

**The Rt Hon David Cameron MP**  
**Prime Minister**  
10 Downing Street  
Westminster  
London  
SW1A 2AA

7th March 2014

**Unintended Consequences of the Housing Standards Review for the Timber Sector**

Dear Prime Minister,

I am writing on behalf of the timber sector to express concern at the direction of the Housing Standards Review as announced in your recent speech at the FSB and the unintended consequences that this may have on the timber sector.

The timber supply chain is a thriving part of our economy with forests, sawmills, merchants and woodworking companies representing a combined turnover in excess of £10 billion. With a spread of SME and large businesses, the timber industry provides much needed employment in often rural areas of the UK. In joinery we boast the highest per capita rate of apprenticeships in the construction sector.

Timber provides a fantastic, simple and natural way of absorbing carbon - locking it up and replacing more carbon intensive alternatives. Effective forest management and encouraging use of natural and renewable materials can make a huge contribution to meeting our greenhouse gas emissions targets and helping to achieve the Industrial Strategy aspiration of a 50% reduction in greenhouse gas emissions in the built environment by 2025. As a simple example, choosing timber windows can save around one and a half tonnes of CO<sub>2</sub> in the construction of an average home.

Modular timber systems and new technology such as Cross Laminated Timber structures are also starting to push the boundaries and offer huge potential to speed up construction.

We see benefit in the Review and the simplification it delivers. We are, however, concerned that cutting the Code for Sustainable Homes and leaving a void related to material choice is a retrograde step. New standards related to "embodied carbon" are emerging from Europe and processes like BIM are improving measurement and reporting. The 2010 report on low carbon construction for HM Government by the Innovation and Growth Team (IGT) emphasises that embodied carbon is an important factor that must be brought into the systems used for appraisal of projects and hence into the design decisions - this is further emphasised through the launch of Embodied Carbon Week in April. Wholesale removal at this vital point would not impact on house building levels, but could lead a race to the bottom driven by optimising land value and profit in the House Building Sector. This could in turn have a devastating effect on the timber market, impacting upon investment now and ensuring that, when the EU Regulation drives necessary change, it will be the importers of manufactured wood products who benefit (again a retrograde step when we look at the goals of the Industrial Strategy).

The Housing Standards Review Challenge Panel noted that this area "has not been fully considered" and the Environmental Audit Committee cautioned Government to think again before demolishing the Code for Sustainable Homes, recognising its "big success in driving up home building standards, delivering local choice and supporting green exports. Building materials manufacturers in the UK told us that they use the Code as a green kitemark when they sell their products abroad."

We urge you to step in and ensure that a taskforce is set up to look at the valuable contribution material choice and embodied carbon can make to our housing stock, for both new and refurbishment work, and that any change to the status of the Code is carefully managed in the interim. This will help to guarantee a clearer future for our industry and fuel the investment in jobs and technology needed to realise this.

Yours faithfully,



**Iain McIlwee**  
Chief Executive  
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### **The UK Timber Industry Associations' Accord**

There are 14 signatories to the *Timber Industry Accord*. From windows to roof trusses, a wide variety of wood and wood products are represented.

The principle of the Accord is for signatories to share their resources, collaborate in areas of common interest and communicate their aspirations to each other and the industry. Accord members have contributed their expertise to a wide range of initiatives and projects including *Grown in Britain*.

The timber supply chain is a thriving part of our economy representing a combined turnover in excess of £10 billion and consisting of a spread of micro-businesses, SMEs and large corporations which operate throughout the length and breadth of the UK.

### **British Woodworking Federation**

**Confor**

**Glued Laminated Timber Association**

**Structural Timber Association**

**Timber Packaging and Pallet Confederation**

**Timber Research and Development Association**

**Timber Trade Federation**

**Trussed Rafter Association**

**UK Forest Products Association**

**UK SIP Association**

**Wood for Good**

**Wood Panel Industries Federation**

**Wood Protection Association & Timber Cladding and Decking Association**

**Wood Window Alliance**