

Planning

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By Email To: FutureBuildingsStandardConsultation@communities.gov.uk

Thank you for providing us with the opportunity to comment on the proposals for The Future Buildings Standard.

This email response to the consultation is submitted on behalf of South Oxfordshire and Vale of The White Horse District Councils (South and Vale). The Councils have chosen to submit comments by email and our responses follow the survey chapters outlined in the consultation.

Chapter 2: The Future Buildings Standard

Question 1): Our aim is that buildings constructed to the Future Buildings Standard will be capable of becoming carbon neutral over time as the electricity grid and heat networks decarbonise. Do you agree that the outline of the Future Buildings Standard in this chapter meets this aim?

Yes, we agree that the outline of the Future Buildings Standard in chapter 2 will meet the aim that buildings constructed to the Future Building Standard will be capable of becoming carbon neutral over time providing; -

- The electricity grid and heat networks decarbonise as anticipated
- There is adequate investment in providing low carbon heating technologies including the creation of a workforce of well-trained installers that can support demand
- The performance gap from poor building work and commissioning is addressed and monitored
- There is better education and training for construction workers in general, so they understand the importance of the Future Buildings Standard and everything this encompasses
- The information provided to occupants of buildings is actually provided in an easy to understand format, so they can understand the importance of how to operate and maintain the buildings they occupy in the manner they have been designed.

Question 2): We believe that developers will typically deploy heat pumps and heat networks to deliver the low carbon heating requirement of the Future Buildings Standard where practical. What are your views on this and in what circumstances should other low carbon technologies, such as direct electric heating or hydrogen, be used?

We are experiencing a significant proportion of developers deploy heat pumps combined with photovoltaic panels as part of the design to achieve improved energy efficiency standards within new dwellings. No heat networks have been proposed.

In our opinion, the decision to incorporate heat pumps would appear to be based on the designer taking the simplest route to demonstrate compliance with legislation and what is referred to within this consultation as a 'design-for-compliance' approach.

Our understanding is that direct electric heating is expensive to run and could lead to social inequalities where some people in society wouldn't be able to afford to heat their homes.

As we understand it there are benefits to hydrogen as a low carbon heating but that this is not readily available at this time. We await to see how this progresses in the future and in time for The Future Homes Standard implementation 2025.

Question 3): Do you agree that some non-domestic building types are more suitable for low carbon heating and hot water, and that some non-domestic building types are more challenging?

We have no specific opinion but from the information presented it would appear that yes, some non-domestic building types are more suitable for low carbon heating and hot water, and that some non-domestic building types are more challenging.

Question 4): Do you agree with the allocation of building types to space and water heating demand types, as presented in Table 2.1 of this consultation document?

No comments.

Question 5): We would like to introduce the Future Buildings Standard for all buildings as quickly as possible. When do you think the Future Buildings Standard should introduce low carbon space heating for buildings with Type 1 or Type 2 demand (buildings that have space heating demand more suitable for heat pumps)?

We would like to see the introduction of The Future Buildings Standard for all buildings as quickly as possible particularly as both Councils declared a climate change emergency in 2019 and have ambitious commitments to becoming carbon neutral;

South Oxfordshire District Council within its own operations by 2025 and becoming a carbon neutral district by 2030 and Vale of White Horse District Council aspiring to become carbon neutral by 2030 and a carbon neutral district by 2045.

This will mean radical steps and far-reaching policy and behavioural changes for everyone living in the area and we would like to see Government adopt such an approach.

Question 6): We would like to introduce the Future Buildings Standard for all buildings as quickly as possible. When do you think the Future Buildings Standard should introduce low carbon space heating for buildings with Type 3 demand (buildings that have space heating demand less suitable for heat pumps)?

See response to Question 5.

Question 7): We would like to introduce the Future Buildings Standard for all buildings as quickly as possible. When do you think the Future Buildings Standard should introduce low carbon water heating for buildings with Type 1 or Type 3 demand (buildings that have water heating demand more suitable for point-of-use heaters or heat pumps)?

See response to Question 5.

Question 8): We would like to introduce the Future Buildings Standard for all buildings as quickly as possible. When do you think the Future Buildings Standard should introduce low carbon water heating for buildings with Type 2 demand (buildings that have water heating demand less suitable for point-of-use heaters or heat pumps)?

See response to Question 5.

