LETI - Building Regulations Part L and F Consultation

Chapter 2 The Future Homes Standard

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.

Part L needs to lead the way on the transitioning to a zero carbon construction industry. To ensure that the buildings built in 2030 are truly net zero carbon, we need to start designing building that can operate at this standard before 2025.

The current focus on CO_2 is treating the symptoms, not the underlying causes. A significant proportion of the proposed saving come not through improvements in the buildings themselves, but the decarbonisation of the grid. The building regulations should be pressing for improved building performance regardless of the grid decarbonisation, which the proposed standards do not.

Instead the focus should be on improving energy performance, which will have a consequential improvement on CO_2 emissions. Using Energy Use Intensity (EUI) in $kWh/m^2/yr$ as a metric will shift the focus to reducing activities that could, and do, produce CO_2.

Through focusing on the energy use of the buildings rather than carbon, it will reduce the burden on the already over-stretched national grid, helping to decarbonise the grid more rapidly.

The 70-80% reduction is also only the regulated aspect of the energy usage, and does not include the unregulated aspect, which can easily double the overall energy usage. If this unregulated component is not included, then the predicted reductions will not be achieved in practice, undermining the purpose of Part L.

Additionally, a key aspect of the Part L impact is the affordability of energy. This is linked to the demand, not the CO2 emissions and should be reflected in the target.

It is key to note that although examining reductions in emissions is useful for measuring progress, it should be noted that the ultimate goal is zero carbon. Using simple percentage reductions will only ever get us close to zero, but not all the way. Zero carbon should be the ultimate goal of Part L.

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?

Heat pumps provide the most cost effective route to low-carbon heat and should be encouraged, particularly over direct electric, which is very expensive to run and considerably less efficient than even a poor performing heat pump.

Heat networks will have an important part to play in the future of heating, but their true carbon intensity per kWh delivered needs to be independently calculated, including the losses through transmission. Heat networks that support combustion should not be encouraged, as all combustion produces CO_2, but also because they will have an impact on air quality.

It should be clear that electricity is not a low carbon option currently, but is predicted to be in the near future. Focus should be on reducing energy consumption in the first instance, then then choosing the low carbon impact option. Taking this approach, direct electric heating becomes less viable until the heat demand is reduced through improved fabric.

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 proposed fabric standards are not demanding enough. New buildings should be aiming to reduce energy consumption as near to zero as practical. In particular, this should be through improving the building insulation, reducing air permeability, and improving the form factor.

The Future Homes standard should not be delayed until 2025, but incorporated as soon as possible, with higher standards than those proposed, to ensure that the industry is able to design and build zero carbon buildings by 2025.

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.

Over 250 councils have declared a climate emergency, and the amendment to the Planning and Energy Act will remove their powers to respond to their specific needs. The government, which has also declared a climate emergency, should be supporting councils in their progress to become net zero carbon.

Through restricting the powers of the local planning authorities, it would send the message that the Part L standards are enough to reach their zero carbon goals, which is it not. By enabling local authorities to increase their targets, it could increase the industry's knowledge and capability of zero carbon buildings far quicker than it would otherwise.

The current London Plan requires a 35% reduction in CO_2 emissions, with 10% arising from fabric alone. This has not harmed development in London, and the new Part L requirements would be a step backwards.

It should not be the position of the government to impede those who wish to improve their local environment.

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.

To meet the 2030 zero carbon targets, we must be building and zero carbon buildings by 2025. In order make this deadline, the proposed standards must be phased in much sooner. This must be complemented with transparency of performance in-use, similar to the DEC methodology, to ensure that we are delivering the low energy buildings we need.

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.

Neither of these options are ambitious enough on fabric efficiency, instead using the improved carbon factors to appear to be efficient buildings. Key to ensuring a sustainable future is reducing the energy demand in the first instance, in parallel with the low-carbon technology becoming available.

Research through LETI has shown that buildings that would have failed under the 2013 Part L FEES standards would pass comfortably under the proposed changes, almost solely due to the inclusion of a heat pump.

It should be noted that the best improvement of the two options, 31%, is still lower than required in London, which has been successfully implemented. It is not clear why this is not thought of as achievable in the new version of Part L.

Instead of a carbon reduction target, it should be an absolute energy target, similar to Passivhaus.

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.

The metrics proposed are not directly visible by the end users, and subject to change year on year. One of the key failings of the current Part L is the inability for SAP to reflect live carbon factors.

Instead of primary energy or CO_2, the main metric should energy use intensity (EUI) in kWh/m2/yr, including both regulated and unregulated energy. Through reducing energy use, the industry will be consequently reducing the CO_2. We need to fix the source of energy use in the first instance, then choose less carbon intensive energy sources. This decouples the risk from the grid decarbonisation, which is subject to fluctuations that may not affect the construction industry.

