

Delegated decision

January 2020

**Council's Response to the
Government's Consultation on The
Future Homes Standard**



Geoff Paul, Interim Corporate Director of Regeneration and Local Services

Councillor Carl Marshall Cabinet Portfolio Holder for Economic Regeneration

Councillor John Clare Climate Change Champion

Electoral division(s) affected:

Countywide

Purpose of the Report

- 1 The purpose of this report is to agree the attached response to the Government's consultation on The Future Homes Standard: changes to Part L and Part F of the Building Regulations for new dwellings. This consultation closes at 11:45am on 7 February 2020.

Executive summary

- 2 The government are consulting on The Future Homes Standard which includes proposed options to increase the energy efficiency requirements for new homes. The Future Homes Standard will require new build homes to be future-proofed with low carbon heating and 'world-leading' levels of energy efficiency which it is proposed will be introduced by 2025.
- 3 The key purpose of the consultation is to seek views on proposed changes to Part L (Conservation of Fuel and Power) of the Building Regulations for new homes and the associated statutory guidance (Approved Document L Volume 1). In particular it seeks to make new homes more energy efficient and to future-proof them for low carbon heating systems. It also covers the wider impacts of Part L for new homes, including changes to Part F (ventilation), its associated Approved Document guidance, airtightness and improving as-built

performance of the constructed home. It is the Council's view that the requirements set out in the Future Homes Standard should be enforced as soon as possible to ensure that homes built in the early 2020s are high quality and ready for a net zero carbon economy. Requirements on insulation, air tightness and primary energy reduction should be strengthened.

- 4 The council have prepared a response to the consultation which is appended to this report. This has been agreed with Councillor John Clare, Climate Change Champion.

Recommendations

- 5 The Interim Corporate Director of Regeneration and Local Services in consultation with the Portfolio Holder for Economic Regeneration is recommended to:
 - a) Agree the attached response to the Future Homes Standard consultation.

Background

- 6 The UK has set in law a target to bring all its greenhouse gas emissions to net zero by 2050 – one of the most ambitious targets in the world. Homes – both new and existing – account for 20% of emissions. Despite progress reducing emissions from homes, we need to go much further.
- 7 The Future Homes Standard will help towards the journey to 2050. The consultation sets out what the government expect a home built to the Future Homes Standard to be like. They will have 75- 80% less carbon emissions than one built to current energy efficiency requirements (Approved Document L 2013). This will likely be achieved through very high fabric standards and a low carbon heating system. This means a new home built to the Future Homes Standard might have a heat pump, triple glazing and standards for walls, floors and roofs that significantly limit any heat loss.
- 8 It is proposed to introduce in 2020 an uplift to existing energy efficiency standards as a stepping stone to the Future Homes Standard. The intention is to make new homes more energy efficient and to future-proof them in readiness for low carbon heating systems.
- 9 The consultation includes proposals for revising the Approved Documents for Part L (Conservation of Fuel and Power) and F (Ventilation) to make them easier to navigate and to support efforts to simplify Approved Documents more generally. This includes incorporation of the technical requirements of the Compliance Guides

for Parts L and F into the Approved Documents and restructuring the suite of guidance for the energy efficiency of dwellings into a single document (Approved Document L volume 1: dwellings).

Scope of the consultation

- 10 The consultation sets out a range of questions under the following chapters:

Chapter 2 The Future Homes Standard

- 11 This discusses the technologies that could facilitate the Future Homes Standard (i.e. heat pumps, heat networks, direct electric heating, etc). Before the Future Homes Standard is introduced in 2025, the government will consult on the full technical details and the associated impact assessment with costings.
- 12 This section also looks at specification - it is anticipated that an average semi-detached home built to meet the Standard would produce 75- 80% less carbon dioxide emissions than one built to the 2013 Part L requirements.
- 13 This section discusses certainty and consistency in setting energy efficiency standards. It considers restricting local planning authorities from setting higher energy efficiency standards for dwellings by amending the Planning and Energy Act 2008 to restrict local planning authorities from setting higher energy efficiency standards for dwellings. This would mean the carbon emission reduction required for new dwellings in the County Durham Plan would be superseded and replaced by a consistent national standard.

