

Consultation Questions

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.

(c). The consultation document does not explain where the figures of 75 - 80% have come from. There appears to be an expectation of what might be achieved by the proposals. Since publication of this consultation, the profile of climate change has risen further up the public agenda. There is seemingly a strong appetite for significant change and that this change needs to take place sooner than 2025 to slow down the rate of carbon emissions from new dwellings. The proposed reduction of 75 - 80% is considered to be too low.

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?

Provided the technology is proven to deliver the low carbon heating requirement, heat pumps should be acceptable to meet reduced heating needs. Other low or zero carbon (LZC) technologies such as PV are also available. The guidance should not be restrictive in this respect. No issues with direct electric heating on basis that it continues to reduce carbon emissions for its production at source.

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?

- 1. Yes
- 2. No—the fabric standard is too demanding

3. No – the fabric standard is not demanding enough
If no, please explain your reasoning.

(3) The option 1 package is not considered to be demanding enough for Future Homes fabric standard. The only evidence available is the dramatic effects of climate change which need to be ameliorated as soon as possible. It is considered there is a need to be pushing for closer to carbon neutral / passivhaus standard.

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?

1. In 2020 alongside the introduction of any option to uplift the energy efficiency standards of Part L
2. In 2020 but only in the event of the introduction of a 31% uplift(option2) to the energy efficiency standards of Part L
3. In 2025 alongside the introduction of the Future Homes Standard
4. The government should not commence the amendment to the Planning and Energy Act

Please explain your reasoning.

(4) Local Authorities should be able to set their own efficiency standards including use of Photovoltaics (PV) on all new and renovated buildings. City of York Council would like to urge the Government to move towards a compulsory requirement for PV to be installed in new buildings and renovated buildings where there are no significantly adverse implications in terms of any heritage assets.

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?

1. Yes
2. No–the timings are too ambitious
3. No – the timings are not ambitious enough

If no, please explain your reasoning.

(3) The timings are not ambitious enough. Again, because of climate emergency, introduction of FHS needs to be sooner rather than later. The Spring Statement suggested that by 2025, FHS will be introduced. This does not mean it cannot be introduced earlier.

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?

1. No change
2. Option 1 – 20% CO₂ reduction
3. Option 2 – 31% CO₂ reduction (the government's preferred option)
4. Other

Please explain your reasoning.

(3).Option 2. It is considered that this is economically and technologically achievable in the short term.

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

1. Yes—primary energy should be the principal performance metric
2. No – CO₂ should remain the principal performance metric
3. No – another measure should be the principal performance metric

Please explain your reasoning and provide evidence to support this.

(1)The primary energy metric is considered acceptable provided the calculation method is sound and it is meaningful and does not hide Co₂ emissions in the primary energy chain.

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

a. Yes b. No

Please explain your reasoning.

(a) Yes. There is still need to reduce carbon emissions.

It is considered that carbon emissions metric is understandable and more readily than the primary energy metric.

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.

(b) No. This should be covered by meeting the energy /Co₂ requirements in the design and providing householders with the necessary information on how to operate systems properly and therefore economically.

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.

(a) Yes. Should be an A rating

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

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

Yes – agreed. With exception of air test. Air test of 6 or better is readily achievable currently.

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.

(a) In Building Regulations. It is considered through the use of Building Regulations that the minimum standards could be met along with successful enforcement.

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.

(a) Yes.

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.

(a) Yes.

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

a. Yes b. No

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

(a) Yes.

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.

(a) Yes

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

Table 3.2: Proposed revisions to minimum building services efficiencies and controls for new dwellings				
Application	Proposed Part L 2020 standard	Yes	No – proposed standard goes too far	No – proposed standard does not go far enough
Gas boiler efficiency	92% ErP	Y		
Heat pump efficiency	SCOP 2.80	Y		
Comfort cooling efficiency	SEER 3.87	Y		
Lighting	60 lamp lumens per circuit-watt	Y		

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

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.