Through measuring energy, it will also empower building owners to understand their energy use, giving them an accurate design benchmark they can use to measure themselves against. Current SAP "predictions" only confuse the issue of energy performance by providing unattainable figures.

Q8

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

~~a. Yes~~

b. No

Please explain your reasoning.

Minimising energy usage should be the first priority, and should be measured as Energy Use Intensity (EUI) kWh/m2/yr. Using CO2 as a secondary metric may confuse the clarity of the building regulations.

As energy sources become lower carbon, using CO2 will conceal improvements in reduction of energy usage, potentially concealing poor building performance.

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.

Working towards eliminating fuel poverty should be a key aspect of the new Part L methodology. However, affordability, like CO_2, is a secondary metric, derived from the underlying energy usage. It is open to fluctuations on market conditions that are beyond the influence of the building designers and contractors.

Instead, absolute performance figures should be provided, which the current version of SAP does not provide. Full energy prediction, including unregulated performance, should be mandated to ensure true affordability of our future buildings.

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 ratings have been shown by studies, including by Etude, to be a poor predictor of energy performance. Instead, they should use actual energy prediction of the building, including regulated and unregulated energy, to illustrate energy performance. This will enable householders to be confident in their predicted energy bills, something which the current EPCs do not enable. This could be complemented with bands as the with the current EPC, but it should not be the lead target.

Q11

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

~~a. Yes~~
b. No – should be more insulating
~~c. No – should be less insulating~~

Table 3.1 – Minimum standards for fabric performance

External walls	**0.26 W/m2.K**
Party walls	**0.20 W/m2.K**
Floor	**0.18 W/m2.K**
Roof	**0.16 W/m2.K**
Windows, roof windows, glazed roof lights, curtain walling, and pedestrian doors	**1.6 W/m2.K**
Roof-lights	**2.2 W/m2.K**
Air permeability	**8m3/m2.K at 50Pa**

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

It is felt that these standards do not go far enough, as the fabric should be leading the reduction in carbon emissions by reducing energy usage in the first instance. The proposed methodology would allow poorer performing buildings to be built than under the previous Part L regulations.

Based on our experience, the following standards are proposed:

External walls	0.15 W/m2.K
Party walls	0.0 W/m2.K
Floor	0.10 W/m2.K
Roof	0.10 W/m2.K
Windows, roof windows, glazed roof lights, curtain walling, and pedestrian doors	1.2- 0.8 W/m2.K
Air permeability	<<3m3/m2.h at 50Pa

To protect consumers in new dwellings from inadvertently suffering dangerously poor indoor air quality, MVHR should be used, unless air quality can be guaranteed through another method.

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.

Most people will use the approved document rather than regulations themselves. Tying the standards into the regulations rather than approved document also makes them harder to modify.

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.

The use of derived values of building performance rather than the underlying energy performance can be used to conceal poor performing buildings. High fabric efficiency targets should be the first step in improving the performance of our buildings.

The proposed standards are not high enough to justify the removal of FEES.

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.

Q17

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

~~a. Yes~~
~~b. No – proposed standard goes too far~~
c. 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.

The SEER could be increased to 4.0, and the lamp efficiencies of 80 lumens/watt are readily available.

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.

Greater efficiencies are available to heat pumps through operating at 45°C flow temperature. It is suggested that this is a more appropriate flow temperature to use.

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.

Setting a minimum standard will ensure that there is commonality between buildings, simplifying retrofit and maintenance in future.

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.

The SAP methodology has not been improved enough to overcome the fundamental flaws within it. These flaws are a key factor in the issue of performance prediction compared to performance in use. These flaws include:

- New building should be aiming to achieve zero carbon emissions, not improve over a notional building.
- The notional building is modelled with the same orientation and form factor as the actual building, both of which may be very poor.
- The notional building is using a boiler, which is considerably less carbon efficient than a heat pump reducing the need to improve the actual building energy consumption.
- SAP is not considering overheating criteria, which will become an increasing issue as climate change occurs.

SAP should be complemented with dynamic simulation, which will enable a more accurate analysis of the building performance, as well as enabling the use of more innovative systems/approaches, particularly in more complicated buildings.

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.

The update to the pricing is a welcome addition, but consideration needs to be given to the live variation of the prices, particularly given seasonal and annual fluctuations.

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.

While the methodology includes the analysis method, it does not include the underlying numbers and their associated methods used to derive the primary energy factor. Full transparency is required for these factors to be of use. It is unclear how these factors will reflect the improving grid, with clarity of updates and update frequency needs to be addressed.

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.

Encouraging accurate thermal bridging calculations rather than using defaults is a key step in upskilling the industry to build truly low carbon homes. However, in this transition period it is important to provide detailed guidance, ensuring that those without the prerequisite knowledge are not left behind.

The production of efficient standard details, such as those started by the zero carbon hub, would be a key resource not just for developers, designers, and builders, but also building control who will have a detail to use for comparison.