Chapter 3 Part L Standards for New Homes in 2020

- 14 Changes are needed to Part L to match the step up needed for energy efficiency standards. There are two options to uplift energy efficiency standards and requirements:
- Option 1: 20% reduction in carbon emissions compared to the current standard for an average home. It is anticipated that this could be delivered by very high fabric standards (typically with triple glazing and minimal heat loss from walls, ceilings and roofs).
 - Option 2: 31% reduction in carbon emissions compared to the current standard. It is anticipated that this could be delivered based on the installation of carbon-saving technology such as photovoltaic (solar) panels and better fabric standards, though not as high as in option 1 (typically double not triple glazing).

- 15 Option 2 is the governments preferred option. It would deliver more carbon savings and result in lower bills for the householder but has higher build costs. It would also help to prepare supply chains for heat pumps and increase the number of trained installers.
- 16 The paper proposes to change the current performance metrics to include an energy target. This will ensure a broader measure of performance which does not solely focus on carbon.
- 17 This section also discusses enhances minimum standards for fabric performance, including in relation for example external and party walls, floors and roofs, windows and doors. Also enhanced requirements for boilers, heat pumps, lighting and cooling applications.
- 18 The government are also proposing to remove fuel factors to help phase out high-carbon fossil fuels on new buildings.
- 19 The section contains a range of detailed additional matters in relation to the redrafting of Part L, for example providing guidance on information about building automation and control systems for new dwellings, and restructuring existing documentation to ensure legibility and accuracy.

Chapter 4 Part F Changes

- 20 This section proposes further changes to Part F to set revised minimum ventilation standards to improve the performance and application of Part F in practice.
- 21 It includes several technical questions in relation to determining rates of ventilation, ingress of external pollutants, noise from mechanical ventilation systems, and, removing/amending guidance in relation to ventilation systems.

Chapter 5 Airtightness

- 22 This section consults on improving the way airtightness is considered in the Building Regulations. To reduce the negative impact of poor indoor air quality associated with making buildings increasingly airtight, it is intended to review the way in which the guidance and SAP encourage airtightness through carbon emission incentives.
- 23 Proposals include expanding the testing of airtightness – i.e. testing all new dwellings in a development rather than a sample, and, including small developments in the testing. Also looks at introducing an alternative to the blower test and adopting an independent approved methodology.

Chapter 6 Compliance, Performance and Providing Information

- 24 This section looks at ways to tackle the “performance gap” (the difference between the design intent and measured energy performance of new build homes). In new built homes this is particularly affected by three major factors: limitations of energy models; different occupant behaviour of each dwelling; and build quality.
- 25 Changes are proposed to improve performance and compliance for Part L-specific issues only – aiming to enhance the evidence used when producing as-built energy calculations.
- 26 Proposals include introducing guidance for ensuring build quality (for example in relation to airtightness and internal services, incoming service penetrations etc) and in terms of evidence required to satisfy the regulations (for example whether inspections or photographic evidence will be appropriate).

Chapter 7 Transitional Arrangements

- 27 This section proposes transitional arrangements for energy efficiency changes.

Chapter 8 Feedback on the Impact Assessment

- 28 An Impact Assessment has been prepared to assess the likely costs, build, phase-in and learning rates for the proposals set out in the consultation. This section asks if these assumptions are fair and reasonable.

Durham Context

County Durham Plan

- 29 The draft County Durham Plan aims to ensure new development contributes to reducing the causes of climate change and supports the transition to a low carbon economy by encouraging and enabling the use of low and zero carbon technologies, supporting the development of appropriate renewable energy sources and sustainable and active transport.

Policy 30 – Sustainable Design

- 30 This policy is supportive of zero carbon buildings and providing renewable and low carbon energy generation, and, including connections to an existing or approved district energy scheme where viable opportunities exist.
- 31 Includes a specific requirement for 10% carbon emissions reductions (based on current building regulations) for new major residential schemes.

Climate Emergency

- 32 The Council declared a climate emergency on 20th February 2019 in recognition that unless emergency action is taken, global warming will continue on its current trajectory toward 3°C with disastrous consequences. The Climate Emergency Reduction Plan to be agreed at Cabinet on 12th February, will include a range of actions that will seek to deliver significant reduction targets. New building makes the target more difficult to meet.

