

The Future Homes Standard

POS response

February 2020

Context

POS is the single credible voice for public sector planners, pursuing good quality and effective planning practice. The Society's aim is to ensure that planning makes a major contribution to achieving sustainable development in ways that are fair and equitable and achieve the social, economic and environmental aspirations of the community.

We operate in three main ways:

- As a support network for planners in the public sector
- As promoters of best practice in planning
- As a think tank and lobbying organisation for excellence in planning practice

Where we can, we will work across the sector to craft proposals that have widespread support from the people who operate the planning system at the coalface: landowners, developers, agents, legal, local authorities and politicians. We will be both radical and practical as we look for solutions to tangible problems that will make a real difference to crucial areas. Our objective is to improve the planning system to enable it to deliver its key aim of sustainable development.

Response

The main feedback from POS is that if the Future Homes Standard is embedded in the Building Regulations then planning be prevented from having their own standard. This is the POS position on previous occasions that there should be a clear decision from Government as to whether planning or Building Regulations (or Environmental Health, Transport etc) should deal with something. Only one public authority agency should do so.

As to commenting on the rest of the document, POS has some general comments to make but has left many of the technical questions to be answered by Building Control colleagues. However we have some general points;

- POS would question the extent of this consultation, e.g. should this include commercial buildings as well as residential, should public sector constructed

buildings have more stringent requirements, would residential extensions be subject to Future Home Standard? Would it just be for newly constructed properties or conversions? Would it include any demolition and rebuilding which may come under future permitted development changes?

- Many local authorities have declared a Climate Emergency and are looking to Local Plans to help set standards to reduce carbon emissions. Government will need to be clear that this change will be met by Building Regulations for new build homes (need clarification on conversions and points raised above). However, Local Authorities may still want to set their own standards above current building regulations for non-residential buildings in light of their Climate Change declaration.
- Paragraph 2.25 sets out the confusion and variance between local planning authorities some of whom have set higher standards for energy efficiency above the current building regulations level. POS would urge government to work with the Planning Inspectorate on this as their Inspectors when assessing Local Plans can be consistent on Local Plans coming forward, especially on targets for non-residential buildings.
- In terms of certainty and consistency of Future Homes Standards we would suggest this is adopted in 2020 as many Local Plans will be adopted between now and 2025 which would considering the Climate Change declarations include policies helping LPAs to work towards zero carbon development.
- Considering the above points POS would suggest that Society of Local Authority Chief Executives (SOLACE), Royal Town Planning Institute (RTPI), local Government Association (LGA) are engaged with the considerations particularly around paragraphs 1.20 and 1.21 of the consultation
- An assessment should be carried out of any unintended consequences, such as the uplift in construction costs which could result in slowing down of housing delivery. This would have an impact on Housing Delivery Test (HDT) results. There should be an approach for measuring any impacts Future Homes Standard may have on housing delivery and HDT amended accordingly.
- Paragraph 2.7 sets out what should the Future Homes Standard look like, POS would suggest other items are taken into account, e.g. providing shade in gardens/on balconies to provide relief from heat in the summer months. Also including innovative ideas such as the flood proof housing by the British Research Establishment (BRE) <https://www.bre.co.uk/floodhouse>

- POS would urge that government engages with the electricity energy industry to plan for sufficient electricity in the grid. Headlines in the media suggesting that the grid cannot cope with electric cars does not help in promoting decarbonisation of peoples lifestyles and buildings <https://inews.co.uk/news/politics/electric-car-surge-exclusive-power-cuts-national-grid-overload-1366304>
- The consultation at paragraph 2.12 sets out that heat networks would form an important part of realising low carbon heat, particularly in cities and high-density areas. Government would be relying on single developers wanting to implement this to gain the accredited weighting in the Building Regulation standards but this is likely to require collaboration with neighbouring landowners to make the network successful and may not be a high roll out due to lack of strategic policies scoping out the potential capacity in a mixed use area and setting a vision for this form of infrastructure. POS would suggest that a district heat network needs to be planned for in an area and a requirement in Local Planning Policies otherwise they will not be delivered. This should be highlighted to Local Authorities and Planning Inspectors when drafting/reviewing Local Plans.
- POS would question paragraph 2.19 which sets out that a national minimum energy performance requirement must be met for all new homes in England, however, we understand that building regulations are applied with an element of pragmatism and flexibility which may mean these standards are not met.
- POS agrees with transition to move from high-carbon fossil fuels, however, we would urge government to set out positive support for solar and wind farms (including in sensitive locations). Planning Policy should be supportive of such infrastructure where as these are often controversial and get stuck in the planning system or refused. A National Plan setting out best locations for solar farms, wind farms harvesting energy from water etc. should be set out by government.
- The Future Homes Standards should include considerations of how the occupiers would use the homes. There are examples of affordable housing and student accommodation having communal boilers which may help in the heating demand of a building and with occupiers setting the heating to dry clothes whilst opening windows. Drying areas for clothes or providing dehumidifiers should be a consideration in homes and particularly blocks of flats as the way occupants use energy in their homes is often led by drying clothes or other activities with limited options.