Chapter 3: Interim uplift to Part L standards for non-domestic buildings

Question 9): We would welcome any further suggestions, beyond those provided in this consultation, for improving the modelling process; Part L and Part F compliance; and the actual energy performance of non-domestic buildings. Please provide related evidence.

No comments.

Question 10): What level of uplift to the energy efficiency standards for non-domestic buildings in the Building Regulations should be introduced in 2021?

We support Option 2 – average 27% CO₂ reduction although we would encourage Government to consider adopting a higher uplift particularly as both Councils have declared a Climate Change Emergency in 2019.

To demonstrate that a higher uplift can be achieved South Oxfordshire District Council have introduced a local planning policy requiring any new building subject the requirements of The Building Regulations and over 1,000m² to achieve a minimum uplift of 40% over a Part L 2013 compliance design. Whilst this policy is still in its infancy, developers are willing putting forward designs to achieve a minimum 40% uplift along with BREEAM excellence. This provides evidence that designers are prepared to design so higher standards can be achieved.

Question 11): Do you agree with the way that we are proposing to apply primary energy as the principal performance metric?

We consider that the approach taken in the recent response to the first consultation on The Future Homes Standard issued on the 27 January 2021 should be adopted. For example, the energy performance of a building should be based on a combination of the primary energy target, CO₂ emission target and minimum standards for fabric and fixed building services.

Question 12): Do you agree with using CO₂ as the secondary performance metric?

See response to Question 11.

Question 13): Do you agree with the approach to calculating CO₂ and primary energy factors, referred to in paragraph 3.5.7 of this consultation document?

See response to Question 11.

Question 14) Do you agree with the proposals for natural gas being assigned as the heating fuel for any fuels with a worse CO₂ emission factor than natural gas?

We welcome any changes that would provide more accurate calculation of the energy use of a building which in turn leads to more energy efficient buildings.

Question 15): Do you agree with our proposal of using a hybrid electric/heat pump heating system in the notional building when electricity is specified as a heating fuel?

See response to Question 14.

Question 16): Do you agree with the proposal for the treatment of domestic hot water in the notional building?

See response to Question 14.

Question 17): Do you agree with the proposal for connecting to an existing heat network, as presented in the draft NCM modelling guide?

See response to Question 14.

Question 18): Do you agree with the proposal for connecting to a new heat network, as presented in the draft NCM modelling guide?

See response to Question 14.

Question 19): Do you agree with the proposed changes to the National Calculation Methodology Modelling Guide and activity database?

We welcome any changes to the outputs of calculation tools that would provide better information to building control bodies and building owners, particularly if this would make checking the characteristics of the building energy model against the actual construction and completed building easily identifiable. For example, a list of building services equipment and fabric specifications.

Question 20): We would welcome any further suggestions for revising the outputs from SBEM, which would enable easier checking by building control on building completion. Please provide related evidence.

No comments.

Question 21): Do you agree with the proposals for limiting heat gains in non-domestic buildings?

We support the principle of reducing limiting heat gains in non-domestic buildings where this improve the comfort of the occupations of the building.

Question 22): Do you agree with the proposed minimum standards for fabric performance in new non-domestic buildings as presented in Table 3.2 of this consultation document?

Yes.

Question 23): Do you agree with the proposed minimum standards for fabric performance of new thermal elements in existing non-domestic buildings as presented in Table 3.3 of this consultation document?

Yes.

Question 24): Do you agree with the draft guidance in paragraph 4.15 of the draft Approved Document L, volume 2: buildings other than dwellings on reducing unwanted air infiltration when carrying out work to existing non-domestic buildings?

Yes.

Question 25): Do you agree that the limiting U-value for rooflights in new and existing non-domestic buildings should be based on a rooflight in a horizontal position, as detailed in paragraph 4.4 of draft Approved Document L, volume 2: buildings other than dwellings?

Yes, if this reduces the need for conversion factors so in turn reduces unnecessary complexity.

46 Question 26): Do you agree that we should adopt the latest version of BR 443 for calculating U-values in new and existing non-domestic buildings, as detailed in paragraph 4.1 of draft Approved Document L, volume 2: buildings other than dwellings?

No comments.

Question 27): Do you agree with the newly proposed minimum efficiencies for natural gas, oil and LPG boiler and domestic hot water system installations in new non-domestic buildings in Section 6 of draft Approved Document L, volume 2: buildings other than dwellings?

Yes, we support proposals and measures that will improve the energy efficiency of building services.

