

The Future Homes and Buildings Standards: 2023 consultation

POS response to consultation

March 2024

1 Planning Officers Society

1.1 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.

1.2 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

1.3 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. It is within this context that we have set out this advice to Government so we can plan together for a better future.

2 Key Messages

2.1 POS maintains its position as in previous consultation responses on this topic in 2023 that the Future Homes Standard should be embedded in the Building Regulations and that planning should therefore no longer need to have their own standard so that as a nation we reach net zero as quickly as possible. Elements that relate to the fabric of a dwelling, its services and how they are used are matters that are best dealt with through Building Control. Matters relating to site layout, orientation, spatial distribution, proximity to amenities, employment etc are matters that need to be discharged through the planning process.

2.2 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. 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.

3 Questions

Question 7. Which option for the dwelling notional buildings (for dwellings not connected to heat networks) set out in The Future Homes Standard 2025: dwelling notional buildings for consultation do you prefer?

a. Option 1 (higher carbon and bill savings, higher capital cost)

b. Option 2 (lower carbon savings, increase in bill costs, lower capital cost)

If you would like to caveat your response to Question 7 then commentary can be provided in response to Question 8. If you do not wish to state a preference between the two options, Question 7 can be left blank and comments can still be provided in response to Question 8.

Option 1 would be the best outcome for new occupiers and most effective way to deliver against a net zero carbon target rather than a substandard option 2 which would rely on individuals retrofitting buildings. Where there is an option to embed zero carbon this should be taken. Where policy shifts to this position developers and other policy makers can take account of it in case of any unintended consequences around viability or any other concerns.

Many Local Authorities have declared a climate emergency and option 1 will help officers articulate to members that the building regulations is the best tool to work towards zero carbon and show that it is moving quick enough.

Option 2 would not move legislation quick enough to where is needs to be and would be a missed opportunity.

Question 8. What are your priorities for the new specification? (select all that apply)

- low capital cost
- lower bills
- carbon savings
- other (please provide further information)

Please provide any additional comments to support your view on the notional building for dwellings not connected to heat networks.

Carbon savings and lower bills

The capital cost will be regularised throughout the viability and business model of house builders. Legislation changes are the main tool to affect changes to house builders' business model. Change on the scale needed will not happen without ambitious legislation change.

Question 9. Which option for the dwelling notional buildings for dwellings connected to heat networks set out in The Future Homes Standard 2025: dwelling notional buildings for consultation do you prefer?

- a. Option 1 (higher carbon and bill savings, higher capital cost)
- b. Option 2 (lower carbon savings, increase in bill costs, lower capital cost)

Please provide any additional comments on the specification of the heat network in the notional building.

Option 1

This allows for strategic consideration for connection to the heat network and increased uptake.

Question 10. Which option do you prefer for the proposed non-domestic notional buildings set out in the NCM modelling guide?

- a. Option 1
- b. Option 2

a) option 1

Question 11. What are your priorities for the new specification?

- low capital cost**
- lower bills**
- carbon savings**
- other (please provide further information)**

Please provide additional information to support your view on the proposed non-domestic notional buildings set out in the National Calculation Methodology modelling guide.

Lower bills and carbon savings

Question 12. Do you agree that the metrics suggested above (TER, TPER and FEE) be used to set performance requirements for the Future Homes and Buildings Standards?

- a. Yes**
- b. Yes, and I want to provide views on the suitability of these metrics and/or their alternatives**
- c. No, I think delivered energy should be used**
- d. No, I think FEE should be changed**
- e. No, for another reason (please provide justification)**

No comment

Question 13. Do you agree with the proposed changes to minimum building services efficiencies and controls set out in Section 6 of draft Approved Document L, Volume 1: Dwellings?

- a. Yes**
- b. Yes, and I want to provide additional suggestions or information to support my view**
- c. No (please provide justification)**

No, POS considers that the proposed changes to Part L should go further and be more ambitious.

Question 14. Do you agree with the proposal to include additional guidance around heat pump controls for homes, as set out in Section 6 of draft Approved Document L, Volume 1: Dwellings?

- a. Yes
- b. Yes, and I want to provide additional suggestions or information to support my view
- c. No (please provide justification)

Yes

Question 15. Do you agree that operating and maintenance information should be fixed to heat pump units in new homes?

