

The Future Homes and Buildings Standards – 2023 Consultation

Response by Association of Directors of Environment, Economy, Planning & Transport (ADEPT)

Introduction

ADEPT welcomes the consultation on Future Homes and Buildings Standards and the government's commitment to improving the energy efficiency and reducing the carbon emissions of new homes and non-domestic buildings. ADEPT is the voice of place directors whose services are responsible for delivering sustainable development at a local level. All of its members represent local authorities who are committed to the achievement of net zero and the Future Homes and Building Standards will be a vital tool in the drive to achieve this.

Response to Consultation

The response comprises a summary of main points on the principle and approach towards the standards, together with specific replies to some of the consultation questions where ADEPT feels it can add value to the consultation.

Summary of main points

- ADEPT is supportive in principle of the Future Homes and Buildings Standards but considers that standards need to be delivered at an accelerated pace if the carbon savings are to be achieved. This should include new builds, conversions/changes of use, and also retro-fitting of solutions for the existing stock.
- Greater support is also needed for existing occupiers to achieve the necessary improvements
- ADEPT is concerned that the standards being consulted on are not sufficiently ambitious to meet the critical climate imperative, are overly reliant on decarbonising the grid rather than reducing at source, and do not go far enough in considering embodied carbon
- The consultation document (para. 4.2.3) notes that the 2025 FHS will keep standards largely the same as 2021 (Part L). This therefore misses a crucial opportunity to make the step change needed to deliver building stock that meets the challenges we face. level.
- It is welcome that new standards will apply to material changes of use and conversions, in the form of whole dwelling performance standards.
- It is noted that the 'notional dwelling' for these types of work would differ to that of a new build dwelling, resulting in different target rates. Costs and issues associated with this type of development are different to that of new builds, and the 'retrofit' of some buildings to meet higher standards may be more challenging in these cases than for a new build (such as listed buildings). ADEPT would, however, like to see some further details and research to justify the use of a different notional dwelling for this type of work. In principle, the aim should be to attain the highest achievable standards.

- Regarding performance standards of new dwellings, there are two options proposed for the notional dwelling. Option 1 includes additional requirements for decentralised mechanical ventilation, wastewater heat recovery and photovoltaic panels. Dwellings comprising these features would result in lower running costs for the occupant and would generally represent better energy performance, moving closer to a net-zero outcome than Option 2, which does not include these requirements. Whilst Option 1 would result in higher upfront costs, ADEPT considers it is important, given the urgent need to address climate change, that new dwellings are built as close to net-zero as possible, and therefore **Option 1 is favourable to Option 2** (although note comments made about the need to be as ambitious as possible). It is felt that once higher standards come into effect additional costs should come down relatively over time with increased production/competition in the technology market, and homes built to this standard would be inherently more marketable for developers.
- ADEPT notes that the consultation has not set out other more ambitious options identified in the '[Ready for Zero](#)' Task Group report (28 February 2023). This provided evidence to inform the FHS and includes five 'Contender Specifications', including CS4 (which seeks to minimise space and water heating, drawing on UK and European best practice) and CS5 which is to improve fabric efficiency to maintain comfortable temperature without a heating system. Whilst it is acknowledged costs would be higher, there may be circumstances where these can be delivered, if funding, delivery and longer-term costs/benefits are taken into account, given that demands upon the grid and energy costs would be greatly reduced.
- The proposed Primary Energy, Carbon Emissions and Fabric Energy Efficiency metrics for measuring energy efficiency of new homes remain based on a 'SAP' methodology through the 'notional dwelling' approach, which does not take into account unregulated 'operational' use of a dwelling. Other methods of measuring energy performance, such as through using Energy Use Intensity metrics which would take into account unregulated energy at building level, have been promoted in the net-zero development sector, and adopted within local plan policies of several local authorities (e.g. Cornwall, BANES). With the growing uptake of these alternative approaches, ADEPT would like to further understand the reasoning behind these not being brought forward as part of the Future Homes and Building Standards consultation, and whether/how the government has considered the benefits of adopting a system which can better predict the operational use of a dwelling.
- ADEPT is also aware of the Written Ministerial Statement¹ of December 13, 2023, which seeks to restrict the ability for local authorities to set energy performance standards above national standards, outside of using the SAP methodology. Whilst there are benefits in a consistent system/standard across the country, the approach of the WMS is potentially limiting for specific developments that have the potential to achieve true net-zero carbon emissions, or carbon negative emissions, as the SAP