With the removal of FEES, thermal bridging will have a reduced impact on the Part L performance, as the focus is on carbon emissions rather than energy usage, using carbon

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.

Heat networks should be treated the same as other heating technologies, with the technology factor giving undue favour to one particular system. Through introducing this factor, they are noting that they are not the most carbon efficient system. Instead, a transparent, and independent, assessment of the carbon intensity of the network should be undertaken.

Heat networks do have the ability to efficient, low carbon sources of heat, however they need to be treated with the same transparency as other systems.

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.

The guidance forms a useful baseline of knowledge and should be included, particularly as we transition to a zero carbon economy.

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.

Q28

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

~~a. Yes~~

b. No

If no, please explain your reasoning.

The guidance that the compliance guides contain will need to be retained, and the merging process will put these at risk.

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.

The guidance that the compliance guides contain will need to be retained, and the merging process will put these at risk.

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.

The guidance that the compliance guides contain will need to be retained, and the merging process will put these at risk.

Q31

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

~~a. Yes~~

b. No

If no, please explain your reasoning.

Each of these Approved Documents recognises that buildings need different approaches, based on sector and age. Not enough information on the restructuring has been proposed, particularly as very little information on the performance standards for existing and non-domestic buildings has been provided.

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.

Self-regulating devices are an important step in reducing energy demand, however, it is important the whole system is considered to ensure efficient operation.

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.

Report by the Energy Saving Trust (Report No. 6507) indicated that TRVs could lead to inefficient use of heat pumps. As noted above, the whole system needs to be considered, rather than just one aspect.

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.

Generally agree with the proposed guidance, but with the increase in IoT and intelligent controllers (e.g. Nest) it is important that these are acknowledged in the guidance.

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.

Less airtight buildings should be subject to the same requirements as other buildings. The airtightness may not be uniform across the whole building, with the "benefit" of low air tightness not necessarily in the occupied rooms.

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.

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.

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.

Noise thresholds should be prescribed, particularly given that noise from mechanical ventilation has been a common reason for the units to be turned off. Ducts, routing, velocities, and dampers are all potential sources of noise, which can be addressed most simply through using noise levels within the room.

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.

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 recommended that all homes should have a permeability of less than 3 $m^3/m^2/hr$ at 50 Pa, which would necessitate mechanical ventilation. This removes the issue surrounding less airtight homes.

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.

Natural ventilation should be removed, with all buildings instead achieving 3 m3/m2/hr at 50 Pa and thus requiring mechanical ventilation. Natural ventilation methods should be in addition to any mechanical systems provided.

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.**~~

Q44

Do you agree that background ventilators should be installed for a continuous mechanical extract system, at 5000mm^2 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.

The size of the ventilator should be aligned with the ventilation rate determined by the usage of the room.

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.

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.

Insulation of ducts carrying external air is required to reduce the thermal bridging and to avoid condensation issues.

Specific fan power should be measured and noted to demonstrate compliance with the energy prediction (whether SAP or other).

Noise levels created by the system at each ventilation rate are to be recorded to ensure compliance with noise levels (which should be prescribed).

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.

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.

Building should be achieving 3 m^3/m^2/hr at 50 Pa, at which point mechanical ventilation becomes necessary.

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.

Building should be achieving 3 m^3/m^2/hr at 50 Pa, at which point mechanical ventilation becomes necessary.

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.

A percentage of the permeability would be more appropriate, particularly as become much more air tight and 0.5 m3/m2/hr could be a significant proportion of the achieved air tightness.

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.

A key part of Part L should be ensuring comparability between buildings. Differences in air testing method could decrease the comparability of buildings, for little gain.

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

Mixing methods for testing would introduce a lack of comparability between buildings, for little gain.

Q55

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

a. Yes

~~b. No~~

Please explain your reasoning.

The airtightness testing methodology should be independently set, using those that already exist, notably through ATTMA.

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.

Yes.

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

Units should be Energy Use Intensity (EUI) in kWh/m^2/yr, not primary energy rate.

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.

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.

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.

It is felt that two years would enable a phase to be completed on a large development.

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.

There needs to be considerable clarity over when a project actually commences, particularly the delineation of enabling works and building works.

Q67

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

The timeframe for adoption of the new regulations is too slow, as buildings will be required to being built to higher standards than those proposed by 2025, not just designed to those standards.

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.

Option 2 relies on photovoltaics to balance the cost, but is not a reflection on the energy performance of the buildings.

Phase in of the new regulations should be much quicker, which will alter the impacts. This impact of changing the phase in period should be analysed to changing impact as it is anticipated that the faster we transition to a low carbon economy, the greater the wider benefits, notably financial.

Embodied carbon has not be analysed at all, and will have a significant impact on the environmental outcomes of the project.

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.

The externalities of the analysis are very under analysed, notably:

- Improvement on air quality
- Creation of a zero carbon economy
- Impact of climate change mitigation
- Reduction on reliance of technologies imported into UK post-Brexit.