- a. Yes
- b. Yes, and I want to provide additional suggestions or information to support my view
- c. No (please provide justification)

Yes

Question 16. Do you think that the operating and maintenance information set out in Section 10 of draft Approved Document L, Volume 1: Dwellings is sufficient to ensure that heat pumps are operated and maintained correctly?

- a. Yes
- b. Yes, and I want to provide additional suggestions or information to support my view
- c. No (please provide justification)

No, this is still relying on individuals to maintain these heat pumps. There should be a communication campaign led by the government on heat pumps generally, to increase up take for residents retrofitting their homes as well as for those moving in and using a heat pump for the first time. Housebuilders should have a welcome pack, video and tour

for new residents, so they are absolutely clear on the benefits and how to maintain a heat pump.

Question 17. Do you agree with the proposed changes to Section 4 of draft Approved Document L, Volume 1: Dwellings, designed to limit heat loss from low carbon heating systems?

- a. Yes
- b. Yes, and I want to provide additional suggestions or information to support my view
- c. No (please provide justification)

We also propose updating guidance on the sizing of domestic hot water storage vessels. This is set out in Section 5 of draft Approved Document L, Volume 1: Dwellings.

Yes

Question 18. Do you agree with the proposed sizing methodology for hot water storage vessels for new homes?

- a. Yes
- b. Yes, and I want to provide additional suggestions or information to support my view
- c. No (please provide justification)

No comment

Question 19. Do you agree with the proposed changes to minimum building services efficiencies and controls set out in Section 6 of draft Approved Document L, Volume 2: Buildings other than dwellings?

- a. Yes
- b. Yes, and I want to provide additional suggestions or information to support my view
- c. No (please provide justification)

No, POS feels the building regulations could go further.

Question 20. Do you agree with the proposed guidance on the insulation standard for building heat distribution systems in Approved Document L, Volume 2: Buildings other than dwellings?

- a. Yes**
- b. Yes, and I want to provide additional suggestions or information to support my view**
- c. No (please provide justification)**

No comment

Question 21. Do you agree that the current guidance for buildings with low energy demand which are not exempt from the Building Regulations, as described in Approved Document L, Volume 2: Buildings other than dwellings should be retained without amendment?

- a. Yes**
- b. Yes, and I want to provide additional suggestions or information to support my view**
- c. No (please provide justification)**

No, the guidance should be reviewed and amended. To go as far as possible, even considering low energy demand, it should be clean energy source working towards net zero carbon.

Question 22. Do you agree that lifts, escalators and moving walkways in new buildings (but not when installed within a dwelling) should be included in the definition of fixed building services?

- a. Yes**
- b. Yes, and I want to provide additional suggestions or information to support my view**
- c. No (please provide justification)**

No comment

Question 23. Do you agree with the proposed guidance for passenger lifts, escalators and moving walkways in draft Approved Document L, Volume 2: Buildings other than dwellings?

- a. Yes**
- b. Yes, and I want to provide additional suggestions or information to support my view**
- c. No (please provide justification)**

No comment

Question 24. Do you have any further comments on any other changes to the proposed guidance in draft Approved Document L, Volume 2: Buildings other than dwellings?

- a. Yes (please provide comments)**
- b. No**

No comment

Question 25. Should we set whole-building standards for dwellings created through a material change of use?

- a. Yes**
- b. No, an elemental standard should be set with an option to use a notional building if the designer prefers**
- c. No, for another reason (please provide justification)**

Yes, many buildings undergo a change of use, and it is likely that many more will favour this approach rather than demolition and rebuild. Therefore it is right to look at the whole building in this approach to working towards net zero carbon.

A second consideration is that many buildings may be encouraged to change use using further freedoms on permitted development and prior approval set by government and currently the subject of consultation on further changes. Therefore there would be an opportunity lost to not require a whole-building standard approach on these building at the time of substantial investment to change of use, most commonly to residential.

Question 26. Should the proposed new MCU standard apply to the same types of conversion as are already listed in Approved Document L, Volume 1: Dwellings?

- a. Yes**
- b. No, standards should also apply to non-dwelling accommodation e.g., student or patient accommodation, care homes, and hotels**
- c. No, the standard should be clearer that it applies to houses of multiple occupation (please recommend specific building types you think the standard should apply to and provide justification)**
- d. No, for another reason (please provide justification)**

B) and C)

Question 27. Should different categories of MCU buildings be subject to different requirements?