Question 28): Do you agree with the proposed set of standards for air distribution systems for new non-domestic buildings in Section 6 of draft Approved Document L, volume 2: buildings other than dwellings?

See response to Question 27.

Question 29): Do you agree with the proposals for self-regulating devices for new non-domestic buildings, as set out in Sections 5 and 6 of draft Approved Document L, volume 2: buildings other than dwellings?

See response to Question 27.

Question 30): Do you agree with the minimum efficacy proposals for lighting in new non-domestic buildings in Section 6 of draft Approved Document L, volume 2: buildings other than dwellings?

See response to Question 27.

Question 31): Do you agree with the proposals for cooling in new non-domestic buildings in Section 6 of draft Approved Document L, volume 2: buildings other than dwellings?

See response to Question 27.

Question 32): Do you agree with the proposals to require building automation and control systems in new non-domestic buildings, when such buildings have a heating or air-conditioning system over 290kW?

See response to Question 27.

Question 33): Do you agree with the technical specification for new building automation and control systems as EN 15232, Class A?

No comments.

Question 34): Do you agree with the proposals for improving the commissioning guidance for new non-domestic buildings in Section 8 and 9 of draft Approved Document L, volume 2: buildings other than dwellings?

Yes.

Question 35): Do you agree with the proposals for requirements relating to the assessment of overall energy performance of building services installations and providing information to building owners for new non-domestic buildings given in sections 8 and 9 of Approved Document L, volume 2: buildings other than dwellings?

Yes.

Question 36): Do you agree with the guidance proposals for adequate sizing and controls of building services systems in new non-domestic buildings, as detailed in Sections 5 and 6 of draft Approved Document L, volume 2: buildings other than dwellings?

See response to Question 27.

Question 37): Do you agree with the proposal that wet space heating systems in new buildings should be designed to operate with a flow temperature of 55°C or lower?

No comments.

Question 38): Do you agree with the proposals to clarify, rationalise and simplify the guidance for building services in new non-domestic buildings, and to incorporate the standards of the Non-Domestic Building Services guidance into the main body of the Approved Document L, volume 2: buildings other than dwellings?

Yes.

Question 39): Do you agree with the proposals to simplify the requirements in the Building Regulations for the consideration of high-efficiency alternative systems in new non-domestic buildings?

Yes.

Question 40): Do you agree with the proposals for replacement of fixed building services in existing non-domestic buildings as detailed in paragraphs 5.4 to 5.7 of draft Approved Document L, volume 2: buildings other than dwellings?

Yes.

Question 41): Do you agree with the newly proposed minimum efficiencies for natural gas, oil and LPG boiler and domestic hot water system installations in existing non-domestic buildings in Section 6 of draft Approved Document L, volume 2: buildings other than dwellings?

See response to Question 27.

Question 42): Should minimum boiler efficiency standards in existing non-domestic buildings still benefit from relaxations through the use of heating efficiency credits?

No. Any opportunities to improve our existing buildings should be capitalised to ensure that as much as possible is done to make our existing buildings more energy efficient.

Question 43): Do you agree with the proposed set of standards for air distribution systems for existing non-domestic buildings in Section 6 of draft Approved Document L, volume 2: buildings other than dwellings?

See response to Question 27.

Question 44): Do you agree with our proposed approach and guidance to mandating self-regulating controls in existing non-domestic buildings, including technical and functional feasibility, as detailed in Sections 5 and 6 of draft Approved Document L, volume 2: buildings other than dwellings?

See response to Question 27.

Question 45): Do you agree with the minimum efficacy proposals for lighting in existing non-domestic buildings in Section 6 of draft Approved Document L, volume 2: buildings other than dwellings?

See response to Question 27.

Question 46): Do you agree with the proposals for cooling in existing non-domestic buildings in Section 6 of draft Approved Document L, volume 2: buildings other than dwellings?

See response to Question 27.

Question 47): Do you agree with the proposals that when Building Automation and Control System is installed in an existing non-domestic building with a heating or air-conditioning system over 290 kW, it should meet the same minimum standards as new non-domestic buildings?

Yes, because we consider the standards between new and existing non-standards buildings need simplifying. This will also lead to the energy efficiency of existing buildings being more comparable to new build standards.

Question 48): Do you agree with the proposals for requirements relating to the assessment of overall energy performance of building services installations and providing information to building owners for existing non-domestic buildings?

Yes.