Building Regulations

- 33 DCC Building Regulations team advise that their representative body - Local Authority Building Control (LABC) – will be responding to the consultation on their behalf. However, it is advised that the authority submit a more ‘targeted’ representation on some of the strategic elements of the consultation which have direct implications for council policy and project work.

Next steps

- 34 Following approval, the attached response (appendix 2) will be submitted. Further consultation is expected in the coming months addressing existing domestic buildings, and new and existing non-domestic buildings.

Conclusion

- 35 This report has considered the potential implications and scope of the proposed Future Homes Standard. The Council offers general support for the Standard as this would be an excellent step towards reducing emissions linked to domestic buildings. However, there are areas where further improvements could be made and these are highlighted in the Council’s response.

Background papers

- None

Contact:	Stephen Mcdonald	Tel: 03000 265537
	Stuart Carter	Tel: 03000 261909
	Tom Bray	Tel: 03000 265540

Appendix 1: Implications

Legal Implications

None.

Consultation

None.

Equality and Diversity / Public Sector Equality Duty

Equality and diversity have been considered but this proposal is not expected to impact either positively or negatively on any particular group.

Human Rights

None.

Crime and Disorder

None.

Staffing

Administration of the scheme will be done within existing staffing levels.

Accommodation

None.

Risk

None.

Procurement

None.

Climate Change

Potential benefits, these will depend upon the approach adopted by government in terms of the extent/detail of the uplift in standards and the timeframe for bringing in the changes.

Appendix 2: The Council's Response to the Future Homes Standard Consultation

Document Attached

Q1 Do you agree with our expectation that a home built to the Future Homes Standard should produce 75-80% less CO2 emissions than one built to current requirements?

a. Yes b. No – 75-80% is too high a reduction in CO2 c. No – 75-80% is too low a reduction in CO2

If no, please explain your reasoning and provide evidence to support this.

Durham County Council agrees with the expectation, but the reduction is based on accounting linked to carbon intensity of the grid rather than an improvement in building quality and demonstrates how out of date current legislation is rather than the ambition of this standard. Highlighting this reduction should come with the clear caveat rather than spin to meet requirements linked climate emergency.

Q2 We think heat pumps and heat networks should typically be used to deliver the low carbon heating requirement of the Future Homes Standard. What are your views on this and in what circumstances should other low carbon technologies, such as direct electric heating, be used?

Agree. Direct electric heating not the preference where heat pump systems can be used. Direct electric is a preference to gas in new, low energy buildings

Q3 Do you agree that the fabric package for Option 1 (Future Homes Fabric) set out in Chapter 3 and Table 4 of the impact assessment provides a reasonable basis for the fabric performance of the Future Homes Standard?

a. Yes b. No – the fabric standard is too demanding **c. No – the fabric standard is not demanding enough**

If no, please explain your reasoning.

The focus should be on fabric, being ambitious on this should be our priority to reduce emissions.

Q4 When, if at all, should the government commence the amendment to the Planning and Energy Act 2008 to restrict local planning authorities from setting higher energy efficiency standard for dwellings?

a. In 2020 alongside the introduction of any option to uplift the energy efficiency standards of Part L b. In 2020 but only in the event of the introduction of a 31% uplift (option 2) to the energy efficiency standards of Part L c. In 2025 alongside the introduction of the Future Homes Standard **d. The government should not commence the amendment to the Planning and Energy Act**

Please explain your reasoning.

Local authorities should have the ability to set different targets where, for example, a climate emergency has been declared. Restricting response

Q5 Do you agree with the proposed timings presented in Figure 2.1 (displayed in Chapter 2) showing the Roadmap to the Future Homes Standard?

a. Yes b. No – the timings are too ambitious c. **No – the timings are not ambitious enough**

If no, please explain your reasoning.

Legislation on new building energy efficiency improvements and carbon reduction should be enacted as soon as possible.