¹ Planning – Local Energy Efficiency Standards Update: Statement made on 13 December 2023 (Statement UIN HCWS123)

methodology does not allow for unregulated operational energy used in a building. This might undermine the national and local declarations of a climate emergency and the strategies in place to achieve carbon neutrality. ADEPT would therefore support some degree of local discretion to seek the highest achievable standards (such as Passivhaus plus or premium) in appropriate situations. This might occur on larger sites where the site conditions, ownership, and viability are right to support the best possible performance. ADEPT would advocate further consultation on options for such an approach.

- Transitional arrangements should be ambitious to capture as much carbon savings as possible, but ADEPT acknowledges that there needs to be sufficient time for the construction industry, suppliers and regulators to prepare – this will need careful consideration and appropriate support to facilitate the fastest possible transition.
- ADEPT would ask that the government revises the approach to more ambitious standards which reduce demands on the grid, minimise fuel bills, secure embodied carbon and sustainable procurement, and help upskill the building and construction sector.

Response to Specific Consultation Questions

No.	Question	ADEPT Response
4 Performance requirements for new buildings		
07	<p>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?</p> <p>a. Option 1 (higher carbon and bill savings, higher capital cost)</p> <p>b. Option 2 (lower carbon savings, increase in bill costs, lower capital cost)</p>	<p>Option 1 is preferred.</p> <p>Option 1 includes additional requirements for decentralised mechanical ventilation, wastewater heat recovery and photovoltaic panels. Dwellings comprising these features would result in lower running costs for the occupant and would generally represent better energy performance, moving closer to a net-zero outcome than Option 2, which does not include these requirements. Whilst Option 1 would result in higher upfront costs, ADEPT considers it is important, given the urgent need to address climate change, that new dwellings are built as close to net-zero as possible. It is felt that once higher standards come into effect additional costs should come down relatively over time with increased production/competition in the technology market, and homes built to this standard would be inherently more marketable for developers.</p> <p>ADEPT questions why the consultation has not set out other more ambitious options which were considered in the 'Ready for Zero' Task Group report (28 February 2023). This provided evidence to inform the FHS and includes five 'Contender Specifications' (CS's), including CS4 (which seeks to minimise space and water heating, drawing on UK and European best practice) and CS5 which is to improve fabric efficiency to maintain comfortable temperature without a heating system. Whilst it is acknowledged costs would be higher, there may be circumstances where these can be delivered, if funding, delivery and longer-term costs/benefits are taken into account, given that demands upon the grid and energy costs would be greatly reduced.</p> <p>It is noted that the government intends to carry out future consultation on</p>

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No.	Question	ADEPT Response
		<p>embodied carbon in due course.</p> <p>However, ADEPT considers that it is important for the construction sector to be prioritising reduction and a fabric first approach, including consideration of embodied carbon. The FHS could assist in gearing the sector up for sustainable procurement and manufacturing, and reduce the risk of unintended consequences (whereby energy savings could be undermined by less attention being paid to reduction as a first principle.</p>
08	<p>What are your priorities for the new specification? (select all that apply)</p> <p><input type="checkbox"/> low capital cost</p> <p><input type="checkbox"/> lower bills</p> <p><input type="checkbox"/> carbon savings</p> <p><input type="checkbox"/> other (please provide further information)</p> <p>Please provide any additional comments to support your view on the notional building for dwellings not connected to heat networks.</p>	<p>Carbon savings and lower energy bills should be the priorities.</p> <p>Higher performance, including fabric efficiencies as part of the mix, will deliver carbon savings, reduce bills and create greater grid resilience, in turn protecting consumers from energy price fluctuations.</p>
09	<p>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?</p> <p>a. Option 1 (higher carbon and bill savings, higher capital cost)</p> <p>b. Option 2 (lower carbon savings, increase in bill costs, lower capital cost)</p> <p>Please provide any additional comments on the specification of the heat network in the notional building.</p>	<p>Option 1 is preferable due to lower energy use, lower energy bills, reduced grid demand and inclusion of PVs, which protects consumers from energy price fluctuations.</p>
10	<p>Which option do you prefer for the proposed non-domestic notional buildings set out in the NCM modelling guide?</p> <p>a. Option 1</p> <p>b. Option 2</p>	<p>Option 1 is preferable in line with the priorities stated above.</p>
11	<p>What are your priorities for the new specification?</p> <p><input type="checkbox"/> low capital cost</p> <p><input type="checkbox"/> lower bills</p> <p><input type="checkbox"/> carbon savings</p> <p><input type="checkbox"/> other (please provide further information)</p> <p>Please provide additional information to support your view on the proposed non-</p>	<p>Carbon savings and lower energy bills should be the priorities.</p>