Question 49): Do you agree with the guidance proposals for adequate sizing and controls of building services systems in existing non-domestic buildings, as detailed in Sections 5 and 6 of draft Approved Document L, volume 2: buildings other than dwellings?

See response to Question 27.

Question 50): Do you agree with the proposal that when whole wet space heating systems (i.e., boiler and radiators) are replaced in existing non-domestic buildings the replacement system should be designed to operate with a flow temperature of 55°C or lower?

We support the proposal that when whole wet space heating systems (i.e., boiler and radiators) are replaced in existing non-domestic buildings the replacement system should be improved to match design requirements for new non-domestic building. We do not however have a specific opinion on whether this should be a system designed to operate with a flow temperature of 55°C or lower or how this should be achieved.

Question 51): Do you agree with the proposals to restructure the guidance for building services in existing non-domestic buildings, and to incorporate the standards of the Non-Domestic Building Services guidance into the main body of the Approved Document L, volume 2: buildings other than dwellings?

Yes.

Question 52): Do you agree the Government should continue to provide guidance for minimum building services efficiencies in existing non-domestic buildings, if the standard does not go significantly further than the Ecodesign regulations?

Yes.

Question 53): Do you agree with the changes made to simplify, rationalise and clarify the guidance, and the updates to external references in Appendix E and Appendix F, in Approved Document L, volume 2: buildings other than dwellings, as outlined in paragraph 3.12.1 of the consultation document?

In general, we support the changes to simplify, rationalise and clarify the guidance albeit the items being “removed” are useful guidance in some situations.

Question 54): Do you agree that the measures in Tables D.1 and D.2 of Appendix D of Approved Document L, volume 2: buildings other than dwellings are likely to be technically, functionally and economically feasible under normal circumstances?

Yes.

Question 55): Do you agree with the proposals for relaxation factors for modular and portable buildings, as detailed in Tables 2.2 and 2.3 of draft Approved Document L, volume 2: buildings other than dwellings?

We do not have an opinion on the specific proposals for relaxation factors mentioned above but we do support the principle of introducing new measures that will improve the energy efficiency of the building services and lead to more energy efficient modular and portable buildings.

Question 56): Do you think that the Pulse methodology should be an approved means of demonstrating airtightness for non-domestic buildings?

We do not have an opinion on the Pulse methodology being used as an approved means of demonstrating airtightness for non-domestic buildings, but we do support industry being given the options to choose accepted methods to demonstrate compliance with The Regulations.

Question 57): Do you agree that we should adopt an independent approved airtightness testing methodology such as the CIBSE draft methodology for non-domestic buildings?

We support the adoption of an independent approved airtightness testing methodology for non-domestic buildings although we have no opinion if the CIBSE draft methodology is the most suitable. We however acknowledge that CIBSE is a recognised specialist within industry.

Question 58): Do you agree with the proposal for guidance on the calibration of devices that carry out airtightness testing in new and existing non-domestic buildings?

No comments.

Question 59): Do you agree with the proposed approach to energy sub-metering, as detailed in Section 5 of draft Approved Document L, volume 2: buildings other than dwellings?

We do not have an opinion on the proposed approach to energy sub-metering however, we do support the principle of any new measures that will improve the energy efficiency of the building services.

Question 60): Do you agree with the proposed approach to energy forecasting, as detailed in paragraph 9.4 of draft Approved Document L, volume 2: buildings other than dwellings?

Yes, we consider providing building owners with a forecast of the actual energy use of the building and broken down by fuel type with estimates provided for monthly intervals would be very useful to monitor energy efficiency.

Question 61): Do you agree with the proposals for transitional arrangements for buildings other than dwellings?

Yes.

Chapter 4: Interim Uplift to Part F standards for non-domestic buildings

Question 62): Do you agree with the proposed guidance in Section 1 and Section 2 of Approved Document F, volume 2: buildings other than dwellings on minimising the ingress of external pollutants and on the proper installation of ventilation systems in non-domestic buildings?

Yes.

Question 63): Do you agree with the proposed guidance for reducing noise nuisance for ventilation systems in non-domestic buildings?

Yes.

Question 64): Do you agree with the additional guidance provided in paragraphs 1.18 to 1.26 of the draft Approved Document F, volume 2: buildings other than dwellings on the installation of ventilation systems?

Yes.

Question 65): Do you agree that the guidance in Appendix B of the draft Approved Document F, volume 2: buildings other than dwellings provides an appropriate basis for setting minimum ventilation standards?

