided as part of the Home Information Pack and are listed in sections 3.1.1, 3.1.2 & 3.1.3. The view of UKMA is that there are three categories of measurement:

- a) measurements that should be compulsory for all residential property sales,
- b) measurements that should be compulsory if appropriate for a sale

c) optional measurements that are useful to prospective buyers but are not sufficiently important to be mandatory.

3.1.1 Essential Area Information

Two measurements that are essential to adequately describe the size of a property are internal floorspace and, for properties such as houses and garden flats, the area of the plot on which the home is built.

Internal floorspace is an essential indicator of whether a home provides adequate accommodation for a prospective buyer. Although indicating internal floor area is rarely, and inconsistently, quoted when selling residential properties in Britain, it is normal practice elsewhere in Europe, in North America and Australasia.

There are several ways in which floorspace can be specified:

- 1. Gross external floorspace
- 2. Gross internal floorspace
- 3. Effective internal floorspace

Gross external floorspace is a metric used by insurers to prepare quotes for building insurance purposes. However, for a prospective home buyer, it is often a rather crude indicator of the size of the accommodation available *inside* the property.

A more useful indicator is internal floorspace, which is the sum of the internal areas of every room in the home. Since rooms are routinely measured when a property is put on the market the only incremental effort is the calculation of the areas.

In some properties, the internal floorspace may not fairly represent the amount of usable accommodation. Specifically, oblique ceilings can reduce the effective floorspace of a property. When measuring the area of rooms with oblique ceilings, UKMA recommends that the "effective area" should be calculated based on the area of floor with 2.0 m or more ceiling height

UKMA therefore recommends that the consumer is best served if provided with plot area, gross internal floorspace and effective floorspace.

3.1.2 Plot Information

The plot area is not required for many flats that are sold. However, plot information should be compulsory for garden flats or for commonhold flats where shared plot ownership is sold with the flat.

In addition to the total plot area, the following measurements are relevant for prospective buyers:

- a) Plot dimensions
- b) The footprint area of buildings on the plot
- c) The driveway area.

The footprint and driveway areas allow a prospective purchaser to put into context the remaining usable area.

3.1.3 Internal Dimensions

Key internal dimensions include:

- a) Internal dimensions of rooms
- b) Heights of any low ceilings
- c) Internal floor area of each level in the property
- d) "Effective" floor area of each level in the property.

UKMA considers that it is essential to properly take account of low ceiling heights. Low ceilings – while charming in old properties – may be inconvenient for some purchasers. UKMA recommends that if ceiling heights are lower than 2.2 m, that the ceiling height is measured and specified in the home information pack.

3.1.4 Layout Information

The layout of a building can have a significant impact on its utility. The layout is best described using a floorplan that shows each level in a suitable scale. UKMA recommends that as a standard a 1:100 scale is used for representing residential property layout.

Additionally it is valuable to provide information of how a home fits into the plot with which it is sold. The orientation of a property can have a significant effect on its desirability in terms of sunlight and shade. In addition to a floorplan, it would be valuable to supply a plan that shows how a home is located with respect to the property boundary. Such a plan should ideally include:

- 1. A northpoint
- 2. A footprint of any buildings on the property
- 3. Location of a driveway or other parking space
- 4. Location of trees
- 5. Location of boundary fences and hedges.

A property if either recently-built, sold off-plan or recently-extended should have up to date architectural drawings available. Subject to satisfying any copyright restrictions, these drawings could be submitted as part of the Home Information Pack.

3.1.5 Access Information

Access information, while not normally needed for houses is an important consideration for flats – other than on the ground floor. It is necessary to indicate whether access is by stairs or by lift and whether the access is suitable for disabled people.

3.1.6 Additional Information

Some information may be useful for potential property buyers but should not be compulsory. Examples of such information include:

- a) Year of build or extensions
- b) Noting high ceilings as a room feature e.g. those over 3 m.
- c) Dimensions of low, narrow or wide doors
- d) Dimensions of large patio windows/doors
- e) Dimensions of a terrace
- f) Elevations of highest and lowest points on a plot relative to a reference point.