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No.	Question	ADEPT Response
	domestic notional buildings set out in the National Calculation Methodology modelling guide	
5 Metrics		
12	<p>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?</p> <p>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)</p>	<p>e) No for another reason:</p> <p>Energy use intensity (EUI) should be used as it captures total energy use, including unregulated energy, which the proposed FHS approach does not. EUI standards would better address the aim of net zero and can be predicted at design stage, measured when in use, and facilitates similar building types to be compared. It is also more straightforward for the construction industry and consumers to understand. Inclusion of a fabric energy metric should also be considered.</p> <p>Alternatively using delivered energy would allow for consistency of metrics and would allow residents and building users to measure performance focusing on the build-quality/fabric performance only rather than incorporating external factors.</p>
6. Updates guidance and minimum standards		
13	<p>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?</p> <p>a. Yes b. Yes, and I want to provide additional suggestions or information to support my view c. No (please provide justification)</p>	<p>ADEPT is aware of concerns that decentralised mechanical ventilation could be detrimental to air quality as incoming fresh air will be through trickle vents and the gaps in the non-airtight fabric which does not get filtered. Also, there is no specification for heat recovery within the extract method which means extracted air's heat will be lost. This should be considered before final FHS is issued.</p>
14	<p>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?</p> <p>a. Yes b. Yes, and I want to provide additional suggestions or information to support my view c. No (please provide justification)</p>	<p>a. Yes</p>
15	Do you agree that operating and maintenance information should be fixed to	<p>a. Yes</p>

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No.	Question	ADEPT Response
	<p>heat pump units in new homes?</p> <p>a. Yes</p> <p>b. Yes, and I want to provide additional suggestions or information to support my view</p> <p>c. No (please provide justification)</p>	
16	<p>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?</p> <p>a. Yes</p> <p>b. Yes, and I want to provide additional suggestions or information to support my view</p> <p>c. No (please provide justification)</p>	
17	<p>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?</p> <p>a. Yes</p> <p>b. Yes, and I want to provide additional suggestions or information to support my view</p> <p>c. No (please provide justification)</p> <p>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.</p>	<p>It is considered that further explanation / consultation may be needed on this aspect.</p>
18	<p>Do you agree with the proposed sizing methodology for hot water storage vessels for new homes?</p> <p>a. Yes</p> <p>b. Yes, and I want to provide additional suggestions or information to support my view</p> <p>c. No (please provide justification)</p>	<p>It is considered that further explanation / consultation may be needed on this aspect.</p>
19	<p>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?</p> <p>a. Yes</p> <p>b. Yes, and I want to provide additional suggestions or information to support my view</p> <p>c. No (please provide justification)</p>	
20	<p>Do you agree with the proposed guidance on</p>	

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No.	Question	ADEPT Response
	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)	
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)	
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)	
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)	a.
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	
7. Material Change of Use		
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	a. Yes. This will be an important way of repurposing existing buildings to modern efficiency standards and ensuring future residents/occupants benefit from