<https://www.bre.co.uk/floodhouse>

Respondent details

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responding on behalf on an organisation

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.

Although POS are not experts in Building Regulations we would suggest that 75-80% is too low a reduction in CO₂. POS would also question whether it is the right approach to compare the improvement to existing CO₂ emissions as the housebuilding industry has not changed or innovated much in the past 50 years. Perhaps targets should be compared to other European countries and take account of other building techniques e.g. off site construction.

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?

POS would recommend that heating networks are planned for at a strategic level in planning policy and planing briefs to oblige house builders to include them as they often will require collaboration between landowners to allow for the variety of uses often required. This requires consultation with landowners and a commitment to collaborative working, also taking account of phasing.

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.

No comment

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 standards for dwellings?

- a. In 2020 alongside the introduction of any option to uplift to 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.

This needs careful consideration perhaps with the Planning Inspectorate, as they will be reviewing many Local Plans before 2025 and could well continue to find sound ambitious policies from Local Authorities seeking to respond to the Climate Change emergency. Planning Policies may also tackle non-residential uses which may lead to confusion with new homes energy targets covered in building regulations and Future Home Standard, but energy performance of commercial or other non-residential buildings set out in the Local Plan. POS would suggest that b) seems the most sensible route.

Q5 Do you agree with the proposed timings presented in Figure 2.1 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.

No comment

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.

POS would support c) the most ambitious target possible at current time and encourage review annually thereafter to continue innovation and more stringent targets.

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.

No comment

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

- a. Yes**
- b. No**

Please explain your reasoning.

No comment

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.

POS would make a general comment here that there needs to be sufficient electricity in the grid to continue to make this affordable when switching from gas in new build homes.

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 no, please suggest an alternative metric, explain your reason and provide evidence to support this.

No comment

Q11 Do you agree with the proposed minimum fabric standards set out in Table 3.1? If you do not agree with any one or more of the proposed standards, please explain your reasoning and provide evidence to support this.

No comment

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 comment

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.

No comment

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

- a. Yes
- b. No

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

No comment

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.

No comment

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

- a. Yes
- b. No

If no, please explain your reasoning.

Yes, however, POS would suggest that there may need to be support from Government for solar and wind farms as well as tidal. Many of these proposals are controversial and are delayed in the planning system. A national plan setting out the best opportunities for such renewable forms across the country would be helpful and transparent in communities.

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

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

Affordable housing, student accommodation and potentially others could be encouraged to include shared boilers and drying areas for clothes or dehumidifiers. This would highlight thinking on how occupants live in a building and do not put the heating on to dry clothes while having the windows open.

Also on shared buildings/public buildings the automatic door entrances are considered with an air lock system or similar to avoid losing warm air in the lobby entrance.

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.

No comment

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.

No comment

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.

No comment

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.

No comment

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.

No comment

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.

No comment

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.

No comment

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 an advantage to heat networks
- d. No – I disagree for another reason

Please explain your reasoning.

Q26 Do you agree with removing this 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.

No comment

Q27 Do you agree with the external references used in the draft Approved Document L, in 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 all of the proposals for restructuring the Approved Document guidance?

- a. Yes
- b. No

If no, please explain your reasoning.

No comment

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.

No comment

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.

No comment

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.

No comment

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.

No comment

Q43 Do you agree with the proposed approach 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.

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 and suggest any alternative sources.

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

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.

No comment

Q49 Do you agree that the limit to the credit 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.

No comment

Q50 Is having a standard level of uncertainty of 0.5m³/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 0.5m³/m².h is not an appropriate figure
- d. No – I disagree for another reason

If no, please explain your reasoning.

No comment

Q51 Currently, only a proportion of 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.

No comment

Q52 Currently, small developments are excluded from the requirement to undergo 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.

No comment

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 1.5m³/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.

No comment

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

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.

No comment

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

No comment

Q59 Do you agree with the introduction of a 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.

No comment

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.

No comment

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

Please explain your reasoning.

No comment

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

a. Yes

b. No

Please explain your reasoning.

No comment

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.

No comment

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.

Yes this seems sensible

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.

No comment

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.

No comment

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

No comment

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