No comments.

Question 66): Do you agree with the list of industry guidance presented in Section 1 of draft Approved Document F, volume 2: buildings other than dwellings?

No comments.

Question 67): Do you agree with the list of references to industry guidance presented in Appendix C and Appendix D in the draft Approved Document F, volume 2: buildings other than dwellings?

Yes, we support Government continuing to provide this list of guidance.

Question 68): Do you agree with the proposals to simplify, rationalise and clarify the Approved Document guidance in Approved Document F, volume 2: buildings other than dwellings as outlined in paragraph 4.3.7 of the consultation document?

Yes.

Question 69): Do you agree that purge ventilation in offices should be designed to provide at least four air changes per hour?

We do not have an opinion on the specific design of purge ventilation in offices, but we do support the principle of providing decent indoor air quality and supply to persons working in an office environment.

Question 70): Do you agree with the guidance for the ventilation of car parks and offices, as detailed in Section 1 of Approved Document F, volume 2: buildings other than dwellings?

We do not have an opinion on the specific guidance for the ventilation of car parks and offices, but we do support the principle of ensuring decent quality air supply in these situations.

Question 71): Do you agree with the proposals in Section 3 of draft Approved Document F, volume 2: buildings other than dwellings, when replacing an existing window with no background ventilators?

We support measures that would either improve indoor air quality or ensure that adequate indoor air quality is maintained when replacing existing windows with no background ventilators.

Question 72): Do you agree with the proposal to provide a completed commissioning sheet to the building owner and associated guidance in Section 4 of draft Approved Document F, volume 2: buildings other than dwellings?

Yes, in particular that the information is provided in a clear manner, for a non-technical audience.

Question 73): Do you agree with requiring increased capacity of 50% within new ventilation systems in offices shown in paragraph 1.38 of the draft Approved Document F, volume 2: buildings other than dwellings?

We do not have an opinion on requiring increased capacity within new ventilation systems in offices but we do support ensuring that persons working in an office environment have a decent quality indoor air supply.

Question 74): Do you agree with the proposed standards for provision of outdoor air for offices, shown in paragraphs 1.35 to 1.36 of draft Approved Document F, volume 2: buildings other than dwellings?

We welcome improved methods of ensuring the indoor air quality for occupants working within offices (and the common spaces).

Question 75): Do you agree that extract ventilation in bathrooms, WCs, and other sanitary accommodation should be capable of operating in a continuous mode if necessary?

Yes.

Question 76): Do you agree with the proposal for indoor air quality monitoring in offices as outlined in paragraphs 1.39 to 1.41 of draft Approved Document F, volume 2: buildings other than dwellings?

Yes.

Question 77): If applicable, please provide any suggestions for guidance for indoor air quality monitoring (e.g., CO2 monitoring) in non-domestic buildings.

No suggestions.

Question 78): Do you agree with the proposals for systems that recirculate air as outlined in paragraph 1.46 of draft Approved Document F, volume 2: buildings other than dwellings?

We do not have an opinion on the proposals for systems that recirculate air, but we do support any principle which ensures good quality indoor air for building occupants.

Question 79): Do you agree with the proposed minimum ventilation standard in occupiable rooms in all types of non-domestic buildings where singing, loud speech or aerobic exercise may take place, where low temperature and low humidity environments may exist, or where members of the public may gather in large groups? These are outlined in paragraphs 1.27 and 1.28 of draft Approved Document F, volume 2: buildings other than dwellings.

We do not have an opinion on the proposed minimum ventilation standards mentioned above but we do support providing good indoor air quality so building occupants can maximise their enjoyment of any given space and/ or activity and aren't subjected to an unhealthy environment.

Question 80): Do you think the mitigating measures to protect against infection via aerosols would be suitable for any non-domestic buildings other than those stated in the Approved Document guidance?

We do not have an opinion on the mitigating measures mentioned above but we would support measures that protect against infection.

Chapter 5: Standards for overheating in new residential buildings in 2021

Question 81): How should the Government address the overheating risk?

In our opinion it is too late to address overheating in the design of a building at construction stage when a building control application is submitted. Overheating needs to be addressed at the initial design stage such as planning stage, so any failures are corrected before works starts onsite.

Failure to adopt early intervention may result in buildings being built without due consideration of overheating and it could be difficult for Building Control Bodies to address these failures in a timely

manner because they currently have no powers to stop works where they see a failure in the design and the enforcement procedures available to them can be ineffective because they take too long to action.