(a) Yes.

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

- 1. By setting a minimum standard
- 2. Through the target primary energy and target emission rate (i.e.through the notional building)
- 3. Other

Please explain your reasoning.

(1) Through setting a minimum standard, it is considered that this should be encouraged and fully accessible.

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.

(a) Yes.

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.

(a) Yes.

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.

(a) Yes.

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.

(a) Yes.

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.

(a) Yes.

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

1. Yes
2. No, they give too much of an advantage to heat networks
3. No, they do not give enough of advantage to heat networks
4. No, I disagree for another reason

Please explain your reasoning.

(1) Yes. Provided the network is an intended part of the design scheme and not a future proposal.

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.

(a) Yes.

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.

(a) Yes.

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

- a. Yes b. No

If no, please explain your reasoning.

(a) Yes.

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.

(a) Yes.

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.

(a) Yes.

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

a. Yes b. No

If no, please explain your reasoning.

(a) Yes. However, it is noted that the Approved Document content is becoming increasingly complicated. The concern is that the complexity of the documents will result in further work for building control staff to provide advice to persons carrying out building work who need to take on the services of professional advisors. LABC in particular are inadequately resourced to take on more advisory work.

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.

(a) Yes.

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.

(b) No.

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.

(a) Yes.

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.

(a) Yes.

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 guide lines 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.

(c) No. Ventilation systems for new buildings are normally designed for an unknown or unquantified internal environment. With only limited evidence available, it is not clear how individual VOC's will be measured and / or assessed for a proposed project.

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.

(a) Yes.

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.

(d) No. it is considered that problems may arise from the guidance. If there is going to be a statement, it needs to be quantifiable and controllable by reference to a standard.

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.

(a) Yes.

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.

(a) Yes.

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.

(a) Yes.

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.

(a) Yes.

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.

(a) Yes.

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

- 1. Yes
- 2. No—the minimum background ventilator area is too low
- 3. No – the minimum background ventilator area is too high
- 4. No—other

If no, please explain your reasoning.

(1) Yes.

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.

(a) Yes.

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.

(a) Yes.

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.

(a) Yes.

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.

(a) Yes.

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.

(a) Yes.

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

1. Yes

2. No—a percentage uncertainty would be more appropriate

3. No – I agree with having a standard level of uncertainty, but 0.5 m³/m².h is not an appropriate figure.

4. No—I disagree for another reason

If no, please explain your reasoning.

(4) Yes.

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.

(a) Yes.

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.

(a) Yes.

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) Yes. There are concerns however that the research and testing appears incomplete.

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

(a) Yes.

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

a. Yes b. No

Please explain your reasoning.

(a) Yes.

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. No comments.

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.

(b) No. It is not considered to be clear who would benefit from this information but concerns are raised as to the appropriateness of this in an Approved Document.

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?

1. Yes

2. No there is no need for a standardised compliance report

3. 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

(a) Yes.

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

(a) Yes.

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

(a) Yes.

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.

(a) Yes.

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.

(a) Yes.

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

(a) Yes. Building Regulations already include provision for ensuring householders are provided with information to help operate systems efficiently. The proposal seems to be an extension of this provision. Further research should be able to produce a reasonable template from reviewing relevant warranty provider and / or CIBSE guidance.

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?

1. 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

2. 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.

(a) Yes. 3 months

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.

(a) Yes. It is still expected that contractors will commence lots of buildings but not progress at the expected rate. It is suggested that for Part L purposes progression should be to at least ground floor level.

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

(1). Agree with the three suggestions made in the consultation report.

(2). Could consider amending Building Regulation charges to include a 'carbon tax' onto of the inspection charge for units not commenced by the transition date OR rescind all applications / approvals for units not commenced on a particular development.

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.

(a) Yes. Assumptions seem fair and reasonable.

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.

(a) Yes. Assumptions seem fair and reasonable.