

## Government Consultation of Future Homes Standard

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/852605/Future\\_Homes\\_Standard\\_2019\\_Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/852605/Future_Homes_Standard_2019_Consultation.pdf)

**Housing makes up one fifth of UK CO2 emissions. Many tens of thousands of new houses are planned to be built in Oxfordshire in the next decade and, yet, our building standards are woefully out of date. Belatedly the Government are proposing an uplift to building standards as they affect energy use and carbon dioxide emissions. We cannot achieve our emission reduction targets if we do not reduce emissions from domestic buildings and houses built now will last well beyond 2050, when the UK emissions are targeted to be zero.**

**The consultation document also makes vague promises for a consultation for updated standards for existing homes and non-residential buildings. The timetable suggested is clearly not consistent with the Government's own declaration of a Climate Emergency and there is general lack of urgency in these proposals.**

**While a step in the right direction the current proposals are woefully inadequate. We call for:**

- 1. All houses built after 2025 must be zero carbon.**
- 2. From 2020 the fabric of housing must be improved to zero carbon standards and infrastructure put in place to allow the easy retrofit of new technologies, such as heat pumps and solar panels.**
- 3. Local Authorities should have the power to improve on these regulations to achieve their emission targets.**

**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**

*To provide an appropriate and urgent response to the climate change emergency all new buildings built from 2025 need to operate at annual net zero carbon emissions. Houses built now will be used for at least 50 years. This means that to reach the UK emission targets any houses not built to a zero carbon standard will need an expensive retrofit. The Committee on Climate Change report (UK housing: fit for the future, Feb. 2019) estimate it would cost £26,300 to retrofit a house compared to £4,800 build to a high standard (table 1.1).*

*As a stepping stone, we propose that in 2020 the projected energy consumption of all new homes should be outlined (in a format that supports data protection) to understand energy consumption as a driver for improving operational performance. We also propose that compliance is improved to close the widely recognised performance gap between design and build quality.*

*In 2025 (Future Homes Standard) compliance should be based on operational performance based on (metered) kWh/m<sup>2</sup>/yr targets (e.g. domestic display energy certificate (DEC)).*

**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**

*The Intergovernmental Panel on Climate Change (IPCC) report (October 18) makes it clear that it is now urgent that we reduce carbon emissions, stating that we need to reduce emissions by 50% by 2030 to prevent dangerous consequences of Climate Change.*

*65% of local authorities across the UK have responded to this by declaring a climate emergency and setting their own stretching planning targets. Local authorities are much better placed to assess local need and viability of their area.*

*Our ability to slow climate change depends on their ambitious response and their zero carbon plans. Government should therefore not be seeking to take this away but instead be supporting them.*

*Historically the purpose of Building Regulations has been to set minimum standards as a basic industry provision. We would therefore suggest it is not the purpose of Building Regulations to strip local authorities of their powers or ability to go beyond this minimum.*

**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**

*It must be reiterated we have a Climate Emergency – this has been declared nationally and by the majority of local authorities. An Emergency requires quick and immediate action. The IPCC 1.5° report demonstrates we need to reduce emissions by 50% by 2030 and zero by 2060 (at the latest). Houses built now will still be used in 2060 so it is absolutely essential that we move to zero carbon homes as soon as possible.*

*It is key that consultation on the future homes standard is carried out as soon as possible, so that developers and design teams can prepare themselves for the changes that are to come.*

*We note there are proposals for consultations on existing homes and non-residential buildings suggested in fig. 2.1. These are as urgent as new homes standards. We note the timing on these has already slipped and we urge action as a matter of urgency.*

**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**

*These options do not go far enough on fabric efficiency. We should not be designing and building homes in 2020 that will need retrofitting with additional insulation in the future. A well-insulated house represents our best chance of meeting the UK's climate commitments.*

*Fabric should always be the first step in reducing carbon emissions, with technology reducing the remaining emissions. The proposals of 20% and 31% reductions do not push fabric, comfort and well-being hard enough. Under Part L 2013 there is a Fabric Energy Efficiency Standard (FEES) metric which helps prevent homes being designed with a fabric worse than the 'notional' building. While the 'notional' fabric specification has been improved marginally in the Future Homes 2020 consultation, the FEES target has been scrapped. This means that homes can be designed using the 'minimum' building fabric u-values as long as the building passes the carbon and primary energy targets. Where an energy efficient heating system (such as an air source heat pump) is specified the building is able to pass these targets with a poor building fabric. This is a loophole that overrides the need to have a well-insulated fabric building represents our greatest chance of meeting our climate commitments in new homes. The Future Homes Standard 2020 does not promote a well-insulated building fabric. Under the new regulations new homes could be less.*

*The options given here are really Hobson's Choice. Option 1 provides for improved building fabric but no future proving in terms of heating systems. Option 2 abandons serious fabric improvements but introduces the possibility of, poorly specified, new heating systems. We need to combine these two options to include both improved housing fabric and introduce clearly specified improved heating systems (such as air source heat pumps and solar panels). We also need to ensure any interim uplift provides a clear and affordable retrofit pathway.*

**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**

*The performance gap, i.e. the difference between designed performance and built performance, has been repeatedly identified as a major issue on new homes (for example by the Committee on Climate Change report (UK housing: fit for the future, Feb. 2019). There needs to be a major revamp of how Building Control sign off new builds. For example each new house needs to be tested for airtightness, thermal bridging etc. and evidence provided to Building Control and the householder.*