3.2 Providing Size and Layout Data

Unless up to date architectural drawings are available, size and layout data should be independently and professionally surveyed. The data can be gathered on site at the same time as an inspection for the HCR. Many of the proposed compulsory measurements overlap with measurements that are necessary for building insurance and for the energy efficiency assessment.

In the event that recent architectural drawings are available, they should be accepted as an alternative source of layout data for the home information pack; the surveyor should simply confirm that that the drawings are current and extract the relevant measurements from the drawings. Since the copyright of the architectural drawings will be with either the architect or housing developer, it is desirable that the Government negotiates standard prices for the home information pack drawings with RIBA.

3.3 Cost Implications

UKMA acknowledges that the provision of verified information on dimensions and areas, together with the drawing of an accurate floor plan, will add to the cost of the Home Information Pack. However, UKMA considers that this cost need not be significant in relation to the obvious benefits.

The cost would primarily be the additional time required for a surveyor to perform the following operations:

- take measurements of internal dimensions (typically, two measurements per room) while on site and record them (preferably using a hand-held computer), and
- input this data into a standard Computer Aided Design (CAD) programme.

Neither of these operations need be particularly time-consuming. There will be no additional travelling time (as the surveyor will already be on site), and to take measurements at the same time as inspecting condition of windows, damp proof courses, floorboards, etc would become automatic (rather like a doctor taking a patient's blood pressure while investigating other symptoms). The draft Home Condition Report already requires "gross external floor area" for building insurance purposes. Back in the office, the use of a CAD programme to draw out the recorded data would be a minor extension to the completion of the standard report form proposed in the Government consultation document.

UKMA therefore believes that the marginal additional costs of our proposals could easily be absorbed.

3.4 Why Metric

Although it is common practice for Estate Agents to provide size information in imperial units, UKMA strongly recommends that size information in the Home Information Pack be exclusively in metric units. There are four practical reasons for doings so:

1. Consistency with planning practice

Any plans for new buildings or extensions must be submitted for planning permission using metric dimensions in England and Wales. Building regulations are specified in metric units. Since building plans could be used as part of the Home Information Pack it is essential that there is consistency between measurement units used to describe a home and those used in plans.

2. Consistency with the supply of home improvement materials
If a prospective purchaser is contemplating home improvements e.g. new kitchen units, new floor coverings or turf they will need to budget for products that are sold exclusively in metric units.

3. Legal

As noted in section 1.1 although home buying is a non-regulated transaction (in terms of Weights and Measures Act), the use of imperial units could mean that the transaction is subject to a legal challenge.

4. Consumer Protection

For consumer protection it is important to provide consistent, standardised information. This means that the information should only be provided in a single set of units. Calculating in metric is far simpler for the consumer.

3.5 Presentation of Units

UKMA recommends that standard practices are specified for presenting "vital statistics" of a property. Both the units used and the precision of the data presented need to be standardised in order to support meaningful comparisons of property descriptions. UKMA makes the following recommendations:

- a) Internal dimensions are presented in metres accurate to two decimal places (centimetre accurate);
- b) Plot dimensions are presented in metres accurate to one decimal place (except for larger dimensions of > 50 m when rounding to the nearest metre is acceptable)
- c) Areas are presented in square metres (m²)
- d) Very large areas (>10,000 m²) may be presented in hectares to two decimal places.

Although architectural drawings specify dimensions in millimetres, the usage of metres proposed above is much easier for a prospective buyer to comprehend. Millimetre accuracy may be essential for designing a house but is more precise than necessary for a house buyer.

4 "Homelabel" Proposal

Since size-related information is important for prospective buyers to compare one property with another UKMA suggests that "vital statistics" of a property are presented in a standard format. This provides the purchaser with a transparent, consistent representation of information that allows ready comparison of one property with another. UKMA proposes that a *Homelabel* analogous to the Ecolabel for household appliances is used to summarise quantitative information on a property. UKMA thinks that for 99% of residential properties, the measurement information can be summarised in a standard label format on a single double-sided sheet of A4 paper.