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No.	Question	ADEPT Response
	with an option to use a notional building if the designer prefers c. No, for another reason (please provide justification)	reduced bills.
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)	Agree with response b. No. The standards should also apply to non-dwelling accommodation (student or patient accommodation, care homes, and hotel and houses in multiple occupation. In the case of listed buildings other approaches may need to be considered as such buildings make up less than 5% of stock nationally, and internal features may be of architectural/historic importance.
27	Should different categories of MCU buildings be subject to different requirements? a. Yes b. No (please provide justification)	a. Yes as there may be different factors to take into account, such as in listed buildings or conservation areas where features of architectural/historic interest need to be retained.
28	Which factors should be taken into account when defining building categories? (check all those that apply) <input type="checkbox"/> height of the building, i.e., low versus mid- to high-rise buildings <input type="checkbox"/> floor area of the building <input type="checkbox"/> the expertise of those carrying out the work <input type="checkbox"/> whether the conversion is a part- or whole-building conversion <input type="checkbox"/> Other (please state) Please provide additional information to support your view.	
29	Do you agree with the illustrative energy efficiency requirements and proposed notional building specifications for MCU buildings? a. Yes b. No	
30	If you answered no to the previous question, please provide additional information to support your view. Select all that apply. The requirements are: <input type="checkbox"/> too stretching <input type="checkbox"/> not stretching enough	

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No.	Question	ADEPT Response
	<input type="checkbox"/> not economically viable <input type="checkbox"/> not practical/technically feasible <input type="checkbox"/> other (please provide further details)	
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)	c. No – delivered energy metric would be preferable as it can be measured post-occupancy.
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)	a. None. It will be important for clarity around the role of Building Control and the construction industry/developers to maintain faith and certainty in the standards, eliminate any watering down of quality and avoiding potential loopholes.
33	Do you have views on how we can ensure any relaxation is applied appropriately and consistently? Please select all that apply: <input type="checkbox"/> there should be guidance on circumstances where relaxation of the notional standard may be appropriate <input type="checkbox"/> there should be monitoring of how relaxation is applied <input type="checkbox"/> only formal relaxation or dispensation through the local authority should be possible <input type="checkbox"/> other (please provide further details)	
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)	c. No. MCU should seek to achieve the same standard as new build other than for carefully evidenced exceptions such as listed buildings
35	If a limiting standard is retained, what should the limiting standard safeguard against? Please select all that apply: <input type="checkbox"/> risk of moisture, damp and mould	Other: conversion of listed buildings may require a bespoke approach.

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No.	Question	ADEPT Response
	<input type="checkbox"/> high energy demand and energy bills (please provide recommended values referring to ADL volume 1 Table 4.3) <input type="checkbox"/> other (please provide further details)	
36	Do you wish to provide any evidence on the impacts of these proposals including on viability? a. Yes (please provide evidence) b. No	
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)	c. Yes, in addition to photographic evidence and reporting on EUI and space heat demand should be included
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)	b. Yes – this is useful for new technology – although an MCU home should be of the same quality and standard of a new build (other than listed buildings)
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)	b. Yes.
8. Real-world performance of homes		
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)	B. Yes and I'd like to provide further information Post-occupancy reporting and monitoring is needed to ensure difference between actual versus design prediction is minimised – this should be mandatory.
41	Do you think that the government should introduce a government-endorsed Future Homes Standard brand? And do you agree	

No.	Question	ADEPT Response
	<p>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.</p> <p>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)</p>	
42	<p>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?</p> <p>A. Yes b. Yes, and I'd like to provide further information c. No (please provide justification)</p>	
43	<p>Do you agree with the proposal to extend Regulation 42 to the installation of mechanical ventilation in existing homes as well as new homes?</p> <p>A. Yes b. Yes, and I'd like to provide further information c. No (please provide justification)</p>	<p>This needs careful consideration as the existing stock will make up the substantive proportion of homes and retro-fitting has to be a key part of any strategy to address energy performance. However, appropriate support and incentives will be essential as this will be a highly cost-effective means of meeting targets, but needs consumer buy-in.</p>
44	<p>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?</p> <p>A. Yes b. Yes, and I'd like to provide further information c. No (please provide justification)</p>	
45	<p>Are you aware of any gaps in our guidance around commissioning heat pumps, or any third-party guidance we could usefully reference?</p> <p>A. Yes (please provide further details) b. No</p>	
46	<p>Do you think the guidance for commissioning on-site electrical storage systems in Section</p>	