Chapter 3 Part L Standards for New Homes in 2020

Q6 What level of uplift to the energy efficiency standards in the Building Regulations should be introduced in 2020?

a. No change b. Option 1 – 20% CO2 reduction c. Option 2 – 31% CO2 reduction (the government's preferred option) **d. Other**

Please explain your reasoning.

The focus should be on fabric energy efficiency first, the unit of energy we don't spend is the lowest carbon. Then, after we have ensured homes are of the highest quality, we should begin to investigate adding solar photovoltaics to homes. Option 2 risks greenwashing poor quality buildings, option 1 does not go far enough.

Q7 Do you agree with using primary energy as the principal performance metric?

a. Yes – primary energy should be the principal performance metric b. No – CO2 should remain the principal performance metric c. No – another measure should be the principal performance metric

Please explain your reasoning and provide evidence to support this.

Minimising primary energy should be priority so setting a limit for new building should be the preference.

Q8 Do you agree with using CO2 as the secondary performance metric?

a. Yes b. No

Please explain your reasoning.

A Carbon Metric could be a distraction i.e. poorly performing buildings covered in photovoltaics could have low carbon emissions but high primary energy.

Q9 Do you agree with the proposal to set a minimum target to ensure that homes are affordable to run?

a. Yes b. No

Please explain your reasoning.

Yes, this would mean they are efficient buildings that do not require large amounts of energy. This should be a priority in meeting climate targets and would ensure affordability for fuel poor households.

Q10 Should the minimum target used to ensure that homes are affordable to run be a minimum Energy Efficiency Rating?

a. Yes b. No

If yes, please suggest a minimum Energy Efficiency Rating that should be achieved and provide evidence to support this.

If not, please suggest an alternative metric, explain your reasoning and provide evidence to support this.

Energy efficiency rating should be a science based target (for example EUI in kWh/m2/yr), a generic rating risks interpretation and misunderstanding.

Q11 Do you agree with the minimum fabric standards proposed in table 3.1?

Table 3.1 - Minimum standards for fabric performance

Yes **No – should be more insulating** No – should be less insulating

If you do not agree with any one or more of the proposed standards, please explain your reasoning and provide evidence to support this.

Quality of building fabric and level of air permeability are key to reducing heat demand in buildings. Minimising heat loss by minimising these values should be prioritised. Buildings at the proposed U-values will risk requirement of retrofit before 2050.

Q12 Do you think that the minimum fabric standards should be set in the Building Regulations or in the Approved Document (as is the current case)?

a. In the Building Regulations b. In the Approved Document

Please explain your reasoning.

No preference

Q13 In the context of the proposed move to a primary energy metric and improved minimum fabric standards, do you agree with the proposal to remove the fabric energy efficiency target?

a. Yes **b. No**

If no, please explain your reasoning.

It is unclear what removing the target would achieve. Any improvement in standards should have a clear target and requirement to ensure industry achieves fabric standards as a minimum.

Q14 Do you agree that the limiting U-value for roof-lights should be based on a roof-light in a horizontal position?

c. Yes d. No

If no, please explain your reasoning and provide evidence to support this.

Q15 Do you agree that we should adopt the latest version of BR 443?

c. Yes d. No

If no, please explain your reasoning and provide evidence to support this.

Q16 Do you agree with the proposal of removing the fuel factors to aid the transition from high-carbon fossil fuels?

a. Yes b. No

If no, please explain your reasoning

Use accurate fuel factors based on emissions in use. As grid electricity and natural gas supply decarbonise industry should be agile to update and change supply based on carbon preference.

Q17 Do you agree with the proposed changes to minimum building services efficiencies and controls set out in table 3.2?

Yes No – proposed standard goes too far No – proposed standard does not go far enough

Table 3.2: Proposed revisions to minimum building services efficiencies and controls for new dwellings

Application Proposed Part L 2020 standard

Gas boiler efficiency 92% ErP

Heat pump efficiency SCOP 2.80

Comfort cooling efficiency SEER 3.87

Lighting 60 lamp lumens per circuit-watt

If you do not agree with any one or more of the proposed changes, please explain your reasoning and provide evidence to support this.

No comment

Q18 Do you agree with the proposal that heating systems in new dwellings should be designed to operate with a flow temperature of 55°C?

a. Yes **b. No – the temperature should be below 55°C** c. No – dwellings should not be designed to operate with a low flow temperature d. No – I disagree for another reason

If no, please explain your reasoning and provide evidence.

