Solar Energy UK

Consultation Response

The Future Homes and Buildings Standards: 2023 consultation

April 2024

About us

Since 1978, Solar Energy UK has worked to promote the benefits of solar energy and to make its adoption easy and profitable for domestic and commercial users. A not-for-profit association, we are funded entirely by our membership, which includes installers, manufacturers, distributors, large-scale developers, investors, and law firms.

Our mission is to empower the UK solar transformation. We are catalysing our members to pave the way for 70GW of solar energy capacity by 2035. We represent solar heat, solar power and energy storage, with a proven track record of securing breakthroughs for all three.

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- Submission date: 27 March 2024

Introduction

We welcome the opportunity to respond to the Department for Levelling Up Housing and Communities' (DLUHC) consultation on the Future Homes and Building Standard. Solar Energy UK strongly supports the overarching goal of the Future Homes and Building Standard which is for all new homes and buildings to be zero-carbon ready in line with the decarbonisation of the electricity grid by 2035.

To meet the UK's legally binding commitment to achieve a net zero economy by 2050 and the Government's 70GW by 2035 target, it will need a near-complete decarbonisation of UK housing stock. In practice this means that all new homes should be built with the highest possible energy efficiency standards. Homes should be net zero ready and fitted with all the necessary low carbon technologies such as solar panels and clean heating options like heat pumps.

The benefits of deploying solar on new builds have been clearly stated by the Department in the consultation itself, but to reiterate solar delivers energy efficient, decarbonised and affordable homes and buildings. DLUHC's consultation shows that the installation of solar could help homeowners of a typical new build home save between £910 and £2,120 a year, thereby helping mitigate the impact of the energy crisis and reducing fuel poverty. To maximise the number of homes which would benefit from such savings, it is vital that DLUHC enforces stringent building regulations which mandate the deployment of solar. For this reason, Solar Energy UK endorses an amended Option 1 of the notional building standard, which is line with the Department's own preferences. This option includes solar panels that cover a roof area equivalent to 40% of the ground floor area of the home but caveated with a consideration for the roof design, and onsite clean heat generation. Having said this, it is vital for net zero that we maximise the deployment of solar on all new homes thus we would welcome any amendments to ensure that it is practical for solar to be accommodated on all homes.

The case for mandating solar is particularly prudent given the significant expected increase in power demand as the UK begins to electrify heat and transportation and the current grid constraints faced by those seeking to install solar on buildings. All homes, including new builds, will need to help meet some of their power and heat demand. We develop this in our response below. Additionally, we ask that special consideration is given when assessing the consultation response due to the bug that we identified with the Home Energy Model. As always, Solar Energy UK would like to state its willingness to follow up with the Department directly.

Section 4: Performance Requirements for new buildings

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

Solar Energy UK is supportive for Option 1 with a caveat that the roof design is taken into consideration. Thus, the Notional Building we advocate for would at least have:

- Solar panels that cover 40% of ground floor area of the home, with consideration for the roof design
- A low-carbon heating system including air-source heat pump, ground-source heat pump, or low-carbon heat network.

The rationale for the inclusion of solar has been well presented by DLUHC, but to echo the Department's position, the solar within Option 1 offers a less carbon intensive home, which is cheaper to run, protects the consumer against the volatility of the traditional energy market and supports the grid. Additionally, there is widespread public and political support for mandatory solar on newbuilds, a You Gov poll commissioned by the MCS Charitable Foundation found that 80% of people and 79% of MPs across the UK supported mandated solar on new builds.

The full notional house specification document references changes in the calculations behind the total panel power in kilowatt-peak (kWp). Whilst the 40% of ground floor area is unchanged from the current building regulations, the conversion factor from area to power has changed. The previous conversion factor (1/6.5) assumed solar PV panels have a power density of 153Wp/m2. The new factor (1/4.5) is a figure of 222Wp/m2. While at first glance the solar PV provision in the specification has not changed, it has in fact increased by 45%.

SEUK believes that this change accurately reflects the way that solar panel power density has increased over time from around 150Wp/m2 in 2015 to around 207Wp/m2 today, with an increase to 220Wp/m2 likely by the time the Future Homes Standard comes into effect.

‘Feasibility’ Concerns from Housebuilders

Members report conversations with housebuilders, in which it has been suggested that if Government pushes for the new conversion factor (4.5) without considering the roof design then the amount of solar would be prohibitive. In their view, option 1 would negatively impact some of their house designs which do not have the roof space to accommodate the amount of solar called for in the notional house specification in Option 1, given some houses will have hipped roofs, dormer windows etc.

A further change is that the notional house specification is to assume south facing panels, whereas the current regulations assume southeast or southwest. This makes compliance difficult. Given the binary nature of the consultation and in anticipation of the housebuilders push back, we would strongly suggest that DLUHC retain the solar provision in Option 1 but:

- Allows an exception for roof designs that simply cannot accommodate this area. Our members working within the new build sector feel that this would be very unlikely to lead to housebuilders building complex roofs as a way to reduce solar provision, as complex roofs are in fact more costly than solar. This could perhaps be provided as a transitional arrangement to allow sites already plotted and with planning consents to be completed.