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No.	Question	ADEPT Response
	<p>8 of draft Approved Document L, Volume 1: Dwellings is sufficient to ensure they are commissioned correctly?</p> <p>A. Yes b. Yes, and I'd like to provide further information c. No (please provide justification)</p>	
47	<p>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?</p> <p>A. Yes b. Yes, and I'd like to provide further information c. No (please provide justification)</p>	
48	<p>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?</p> <p>A. Yes b. Yes, and I'd like to provide further information c. No (please provide justification)</p>	
49	<p>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.</p> <p>A. Yes (please provide further details) b. No (please provide further details)</p>	
50	<p>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.</p> <p>A. Yes, (please provide further details) b. No</p>	<p>A. Yes.</p> <p>Home User Guides will be increasingly important both from an energy performance optimisation perspective but also in reducing energy bills for consumers.</p>
51	<p>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.</p> <p>A. Yes (please provide justification) b. No (please provide justification)</p>	

No.	Question	ADEPT Response
52	<p>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?</p> <p>A. Yes b. Yes, and I'd like to provide further information c. No (please provide justification)</p>	
9. Heat networks		
53	<p>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?</p> <p>A. Yes b. Yes, and I'd like to provide further information c. No (please provide justification)</p>	<p>B. Yes.</p> <p>It will important for a clear and evidenced approach to validating such networks, as well as dealing with future changes in the supplier.</p>
54	<p>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?</p> <p>A. Yes b. Yes, and I'd like to provide further information c. No (please provide justification)</p>	<p>ADEPT is aware of concerns that the sleeving methodology is considered not to be sufficiently robust. It therefore should be evidenced and validated that the source of energy is from a low carbon source.</p>
55	<p>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?</p> <p>A. Yes b. Yes, and I'd like to provide further information c. No (please provide justification)</p>	<p>ADEPT is aware of concerns that the sleeving methodology is considered not to be sufficiently robust. It therefore should be evidenced and validated that the source of energy is from a low carbon source.</p>
56	<p>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?</p> <p>A. Yes b. No (please provide further details regarding how this unused higher carbon</p>	<p>a. Yes.</p> <p>If the future homes and building standard is presenting itself as low carbon and fossil fuel free than heat networks should not have the capacity to be high carbon and use fossil fuels.</p>

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No.	Question	ADEPT Response
	capacity should be accounted for)	
57	What are your views on how to ensure low-carbon heat is used in practice?	
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?	
10. Smart meters		
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.	a. Yes
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?	b. No. Government should make smart meters mandatory so that users may understand and effectively manage their energy use
11. Accounting for exceptional circumstances		
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)	B. No ADEPT considers that it is important for the proposed Future Homes Standard to establish minimum standards nationally. There is a risk that relaxation could encourage 'gaming' of the standards to try to demonstrate that the standards are unreasonable. It would also need to be understood if such relaxations could disproportionately affect lower income households/areas.
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	
63	Do you think that local authorities should be required to submit the applications they receive, the decisions they make and their	b. Yes, but if this is the case then government should aid local authorities and provide necessary training /financial

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No.	Question	ADEPT Response
	reasoning if requested? A. Yes b. Yes, and I'd like to provide further information c. No (please provide justification)	support to facilitate this.
64	Are there any additional safeguards you think should be put in place to ensure consistent and proportionate use of this power?	
12. Legislative changes to the energy efficiency requirements		
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)	a. Yes
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)	ADEPT would be concerned if removal of regs 25A and 25B would diminish the ability to secure optimum energy performance. This needs to be considered carefully subject to other consultation responses and subsequent changes to FHS. The version of FHS and FBS will not deliver homes that 'do not require future retrofit' and will not deliver net-zero buildings. The only decarbonization benefits arising from implementing the FHS and FBS rely upon electricity from the grid, and the government is increasingly under-performing in delivering that at the required speed.
13. A review of our approach to setting standards		
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)	A. Yes. The Home Energy Model represents a significant step forward compared with SAP.
68	Please provide any comments on the parameters in the notional building.	
69	Minimum standards already state that heat pumps should have weather compensation	