Temperature should be suitable for high efficiency heat pumps immediately or for retrofit

Q19 How should we encourage new dwellings to be designed to operate with a flow temperature of 55°C?

a. By setting a minimum standard b. Through the target primary energy and target emission rate (i.e. through the notional building) c. Other

Please explain your reasoning.

Q20 Do you agree with the proposals to simplify the requirements in the Building Regulations for the consideration of high-efficiency alternative systems?

a. Yes b. No

If no, please explain your reasoning.

Q21 Do you agree with the proposal to adopt the latest Standard Assessment Procedure, SAP 10?

a. Yes b. No

If no, please explain your reasoning.

Q22 Do you agree with the proposal to update the source of fuel prices to BEIS Domestic energy price indices for SAP 10.2?

a. Yes b. No

If no, please explain your reasoning.

Q23 Do you agree with the method in Briefing Note – Derivation and use of Primary Energy factors in SAP for calculating primary energy and CO2 emissions factors?

a. Yes b. No

If no, please explain your reasoning.

Q24 Do you agree with the removal of government Approved Construction Details from Approved Document L?

a. Yes b. No

If no, please explain your reasoning.

Minimum standards for thermal bridging need to be met.

Q25 Do you agree with the proposal to introduce the technology factors for heat networks, as presented in the draft Approved Document?

a. Yes b. No, they give too much of an advantage to heat networks c. No, they do not give enough of advantage to heat networks d. No, I disagree for another reason

Please explain your reasoning.

It is good to encourage heat networks particularly where low carbon heat sources are available.

Q26 Do you agree with the removal of the supplementary guidance from Approved Document L, as outlined in paragraph 3.59 of the consultation document?

a. Yes **b. No**

If no, please explain your reasoning.

Without guidance on these issues there is a risk that poor choices will be made in the design of new homes.

Q27 Do you agree with the external references used in the draft Approved Document L, Appendix C and Appendix D?

a. Yes b. No

If no, please explain your reasoning and suggest any alternative sources.

No comment

Q28 Do you agree with incorporating the Compliance Guides into the Approved Documents?

a. Yes b. No

If no, please explain your reasoning.

No comment

Q29 Do you agree that we have adequately covered matters which are currently in the Domestic Building Services Compliance Guide in the new draft Approved Document L for new dwellings?

a. Yes b. No

If no, please explain which matters are not adequately covered.

No comment

Q30 Do you agree that we have adequately covered matters which are currently in the Domestic Ventilation Compliance Guide in the new draft Approved Document F for new dwellings?

a. Yes b. No

If no, please explain which matters are not adequately covered.

No comment

Q31 Do you agree with the proposals for restructuring the Approved Document guidance?

a. Yes **b. No**

If no, please explain your reasoning.

The current Approved Documents are split into four clearly defined documents based on building typology and age. It seems curious that the four documents should be pulled together into one, given that only one of the three is being consulted on currently. Restructuring the documents as proposed seems unnecessary and could lead to confusion over scope.

Q32 Do you agree with our proposed approach to mandating self-regulating devices in new dwellings?

a. Yes

b. No

If no, please explain your reasoning.

No comment

Q33 Are there circumstances in which installing self-regulating devices in new dwellings would not be technically or economically feasible?

a. Yes b. No

If yes, please explain your reasoning and provide evidence.

No comment

Q34 Do you agree with proposed guidance on providing information about building automation and control systems for new dwellings?

a. Yes b. No

If no, please explain your reasoning.

Chapter 4 Part F Changes

Q35 Do you agree that the guidance in Appendix B to draft Approved Document F provides an appropriate basis for setting minimum ventilation standards?

a. Yes b. No

If no, please explain your reasoning.

No comment

Q36 Do you agree that using individual volatile organic compounds, informed by Public Health England guidelines, is an appropriate alternative to using a total volatile organic compound limit?

a. Yes b. No – the Public Health England guidelines are not sufficient

c. No – individual volatile organic compounds should not be used to determine ventilation rates d. No – I disagree for another reason

If no, please explain your reasoning, and provide alternative evidence sources if appropriate.