We also note that as part of the completion process (draft AD X) the building control body must “sign off” that the building has been built consistent with the details provided in Part 1 and 2 of the checklists. Building Control Bodies (BCB’s) are not responsible for the building works and this responsibility for confirming if the building has been built in accordance with the design must remain with the builder/ person undertaking the building work.

BCB’s issue a completion certificate at the end of a development to confirm the building works have been inspected and as far as the BCB have been able to ascertain, the requirements of the Building Regulations have been met. There should be no requirement for BCB’s to sign off on various elements of the design or construction. If BCB’s are to be required to sign off to confirm that the building been built consistent with the details provided in the checklist it could leave BCB’s liable to insurance claims against them if the building overheats at any time in the future.

Question 82): Do you agree with the buildings that are in scope of this new part of the Building Regulations?

We consider that they should be expanded to include all buildings where people sleep.

Question 83): Do you agree that the division of England based on overheating risk detailed in paragraph 5.6.3 of this consultation document is correct?

No, there should be more areas.

We have no evidence, but it would seem reasonable to assume that many other parts of the country, particularly in the North of the England are likely to suffer less overheating than in the South for example. It seems unreasonable that these areas are being categorised the same as areas that are more likely to suffer with overheating and as a consequence they may have to adhere to the same standards when they are less likely to be affected.

Question 84): Do you agree with the categorisation of buildings into Group A and Group B as detailed in paragraph 5.6.5 of this consultation document?

We have no opinion but would expect Government to take advice from a cross section of industry experts to make the best assessment on this regard.

Question 85): Do you agree with the simplified method as a means of compliance with the proposed new requirement to reduce overheating risk?

See response to Question 84.

Question 86): Do you agree with the maximum glazing area and shading standards for limiting solar gains in the simplified method as detailed in paragraphs 1.6 to 1.9 of the draft Overheating Approved Document?

See response to Question 84.

Question 87) Do you agree with the approach to removing excess heat in the simplified method as detailed in paragraphs 1.10 to 1.13 of the draft Overheating Approved Document?

See response to Question 84.

Question 88): Do you think that adequate levels of daylight will be provided and that homes will be acceptable to purchasers while meeting these proposed standards?

The proposed model home would appear to provide adequate levels of daylight. We do however acknowledge that there are many factors that attract individuals to purchase a property including adequate levels of daylight. We would suggest that market research is carried out targeted at new homeowners to understand what attracted them to their new homes and/ or if the proposals detailed within the consultation would have affected their decision to purchase a property.

Question 89): Do you agree with offering dynamic thermal analysis as a means of compliance with the proposed new requirement to reduce overheating risk?

We agree that alternative acceptable and agreed approaches is important for designers, so they have choice about how do demonstrate compliance. We do not however have an opinion on the dynamic thermal analysis as a means of compliance or that as described in the Approved Document.

Question 90): Please detail any information you have about the likelihood of occupants opening doors and windows at night in unoccupied rooms.

No comments.

Question 91): Do you agree with the proposed acceptable strategies for shading and the removal of excess heat, when following the dynamic thermal analysis method, as found in Section 2 of the draft Overheating Approved Document?

The strategies for shading seem reasonable and we would agree that not including blinds and trees is a much more sensible approach to achieve permanent shading.

Question 92): Do you agree that the overheating standard should not account for the effect of curtains, blinds and tree cover?

See response to Question 91.

Question 93): Do you agree that the building should be constructed to meet the overheating requirement without the need for mechanical cooling?

Yes.

Question 94): Do you agree with limiting noise in new residential buildings when the overheating strategy is in use, and the proposed guidance in Section 3 of the draft Overheating Approved Document?

Yes, albeit we would want clarification that the documentation to demonstrate that the local planning authority have considered external noise demonstrates that the minimum standards detailed within the new Approved Document would be achieved.

Question 95): Do you agree with minimising the ingress of external pollutants when the overheating strategy is in use, and that the external pollutants guidance in Approved Document F, volume 1: dwellings should be followed where practicable?

Yes. It is important that were a new requirement is introduced to mitigate one problem it doesn't create another problem which may adversely affect the indoor comfort of the occupier of the building in another way.

Question 96): Do you agree with the proposals on security in Section 3 of the draft Overheating Approved Document in new residential buildings?