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	<p>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?</p> <p>A. Yes b. No</p> <p>Please provide any evidence you have on the unintended consequences that could arise as a result of using local weather in the notional building. If possible, please comment on the impact on the construction industry in terms of design and building feasibility. We also welcome views on whether weather compensation is sufficient to ensure heat pump efficiency</p>	
70	<p>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?</p> <p>A. Yes b. No</p>	
71	<p>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?</p> <p>A. Yes b. No</p> <p>Please provide any further evidence.</p>	
72	<p>Do you agree with the proposed approach to determine U-values of windows and doors in new dwellings?</p> <p>A. Yes b. No</p> <p>Please provide any further evidence.</p>	
73	<p>Do you agree with the proposal to remove the default ψ-value for assessing thermal bridges in new dwellings?</p> <p>A. Yes b. Yes, and I'd like to provide further information c. No (please provide justification)</p>	
74	<p>Do you have any information you would like to provide on the homes built to the Future Homes Standard using curtain walling?</p>	
75	<p>Do you agree with the methodology outlined in the NCM modelling guide for the Future Buildings Standard?</p>	

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No.	Question	ADEPT Response
	A. Yes, b. No (please provide justification)	
76	Please provide any further comments on the csbem tool which demonstrates an implementation of the NCM methodology	
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.	
14 transitional arrangements		
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.	ADEPT would in principle support Option 1, but recognises that this will be dependent upon there being sufficient lead-in time for developers, construction industry, suppliers and building control inspectors. The shortest period possible, as this will reduce the number of building constructed using fossil fuel boilers, and to a standard that will not require future retrofit.
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	
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)	a. Yes
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?	
15 Part O – Call for Evidence		
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	A. Yes but note special provisions will be needed for listed buildings/ heritage assets.

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No.	Question	ADEPT Response
	<p>(please list from reg 5a-k or describe the type)</p> <p>c. No</p> <p>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</p>	<p>Any building being used as a dwelling needs to be subject to the same high standards to protect occupiers and users from being exposed to potentially dangerous levels of overheating. Again, it might be necessary for the government to make funding available if costs of changes of use increase too much due to Part O regulations applying. By doing so government will help to upskill the construction workforce and encourage innovative design solutions which will help to improve build quality going forward.</p>
83	<p>Apart from material change of use, is there anything missing from the current scope of Part O?</p> <p>A. Yes, (please provide justification)</p> <p>b. No, (please provide justification)</p>	
84	<p>Can you provide evidence on how the addition of extensions or conservatories to domestic buildings can impact overheating risk on an existing building?</p> <p>A. Yes, (please provide justification)</p> <p>b. No</p>	
85	<p>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?</p> <p>A. Yes (please provide justification)</p> <p>b. No</p>	
86	<p>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?</p> <p>A. Yes, (please provide justification)</p> <p>b. No</p>	
87	<p>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?</p> <p>A. Yes, (please provide justification)</p> <p>b. No</p>	

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No.	Question	ADEPT Response
88	<p>Do you consider there to be omissions or issues concerning the statutory guidance on protection from falling?</p> <p>A. Yes, (please provide justification)</p> <p>b. No</p>	
89	<p>Are you aware of ways that Approved Document O could be improved, particularly for smaller housebuilders?</p> <p>A. Yes, (please provide justification)</p> <p>b. No</p>	
90	<p>Does Regulation 40B require revision?</p> <p>A. Yes, (please provide justification)</p> <p>b. No</p>	
91	<p>Do you consider there to be omissions or issues concerning the statutory guidance on providing information?</p> <p>A. Yes, (please provide justification)</p> <p>b. No</p>	
92	<p>Are there any improvements that you recommend making to the information provided about overheating in the Home User Guide template?</p> <p>A. Yes, (please provide justification)</p> <p>b. No</p>	
93	<p>Are there any omissions or issues not covered above with the statutory guidance in Approved Document O that we should be aware of?</p> <p>A. Yes</p> <p>b. No</p> <p>If you answered yes, please provide more details including suggestions on ways to improve the statutory guidance and point to existing evidence/examples that demonstrates why the gaps or issues you have identified should be reviewed as a priority.</p>	
16 Equalities Impact Assessment		
94	<p>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.</p>	
95	<p>Please provide any feedback you have on the impact assessments</p>	