No comment

Q37 Do you agree with the proposed guidance on minimising the ingress of external pollutants in the draft Approved Document F?

a. Yes b. No

If no, please explain your reasoning.

No comment

Q38 Do you agree with the proposed guidance on noise in the draft Approved Document F?

a. Yes b. No – this should not form part of the statutory guidance for ventilation, or the guidance goes too far c. No – the guidance does not sufficiently address the problem d. No – I disagree for another reason

If no, please explain your reasoning.

No comment

Q39 Do you agree with the proposal to remove guidance for passive stack ventilation systems from the Approved Document?

a. Yes b. No

If no, please explain your reasoning.

No comment

Q40 Do you agree with the proposal to remove guidance for more airtight naturally ventilated homes?

a. Yes **b. No**

If no, please explain your reasoning.

It is unclear what the boundary is between more airtight and less airtight homes. We suggest homes should have a maximum air permeability of $3\text{m}^3/\text{m}^2\cdot\text{h}$ at 50Pa. Any guidance for naturally ventilated homes operating at a higher air permeability should be removed. With an air permeability of

<<3m³/m².h at 50Pa mechanical ventilation with heat recovery should be required, hence all guidance on naturally ventilated homes should be removed.

Q41 Do you agree with the proposal to remove guidance for less airtight homes with mechanical extract ventilation?

a. Yes b. No

If no, please explain your reasoning.

Q42 Do you agree with the proposed guidance for background ventilators in naturally ventilated dwellings in the draft Approved Document F?

a. Yes b. No – the ventilator areas are too large c. No – the ventilator areas are too small **d. No - I disagree for another reason**

If no, please explain your reasoning.

All guidance for natural ventilation should be removed. An air permeability of <<3m³/m².h at 50Pa should be used for mechanical ventilation with heat recovery.

Q43 Do you agree with the proposed approach in the draft Approved Document for determining minimum whole building ventilation rates in the draft Approved Document F?

a. Yes b. No – the ventilation rate is too high c. No – the ventilation rate is too low d. No - I disagree for another reason

If no, please explain your reasoning.

No comment

Q44 Do you agree that background ventilators should be installed for a continuous mechanical extract system, at 5000mm² per habitable room?

a. Yes b. No – the minimum background ventilator area is too low c. No – the minimum background ventilator area is too high d. No – other

If no, please explain your reasoning.

No comment

Q45 Do you agree with the external references used in the draft Approved Document F, in Appendices B, D and E?

a. Yes b. No

If no, please explain your reasoning and suggest any alternative sources.

No comment

Q46 Do you agree with the proposed commissioning sheet proforma given in Appendix C of the draft Approved Document F, volume 1?

a. Yes b. No

If no, please explain your reasoning.

No comment

Q47 Do you agree with the proposal to provide a completed checklist and commissioning sheet to the building owner?

a. Yes b. No

If no, please explain your reasoning.

No comment

Chapter 5 Airtightness

Q48 Do you agree that there should be a limit to the credit given in SAP for energy savings from airtightness for naturally ventilated dwellings?

a. Yes **b. No**

If no, please explain your reasoning.

Air tightness in naturally ventilated buildings risks not providing sufficient ventilation for fresh air during cold months. Buildings should be air tight with mechanical ventilation and heat recovery.

Q49 Do you agree that the limit should be set at 3m³/m².h?

a. Yes b. No – it is too low c. No – it is too high

If no, please explain your reasoning and provide evidence.

Q50 Is having a standard level of uncertainty of 0.5 m³/m².h appropriate for all dwellings undergoing an airtightness test?

a. Yes b. **No – a percentage uncertainty would be more appropriate** c. No – I agree with having a standard level of uncertainty, but 0.5 m³/m².h is not an appropriate figure. d. No – I disagree for another reason

If no, please explain your reasoning.

For lower air tightness buildings 0.5 m³/m².h is a large % error.

Q51 Currently only a proportion of new dwellings are required to be airtightness tested. Do you agree with the proposal that all new dwellings should be airtightness tested?

a. Yes b. No

If no, please explain your reasoning and provide evidence to support this.