Yes, although the requirement of fitting louvres or railings may not become evident until the construction phase (when a building control application is submitted – see response to question 81). Where this becomes required to comply with Building Regulations it could create a conflict with the planning permission granted.

Question 97): Do you agree with the protection from falling guidance proposed in Section 3 of the draft Overheating Approved Document?

Yes, they seem reasonable measures to prevent accident.

Question 98): Do you agree with the guidance on protection from entrapment proposed in Section 3 of the draft Overheating Approved Document?

See response to Question 97.

Question 99): Are there any further issues which affect usability that should be included in the Overheating Approved Document?

No comments.

Question 100): Do you agree with the proposed requirement to provide information on the overheating strategy to the building owner?

Yes, we agree that providing the building owner with information concerning how to make the most effective use of the way the building is designed and constructed is essential.

Question 101): How do you see this new Building Regulation interacting with policies in local plans?

See response to Questions 81 and 96.

Question 102): Do you agree that this guidance on limiting the effects of heat gains in summer, in both Approved Document L guidance for new dwellings and SAP Appendix P, can be removed?

Yes, as it is our understanding that the overheating tool in SAP is not as effective as it should be at stopping overheating in new buildings at present.

Question 103): Should the transitional arrangements that apply to the overheating requirements align with the proposed transitional arrangements for Part L and F 2021 for new dwellings, as described in paragraph 5.10.2 of this consultation document?

Yes.

Chapter 6: Part L standards for domestic buildings in 2021

Question 104): Do you agree with the proposed minimum fabric standards for existing domestic buildings set out in Table 6.1 of this consultation document?

Yes.

Question 105): Do you agree with the draft guidance in section 4 of the draft Approved Document L, volume 1: dwellings on reducing unwanted air infiltration when carrying out work to existing homes?

We support the recommendations; however they all rely on builders being conversant with the requirements of The Building Regulations and adopting good working practices. This is all too often not the reality.

There either needs to be a more rigorous inspection regime to check more of the building works being carried out is to the required standard or, an alternative solution offered to builders/ developers for example air testing upon completion. The former could only be implemented if there is more investment in resources within building control, so there are more Inspectors available to carry out the additional site inspections that would be necessary.

Question 106): Do you agree that we should control the primary energy and fabric energy efficiency of new extensions to existing homes when using the SAP method of compliance?

Yes, if this brings the design for existing buildings using SAP to demonstrate compliance more in line with the changes to new dwellings being implemented as part of the 2021 uplift to Part L.

Question 107): Do you agree that the limiting U-value for rooflights in existing domestic buildings should be based on a rooflight in a horizontal position, as detailed in Section 4 of draft Approved Document L, volume 1: dwellings?

Yes, if this reduces the need for conversion factors so in turn reduces unnecessary complexity.

Question 107): Do you agree that the limiting U-value for rooflights in existing domestic buildings should be based on a rooflight in a horizontal position, as detailed in Section 4 of draft Approved Document L, volume 1: dwellings?

See response to Question 107.

Question 108): Do you agree that we should adopt the latest version of BR 443 for calculating U-values in existing domestic buildings, as detailed in Section 4 of draft Approved Document L, volume 1: dwellings?

No comment.

Question 109): Do you agree with the proposed minimum fabric standards set out in Table 6.2 of this consultation document, and Sections 4 and 11 of draft Approved Document L, volume 1: dwellings?

No. In our experience builders already struggle to achieve the current minimum standards where renovation works to flat roofs and pitch roofs are undertaken. This is due to a number of constraints for example; existing headroom within the building, depth of existing structural elements, external heights and/ or abutting roofs structures. Increasing the values would only exacerbate this issue and/ or require Building Control Bodies to more regularly relax regulations even further.

Question 110): What level of FEES should be used for Part L 2021?

Option 1, full fabric specification. We are finding that many new homes developers are already building to higher standards than are set by current Building Regulations. This would encourage those who aren't to do so.

Question 111): Do you agree that we have adequately covered matters which are currently in the Domestic Building Services Compliance Guide in draft Approved Document L, volume 1: dwellings for existing homes?

Yes.

Question 112): Do you agree with the proposed minimum standards for building services in existing homes, as detailed in Sections 5 and 6 of draft Approved Document L, volume 1: dwellings

We do not have an opinion on the specific proposals, but we do support the principle of introducing new measures that will improve the energy efficiency of the building services.