- a. Yes**
- b. No (please provide justification)**

No

Question 28. Which factors should be taken into account when defining building categories? (check all those that apply)

- height of the building, i.e., low versus mid- to high-rise buildings**
- floor area of the building**
- the expertise of those carrying out the work**
- whether the conversion is a part- or whole-building conversion**
- Other (please state)**

Please provide additional information to support your view.

Floor area of the building could be a consideration to allow very small change of use to not meet requirements. The height of the building or expertise would have no impact on how the building should be working towards meeting net zero.

Question 29. Do you agree with the illustrative energy efficiency requirements and proposed notional building specifications for MCU buildings?

- a. Yes
- b. No

No

Question 30. If you answered no to the previous question, please provide additional information to support your view. Select all that apply. The requirements are:

- too stretching
- not stretching enough
- not economically viable
- not practical/technically feasible
- other (please provide further details)

The performance requirements could be expressed through the same metrics as new dwellings:

the target primary energy rate

the target emission rate

the target fabric energy efficiency rate

Not stretching enough, many local authorities have declared climate emergencies and are relying on the building regulations to help address this.

Question 31. Do you agree with using the metrics of primary energy rate, emission rate and fabric energy efficiency rate, if we move to whole dwelling standards for MCU buildings?

- a. Yes
- b. Yes, and I want to provide additional suggestions or information to support my view
- c. No (please provide justification)

No comment

Question 32. Under what circumstances should building control bodies be allowed to relax an MCU standard?

- a. None, building control bodies should not be able to relax MCU standards**
- b. Building control bodies should be able to relax under the following circumstances (please provide further details)**

None

Question 33. Do you have views on how we can ensure any relaxation is applied appropriately and consistently?

Please select all that apply:

- there should be guidance on circumstances where relaxation of the notional standard may be appropriate**
- there should be monitoring of how relaxation is applied**
- only formal relaxation or dispensation through the local authority should be possible**
- other (please provide further details)**

Only formal relaxation or dispensation through the local authority should be possible in order to ensure that it only happens in very special circumstances.

Question 34. Should a limiting standard be retained for MCU dwellings?

- a. Yes (please provide further details)
- b. No, it is too strict
- c. No, it is not strict enough
- d. No, there is not enough information
- e. No, for another reason (please provide further details)

No comment

Question 35. If a limiting standard is retained, what should the limiting standard safeguard against?

Please select all that apply:

- risk of moisture, damp and mould
- high energy demand and energy bills (please provide recommended values referring to ADL volume 1 Table 4.3)
- other (please provide further details)

No comment

Question 36. Do you wish to provide any evidence on the impacts of these proposals including on viability?

- a. Yes (please provide evidence)
- b. No

No comment

Question 37. Do you agree that a BREL report should be provided to building control bodies if we move to energy modelling to demonstrate compliance with MCU standards?

- a. Yes
- b. Yes, and photographic evidence is needed
- c. Yes, and I'd like to provide further information
- d. No (please provide justification)

We could also extend the application of Home User Guides to include properties that have undergone a Material Change of Use (MCU). These guides would provide buyers with critical operating and maintenance information, mitigating the risk of unexpected costs and inefficiencies. This move would aim to further address the discrepancies in quality and performance between MCU dwellings and new builds, ensuring that buyers have accurate information at their disposal. We provide more information about Home User Guides, and ask for feedback on ways that Home User Guides could be improved, in Section 8.4.

No comment

Question 38. Do you agree that consumers buying homes created through a material change of use should be provided with a Home User Guide when they move in?

- a. Yes**
- b. Yes, and I'd like to provide further information**
- c. No (please provide justification)**

Yes

Question 39. Do you agree that homes that have undergone an MCU should be airtightness tested?

- a. Yes**
- b. Yes, and I'd like to provide further information**
- c. No (please provide justification)**

Yes

Question 40. Do you think that we should introduce voluntary post occupancy performance testing for new homes?

- a. Yes**
- b. Yes, and I'd like to provide further information**
- c. No (please provide justification)**

Yes

Question 41. Do you think that the government should introduce a government-endorsed Future Homes Standard brand? And do you agree permission to use a government-endorsed Future Homes Standard brand should only be granted if a developer's homes perform well when performance tested? Please include any potential risks you foresee in your answer.