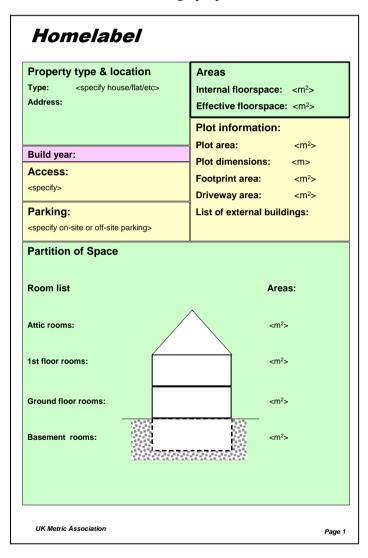
The *Homelabel* could either be attached to the Home Condition Report or issued as a standalone document within the Home Information Pack. In the former case, it could be used to summarise some HCR information such as utility services and energy rating in a quickly read format. In the

latter case only measurement information could be provided; it would be assumed that the longevity of the data is greater than that of the HCR (see 5.2).

The use of standard measures such as internal floor area or plot area in the *Homelabel* can support providing home data electronically to prospective sellers. Residential property is increasingly marketed via the worldwide web. Property searches can be made efficient by using standard metrics as criteria with a property website search engine. If the measurements are standardised, consumers have assurance that they are comparing like with like.

4.1 Homelabel in a Nutshell

The format for the *Homelabel* shown below is intended to illustrate how it could work. It is not intended to be an actual design proposal.



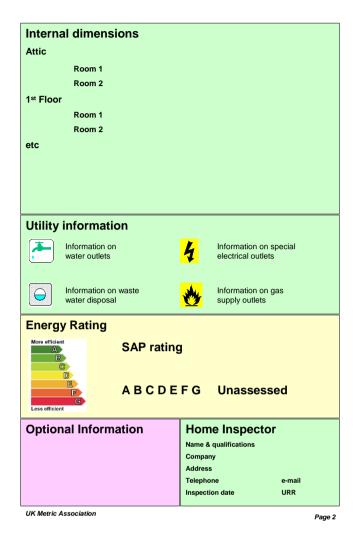
Boxes coloured in light green are for compulsory information e.g. type & location

Buff-coloured boxes are for information that is compulsory if relevant

Boxes in light mauve are for optional information.

A pictogram aims to illustrate the partition of space between different levels in the property. Obviously the pictogram will vary according to the type of building.

The pictogram helps to show how area is distributed and on which levels rooms are located.



Internal dimensions are listed by storey and by room.

The location of water and gas supplies can be indicated. The type of waste water disposal can be listed. The location of special electrical outlets e.g. cooker sockets can be identified.

Just as the Ecolabel includes an energy rating, it is logical to include an energy rating in the Homelabel

Like the HCR, the Homelabel should be only prepared by an authorised inspector.

4.2 Parking, Utility Service and Energy Information

Although the *Homelabel* is proposed to provide a quick user-friendly summary of the measurements of a property, there is no reason why additional information could not be usefully included for prospective buyers. In particular, UKMA thinks that parking, utility service and energy rating information would be usefully included.

Parking is an important consideration for many property purchasers. A *Homelabel* could usefully describe how many vehicles could be parked on the property and whether there were rights to use parking spaces in either communal areas or on the road.

Information on the links to utility services could be quickly summarised. Key information includes:

- a) Water supply. Which rooms have water supplies? Are there any outside taps?
- b) Waste water. Is waste water through mains drainage or through a septic tank?
- c) **Electricity.** Which rooms have non-standard power supplies e.g. cooker supplies?
- d) Gas. Which rooms have gas outlets?

Since the *Homelabel* includes specification information on a residence, it can usefully incorporate the energy rating. The consultation document refers to both the SAP rating (1 to 120) and the A to G rating. Both ratings could be included in the *Homelabel*. Consumers would be used to seeing similar information given on appliance Ecolabels so this consistency is beneficial.

4.3 Illustration of Homelabel Proposal

To illustrate the flexibility of the Homelabel concept two ficticious examples have been created. They are: a) a 3-bedroom semi-detached house and b) a 2-bedroom flat. These examples are in the Appendix.

5 Additional Feedback

5.1 Properties Marketed "Off Plan"

Standardised size and layout information as proposed above, is relevant for almost every type of property. For properties marketed "off plan" it is especially important that consistent and user-friendly data is provided to prospective buyers. UKMA recommends that "Off Plan" properties are required to be marketed with a *Homelabel* and 1:100 scale drawings.