Question 113): Do you agree with the proposals for replacement fixed building services in existing homes, as detailed in Section 5 of draft Approved Document L, volume 1: dwellings?

Yes.

Question 114): Do you agree with our proposed approach to mandating self-regulating controls in existing domestic buildings, including technical and economic feasibility, as detailed in Sections 5 and 6 of draft Approved Document L, volume 1: dwellings?

Yes.

Question 115): Do you agree with the proposed specifications for building automation and control systems installed in a new or existing home, as detailed in Section 6 of draft Approved Document L, volume 1: dwellings?

No comments.

Question 116): Do you agree with the proposals for extending commissioning requirements to Building Automation and Control Systems and on-site electricity generation systems, as detailed in Sections 8 and 9 of draft Approved Document L, volume 1: dwellings?

No Comments.

Question 117): Do you agree with the proposals for requirements relating to the assessment of overall energy performance of building services installations and providing information to homeowners, as detailed in Sections 8 and 9 of draft Approved Document L, volume 1: dwellings?

Yes.

Question 118): Do you agree with the proposed changes to water treatment guidance and removing formal guidance on water softening?

Yes, if this is not relevant to energy efficiency.

Question 119): Do you agree with the guidance proposals for adequate sizing and controls of building services systems in domestic buildings, as detailed in Sections 5 and 6 of draft Approved Document L, volume 1: dwellings?

See response to Question 112.

Question 120): Do you agree with the guidance proposals on sizing a system to run at 55°C when a whole heating system is replaced, as detailed in Section 5 of draft Approved Document L, volume 1: dwellings?

We support the proposal that when whole wet space heating systems (i.e., boiler and radiators) are replaced in domestic buildings the replacement system should be improved to match design requirements for new domestic buildings. We do not however have a specific opinion on whether this should be a system designed to operate with a flow temperature of 55°C or lower or how this should be achieved.

Question 121): Do you agree with the proposed changes to the supplementary guidance and the external references in Appendix D and Appendix E, in the draft Approved Document L, volume 1: dwellings as outlined in paragraph 6.8.2.?

In general, we support the changes to simplify, rationalise and clarify the guidance albeit the items being “removed” are useful guidance in some situations.

Question 122): Do you agree with the proposal for guidance on the calibration of devices that carry out airtightness testing in new and existing domestic buildings?

No comments.

Chapter 7: Part F standards for existing domestic buildings in 2021

Question 123): Do you agree that we have adequately covered matters for existing dwellings which are currently in the Domestic in draft Approved Document F, volume 1: dwellings?

Yes.

Question 124): Do you agree with the proposed changes to supplementary guidance and the external references used in Appendix E and Appendix F, for existing domestic buildings from the draft Approved Document F, volume 1: dwellings?

Yes.

Question 125): Do you agree with the proposal to align the guidance and standards for work to existing homes to that outlined in Chapter 4 of the Government Response to the Future Homes Standard consultation?

Yes.

Question 126): Do you agree with the proposed guidance for installing energy efficiency measures in existing homes, as detailed in Section 3 of draft Approved Document F, volume 1: dwellings.

Yes.

Question 127): Do you agree with the content of the proposed checklist for ventilation provision detailed in Appendix D of draft Approved Document F, volume 1: dwellings?

Yes, but clarification of who would undertake this assessment is required. This shouldn't be the responsibility of the Building Control Body. Additionally, we would expect to see that this assessment is undertaken by a competent person.

Question 128): Do you agree with the guidance in Section 3 of draft Approved Document F, volume 1: dwellings when replacing an existing window with no background ventilators?

Yes.

Question 129): Do you agree with the proposals in paragraphs 3.29 to 3.31 of draft Approved Document F, volume 1: dwellings in 7.4.11 of this consultation document on work to existing kitchens or bathrooms?

Yes.

Question 130): Do you agree with the proposal to provide a completed commissioning sheet to the homeowner, as detailed in Section 4 of draft Approved Document F volume 1: dwellings?

Yes.

We would also welcome clarification concerning who would be expected to undertake the Checklist for ventilation provision in existing dwellings (Appendix D). We would expect this to be the designer not the responsibility of the Building Control Body.

Impact and Equalities Assessment

Question 131): Please provide any feedback you have on the impact assessment there, including the assumptions made and the assessment of the potential costs and benefits of the proposed options we have made.

No feedback.

Question 132): 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. Please provide evidence to support your comments.

No feedback.