- a. Yes**
- b. Yes, and I want to provide additional suggestions or information**
- c. Yes, but I think there are risks associated with introducing a government-endorsed brand**

d. No (please provide justification)

A) yes

Question 42. Do you agree with the proposed changes to Approved Document F, Volume 1: Dwellings to improve the installation and commissioning of ventilation systems in new and existing homes?

a. Yes

b. Yes, and I'd like to provide further information

c. No (please provide justification)

No comment

Question 43. Do you agree with the proposal to extend Regulation 42 to the installation of mechanical ventilation in existing homes as well as new homes?

a. Yes

b. Yes, and I'd like to provide further information

c. No (please provide justification)

Yes

Question 44. Do you think the guidance on commissioning hot water storage vessels in Section 8 of draft Approved Document L, Volume 1: Dwellings is sufficient to ensure they are commissioned correctly?

a. Yes

b. Yes, and I'd like to provide further information

c. No (please provide justification)

We have not amended the guidance in Section 8 of Approved Document L, Volume 1: Dwellings around how heat pumps should be commissioned. Our view is that the current guidance is sufficient. We would, however, welcome views on potential amendments or additions.

No comment

Question 45. Are you aware of any gaps in our guidance around commissioning heat pumps, or any third-party guidance we could usefully reference?

- a. Yes (please provide further details)
- b. No

No comment

Question 46. Do you think the guidance for commissioning on-site electrical storage systems in Section 8 of draft Approved Document L, Volume 1: Dwellings is sufficient to ensure they are commissioned correctly?

- a. Yes
- b. Yes, and I'd like to provide further information
- c. No (please provide justification)

No comment

Question 47. Do you agree with proposed changes to Approved Document L, Volume 1: Dwellings and Approved Document F, Volume 1: Dwellings to (a) clarify the options for certifying fixed building services installations and (b) set out available enforcement options where work does not meet the required standard?

- a. Yes
- b. Yes, and I'd like to provide further information
- c. No (please provide justification)

The government intends to consult separately on changes to the minimum technical competencies (MTCs) that members of competent person schemes must demonstrate.

No comment

Question 48. Do you think the additional information we intend to add to the Home User Guide template, outlined above, is sufficient to ensure home occupants can use their heat pumps efficiently?

- a. Yes
- b. Yes, and I'd like to provide further information

c. No (please provide justification)

Yes its a step forward, although POS recommends this is reviewed to be sure it is sufficient

Question 49. If you are a domestic developer, do you use, or are you planning to use, the Home User Guide template when building homes to the 2021 uplift?

Please give reasons in your response.

- a. Yes (please provide further details)
- b. No (please provide further details)

No comment

Question 50. Do you have a view on how Home User Guides could be made more useful and accessible for homeowners and occupants, including on the merits of requiring developers to make guides available digitally? Please provide evidence where possible.

- a. Yes, (please provide further details)
- b. No

No comment

Question 51. Do you think that there are issues with compliance with Regulations 39, 40, 40A and 40B of the Building Regulations 2010? Please provide evidence with your answer.

- a. Yes (please provide justification)
- b. No (please provide justification)

No comment

Question 52. Do you think that local authorities should be required to ensure that information required under Regulations 39, 40, 40A and 40B of the Building Regulations 2010 has been given to the homeowner before issuing a completion certificate?

- a. Yes
- b. Yes, and I'd like to provide further information
- c. No (please provide justification)

No comment

Question 53. Do you agree that new homes and new non-domestic buildings should be permitted to connect to heat networks, if those networks can demonstrate they have sufficient low-carbon generation to supply the buildings' heat and hot water demand at the target CO2 levels for the Future Homes or Buildings Standard?

- a. Yes
- b. Yes, and I'd like to provide further information
- c. No (please provide justification)

Yes

Question 54. Do you agree that newly constructed district heating networks (i.e., those built after the Future Homes and Buildings Standard comes into force) should also be able to connect to new buildings using the sleeving methodology?

- a. Yes
- b. Yes, and I'd like to provide further information
- c. No (please provide justification)

Yes

Question 55. Do you agree with the proposed guidance on sleeving outlined for Heat Networks included in Approved Document L, Volume 1: Dwellings and Approved Document L, Volume 2: Buildings other than dwellings?