Q52 Currently, small developments are excluded from the requirement to undergo any airtightness tests. Do you agree with including small developments in this requirement?

a. Yes b. No

If no, please explain your reasoning and provide evidence to support this.

Q53 Do you agree that the Pulse test should be introduced into statutory guidance as an alternative airtightness testing method alongside the blower door test?

a. Yes b. No

If no, please explain your reasoning.

No comment

Q54 Do you think that the proposed design airtightness range of between 1.5 m³/m².h and the maximum allowable airtightness value in Approved Document L Volume 1 is appropriate for the introduction of the Pulse test?

a. Yes b. No

If no, please explain your reasoning and provide evidence to support this

No comment

Q55 Do you agree that we should adopt an independent approved airtightness testing methodology?

a. Yes b. No

Please explain your reasoning.

There should be an independent approved airtightness testing methodology for consistency

Q56 Do you agree with the content of the CIBSE draft methodology which will be available via the link in the consultation document? Please make any comments here.

No comment

Chapter 6 Compliance, Performance and Providing Information

Q57 Do you agree with the introduction of guidance for Build Quality in the Approved Document becoming part of the reasonable provision for compliance with the minimum standards of Part L?

a. Yes b. No

Please explain your reasoning and provide evidence to support this.

Q58 Do you have any comments on the Build Quality guidance in Annex C?

No

Q59 Do you agree with the introduction of the standardised compliance report, the Building Regulations England Part L (BREL) report, as presented in Annex D?

a. Yes b. No there is no need for a standardised compliance report c. No – I agree there should be a standardised compliance report but do not agree with the draft in Annex D

If no, please explain your reasoning

Q60 Do you agree with the introduction of photographic evidence as a requirement for producing the as-built energy assessment for new dwellings?

a. Yes b. No

If no, please explain your reasoning

Q61 Do you agree with the proposal to require the signed standardised compliance report (BREL) and the supporting photographic evidence to be provided to Building Control?

a. Yes b. No

If no, please explain your reasoning

Q62 Do you agree with the proposal to provide homeowner with the signed standardised compliance report (BREL) and photographic evidence?

a. Yes b. No

Please explain your reasoning.

Q63 Do you agree with the proposal to specify the version of Part L that the home is built to on the EPC?

a. Yes b. No

Please explain your reasoning.

More information that a homeowner has is valuable for maintaining a building and understanding energy efficiency

Q64 Do you agree Approved Document L should provide a set format for a home user guide in order to inform homeowners how to efficiently operate their dwelling?

a. Yes b. No

If yes, please provide your views on what should be included in the guide.

O&M manuals for heating plant, advice on when and how to heat etc. Advice on how to save water.

If no, please explain your reasoning

Chapter 7 Transitional Arrangements

Q65 Do you agree that the transitional arrangements for the energy efficiency changes in 2020 should not apply to individual buildings where work has not started within a reasonable period – resulting in those buildings having to be built to the new energy efficiency standard?

a. Yes – where building work has commenced on an individual building within a reasonable period, the transitional arrangements should apply to that building, but not to the buildings on which building work has not commenced b. No – the transitional arrangements should continue to apply to all building work on a development, irrespective of whether or not building work has commenced on individual buildings

If yes, please suggest a suitable length of time for the reasonable period in which building work should have started

If no, please explain your reasoning and provide evidence to support this.

Q66 Do you foresee any issues that may arise from the proposed 2020 transitional arrangements outlined in this consultation?

a. Yes b. No

Please explain your reasoning and provide evidence to support this.

Q67 What is your view on the possible transitional arrangements regarding changes to be made in 2025?

No comment

Chapter 8 Feedback on the Impact Assessment

Q68 The Impact Assessment makes a number of assumptions on fabric/services/ renewables costs, new build rates, phase-in rates, learning rates, etc for new homes. Do you think these assumptions are fair and reasonable?

a. Yes b. No

Please explain your reasoning and provide evidence to support this.

No comment

Q69 Overall, do you think the impact assessment is a fair and reasonable assessment of the potential costs and benefits of the proposed options for new homes?

a. Yes b. No

If no, please explain your reasoning and provide evidence to support this.

No comment