5.2 Longevity of Size & Layout Data

The consultation addresses the issue of longevity of data provided as part of the home information pack. Unlike the condition of a property, size and layout data does not normally change unless major work is undertaken such as building an extension or moving/adding/removing and internal wall.

Providing that the size and layout data has been professionally prepared, and unless structural, utility or energy saving modifications have taken place, there should be no need to limit the longevity of the data. If a property has been altered or extended with resulting changes to either the size or layout it should be re-measured.

6 Conclusions

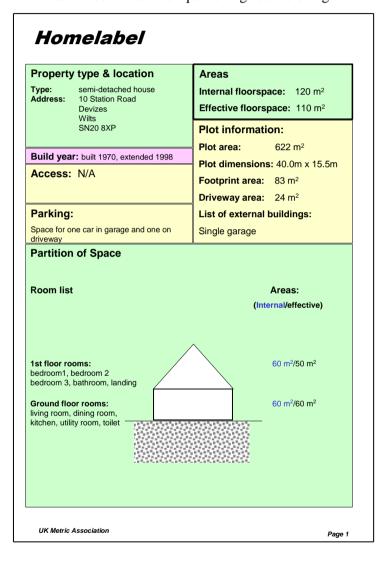
In conclusion, UKMA believes that the above proposals would be a modest and cost-effective extension to the Home Information Pack as proposed in the Government's consultation paper. The benefits in terms of enabling easy comparison of essential basic information about the size and layout of properties would be much appreciated by purchasers. UKMA believes that after a short period of familiarisation, the players in the residential property market would wonder how they previously managed without such a simple and obvious tool.

Appendix: Examples of a "Homelabel"

The following layout of a *homelabel* aims to illustrate how vital statistics on a property can be presented in summary form.

Example 1: Semi-detached House

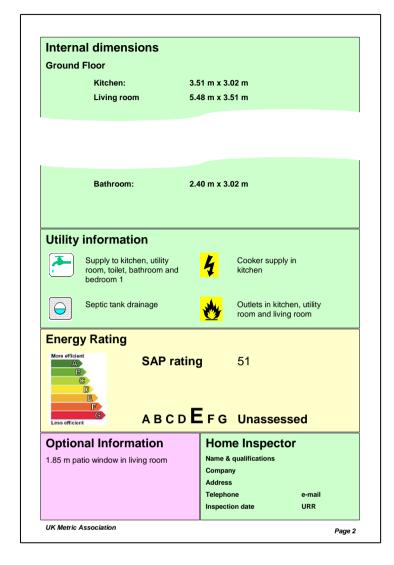
The following example aims to show how the *Homelabel* concept can be applied to a house where some rooms have oblique ceilings due to being in the roofspace.



Space lost due to oblique ceilings is indicated by the difference between internal and effective floorspace

Footprint area includes the gross external floorspace of the house plus the external area of the garage.

The first floor is indicated by a triangle since effective area is lost by oblique ceilings



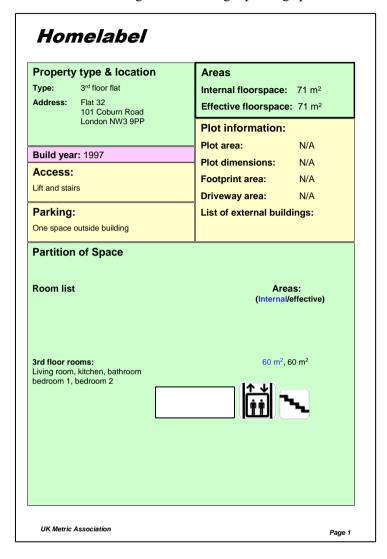
Room measurements specified, listed by level in the home

Details of the utility services are given. The fact that waste water goes to a septic tank is noted.

The energy rating is expressed both in terms of SAP and A-G scale.

The width of the patio door is provided.

The second example illustrates how the *Homelabel* concept can be applied to a 3rd floor flat which is sold with right to use a single parking space.



The internal and effective floorspaces are the same. No area is lost due to oblique ceilings

The land on which the flat is built is not part of the sale. Plot information is not applicable

Parking rights are noted.

Pictograms are used to indicate access to the flat by either lift or stairs.