- a. Yes
- b. Yes, and I'd like to provide further information
- c. No (please provide justification)

No comment

Question 56. Do you agree that heat networks' available capacity that does not meet a low carbon standard should not be able to supply heat to new buildings?

a. Yes

b. No (please provide further details regarding how this unused higher carbon capacity should be accounted for)

No comment

Question 57. What are your views on how to ensure low-carbon heat is used in practice?

No comment

Question 58. Are there alternative arrangements for heat networks under the Future Homes and Building Standards that you believe would better support the expansion and decarbonisation of heat networks?

No comment

Question 59. Do you agree that the draft guidance provides effective advice to support a successful smart meter installation in a new home, appropriate to an audience of developers and site managers?

a. Yes

b. No

If not, please provide suggestions for how the draft guidance could be improved. Please provide evidence and sources for your statements where appropriate.

No comment

Question 60. Do you agree that voluntary guidance referenced in draft Approved Document L, Volume 1: Dwellings is the best approach to encouraging smart meters to be fitted in all new domestic properties?

a. Yes

b. No

If not, is there anything else you think the government should be doing to ensure that smart meters are fitted in all new build properties?

No comment

Question 61. Do you agree that it should be possible for Regulation 26 (CO2 emission rates) to be relaxed or dispensed with if, following an application, the local authority or Building Safety Regulator concludes those standards are unreasonable in the circumstances?

a. Yes**b. No (please provide justification)**

No, the example given in the consultation document is very unique and the opportunity for relaxation allow room for judgment which is likely to have unintended circumstances of different levels of consideration across the country. The role of Future Homes Standards should be to regularise the construction to meet net zero carbon targets. Any unique examples should be dealt with in a different way.

There is also likely to be a resource implication in already stretched local authorities and building control departments to consider relaxed or dispensed arguments which should come with a fee if they are introduced reflective of the time taken to come to a decision.

Question 62. [If yes to previous question], please share any examples of circumstances where you think it may be reasonable for a local authority to grant a relaxation or dispensation?

Question 63. Do you think that local authorities should be required to submit the applications they receive, the decisions they make and their reasoning if requested?

a. Yes**b. Yes, and I'd like to provide further information****c. No (please provide justification)**

No comment

Question 64. Are there any additional safeguards you think should be put in place to ensure consistent and proportionate use of this power?

No comment

Question 65. Do you agree that Part L1 of Schedule 1 should be amended, as above, to require that reasonable provision be made for the conservation of energy and reducing carbon emissions?

- a. Yes**
- b. Yes, and I'd like to provide further information**
- c. No (please provide justification)**

No comment

Question 66. Do you agree that regulations 25A and 25B will be redundant following the introduction of the Future Homes and Buildings Standards and can be repealed?

- a. Yes**
- b. Yes, and I'd like to provide further information**
- c. No (please provide justification)**

No comment

Question 67. Do you agree that the Home Energy Model should be adopted as the approved calculation methodology to demonstrate compliance of new homes with the Future Homes Standard?

- a. Yes**
- b. Yes, and I'd like to provide further information**
- c. No (please provide justification)**

Yes

Question 68. Please provide any comments on the parameters in the notional building.

No comment

Question 69. Minimum standards already state that heat pumps should have weather compensation and we would like to understand if stakeholders think this is enough to ensure efficiency of heat pumps under the varying weather conditions across England. Should the notional building use local weather?

a. Yes

b. No

No comment

Question 70. Do you agree with the revised guidance in The Future Homes Standard 2025: dwelling notional buildings for consultation no longer includes the average compliance approach for terraced houses?

a. Yes

b. No

No comment

Question 71. Do you agree with the revised guidance in Approved Document L, Volume 1: Dwellings which states that you should not provide a chimney or flue when no secondary heating appliance is installed?

a. Yes

b. No

Please provide any further evidence.

Yes, this would help prevent occupiers considering installation of a log burner. Some may be concerned that this would have an impact on the character and appearance of an area, but POS considered this would be a positive move looking forward and thinking honestly about building design and not installing false chimneys to deliver a pastiche only approach to respecting local character and appearance.

Question 72. Do you agree with the proposed approach to determine U-values of windows and doors in new dwellings?

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

No comment

Question 73. Do you agree with the proposal to remove the default y-value for assessing thermal bridges in new dwellings?

- a. Yes**
- b. Yes, and I'd like to provide further information**
- c. No (please provide justification)**

No comment

Question 74. Do you have any information you would like to provide on the homes built to the Future Homes Standard using curtain walling?

No comment

Question 75. Do you agree with the methodology outlined in the NCM modelling guide for the Future Buildings Standard?

- a. Yes,**
- b. No (please provide justification)**

No comment

Question 76. Please provide any further comments on the cSBEM tool which demonstrates an implementation of the NCM methodology.

No comment

Question 77. Please provide any further comments on the research documents provided alongside the cSBEM tool and which support the development of the NCM methodology, SBEM and iSBEM.

No comment

Question 78. Which option describing transitional arrangements for the Future Homes and Buildings Standard do you prefer? Please use the space provided to provide further information and/or alternative arrangements.

a. Option 1

b. Option 2

Please provide further information or suggest alternative transitional arrangements with your rationale and supporting evidence.

Option 1

Question 79. Will the changes to Building Regulations proposed in this consultation lead to the need to amend existing planning permissions? If so, what amendments might be needed and how can the planning regime be most supportive of such amendments?

a. Yes (please provide further information)

b. No

Whether that is the case will turn on the facts of each case, but in most cases, these matters relate to the fabric of buildings and the installation and operation of their various services which will rarely have aesthetic implications for planning. Any alterations to external appearances are most likely to be non-material (capable of being dealt with using s96a) or de minimus and not need any formal authorisation. Any changes that are material should fall within the remit of s73B when that becomes operative.

Question 80. Do you agree that the 2010 and 2013 energy efficiency transitional arrangements should be closed down, meaning all new buildings that do not meet the requirements of the 2025 transitional arrangements would need to be built to the Future Homes and Buildings Standards?

a. Yes

b. No (please provide justification)

Yes

Question 81. What are your views on the proposals above and do you have any additional evidence to help us reach a final view on the closing of historical transitional arrangements?

No comment

Question 82. Part O does not apply when there is a material change of use. Should it apply?

a. Yes

b. Yes, but only for some types of conversion (please list from reg 5a-k or describe the type)

c. No

Please provide more details about why Part O should/should not apply to a material change of use and, if possible, point to existing evidence/examples that demonstrates your view.

Yes

Question 83. Apart from material change of use, is there anything missing from the current scope of Part O?

a. Yes, (please provide justification)

b. No, (please provide justification)

No comment

Question 84. Can you provide evidence on how the addition of extensions or conservatories to domestic buildings can impact overheating risk on an existing building?

a. Yes, (please provide justification)

b. No

No comment

Question 85. We are currently reviewing Part O and the statutory guidance in Approved Document O. Do you consider there to be omissions or issues concerning the statutory guidance on the simplified method for demonstrating compliance with requirement O1, for buildings within the scope of requirement O1?

a. Yes (please provide justification)

b. No

No comment

Question 86. Do you consider there to be omissions or issues concerning the statutory guidance on the dynamic thermal modelling method for demonstrating compliance with requirement O1 for all residential buildings?

a. Yes, (please provide justification)

b. No

No comment

Question 87. Do you consider there to be omissions or issues concerning the statutory guidance on ensuring the overheating mitigation strategy is usable for buildings within the scope of requirement O1?

a. Yes, (please provide justification)

b. No

No comment

Question 88. Do you consider there to be omissions or issues concerning the statutory guidance on protection from falling?

a. Yes, (please provide justification)

b. No

No comment

Question 89. Are you aware of ways that Approved Document O could be improved, particularly for smaller housebuilders?

a. Yes, (please provide justification)

b. No

No comment

Question 90. Does Regulation 40B require revision?

a. Yes, (please provide justification)

b. No

No comment

Question 91. Do you consider there to be omissions or issues concerning the statutory guidance on providing information?

a. Yes, (please provide justification)

b. No

Question 92. Are there any improvements that you recommend making to the information provided about overheating in the Home User Guide template?

a. Yes, (please provide justification)

b. No

No comment

Question 93. Are there any omissions or issues not covered above with the statutory guidance in Approved Document O that we should be aware of?

a. Yes

b. No

No comment

Question 94. Please provide any feedback you have on the potential impact of the proposals outlined in this consultation document on persons who have a

protected characteristic. If possible, please provide evidence to support your comments.

No comment

Question 95. Please provide any feedback you have on the impact assessments.

No comment