- Change the notional house specification so that the solar orientation is as per the actual house, or the best elevation of the actual house rather than assuming always south

- Consider going for a specification half way between Option 1 and 2 - retain solar, which is the measure with the highest impact on primary energy and protects residents from increased and volatile energy bills, but to leave out the other additional measures in Option 1. This would give housebuilders design choices to allow them to 'flex' their specification for homes that struggle to accommodate the solar to match the notional house by increasing specification elsewhere.

Whilst we endorse high energy efficiency standards, we also want the regulations to operate within the realms of possibility and not back the housebuilders into a corner where they feel they need to object to option 1. Despite the concerns raised with Option 1, it is imperative to clearly state that we in no way support Option 2 which delivers a home which is far more expensive to run. The consultation states that option 1 reduces energy bills by between £910 and £2,120 compared to ‘an average existing home’, whilst Option 2 only reduces energy bills by £210 to £1,420.

This comparison is bogus - in fact, Option 2 delivers homes which are **more expensive to run than those built to current building regulations,** it would mean an increase of £580 a year, which is nearly doubles the regulated energy bill compared to new homes being built today **1**. If the government chooses Option 2 then this will be the first time ever that a change to the building regulations on the conservation of fuel and energy results in an **increase** to householder's bills compared to the previous regulation

It should be remembered that tens of thousands of new social housing properties each year are also built to the building regulations. Option 2 increases energy bills for these homes too, putting some of society's most vulnerable people at increasing risk of energy poverty.

In addition, it's important to consider how the addition of solar would support the grid, if the department were to go with Option 2 this would result in hundreds of thousands of electrically heated new homes adding further stress to an already constrained grid. The addition of solar would help make certain that electrified heat is produced affordably whilst reducing the need for expensive and complex grid reinforcement works. It is also important to note how the distributed energy model of the future relies on solar. If we want to see Virtual Power Plants and microgrids with smart energy tech, peer to peer, arbitrage etc then we need local generation through solar.

There is also a circularity to the argument that these new homes are 'zero carbon ready' (as soon as the grid is decarbonised) if the houses themselves make the task of decarbonising the grid that much harder. Option 2 fails on the measure of reducing operational carbon emissions as well.

It is critical within the context of a cost-of-living and climate crisis that homes are built with affordability and sustainability in mind, which makes Option 1 the clear winner for the consumer and the country.

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

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

1 the solarblogger: The Future Homes Standard Consultation

Solar Energy UK views delivering lower bills and carbon savings as the main priorities of the standard. If the UK is to meet its legally binding net zero target it is vital that we decarbonise our housing stock affordably. Any energy efficiency measures must simultaneously reduce carbon and consumer bills so that we don't delegitimise net zero in the eyes of consumers. DLUHC and the Housebuilders must consider the energy price crisis's impact on consumers. Although new build homes offer more energy-efficient homes with lower running costs than older properties, they will be far from immune to rising energy costs unless they come with solar as standard. Higher energy bills have significantly impacted lower-income households, pushing millions more into fuel poverty. This is an issue which shows no signs of dissipating and emphasises the urgency of investing in onsite power generation for all residential properties. A home with solar installed means lower bills, energy security and lower carbon emissions as evidenced by the Future Homes Standards consultation.

Question 9: Which option for the dwelling notional buildings for dwellings connected to heat networks set out in The Future Homes Standard 2025: dwelling notional buildings for consultation do you prefer? Please provide any additional comments to support your view on the notional building for dwellings not connected to heat networks.

We prefer Option 1 for all the reasons outlined in our answer to question 7, and with the same caveats around feasibility.

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

Solar Energy UK endorses Option 1 within the Future Building Standard, that is Solar PV panel coverage equivalent of 40% of the building's foundation area for side-lit spaces and 75% for top-lit spaces, although this should be caveated to allow for instances where rooflights may prohibit the design of solar. In addition, the standard should consider the operation and maintenance of installations as ensuring that panels can be accessed and maintained safely is key to a quality installation. Commercial rooftop solar is critical to the delivery of the 70GW UK solar ambition due to their substantial roof area. Given the benefits decarbonisation offers to society, it is then important to mandate the greatest amount of solar within the standard.

Without solar, businesses will be left to bear the brunt of volatile wholesale gas prices, it is now even clearer that the swift decarbonisation of heat and electricity supplies is in the national economic interest. On-site and commercially sized solar technologies offer businesses a unique opportunity to significantly reduce their energy costs for the system's lifespan, typically 35 years.

Producing power on-site is much more affordable than buying it from the grid. On-site heat and power generation is done at a fixed cost, meaning businesses can avoid exposure to further increases in energy bills. Research commissioned by the UK Warehousing Association (UKWA) and conducted by Delta-EE[2] has highlighted the dramatic benefits that warehouse rooftop solar has to addressing the UK's solar ambitions. Solar PV has the potential to reduce annual electricity costs by 40-80% and could save the warehouse sector £3 billion per year, this figure looks at retrofitted buildings, the savings for new buildings would be even greater.

Additionally, solar energy is zero-carbon at the point of generation. This improves the environmental performance of any building on which it is installed. Developing on-site generation capacity at point of construction also means that commercial buildings reduce the need for retrofit works at a later date.

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

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

Please see our response to question 10.

Section 5- Metrics

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

Yes, we agree. These metrics are sufficient to set performance requirements to achieve the objectives of the FHS; zero-carbon-ready homes that are affordable. We agree that the transition from Part L to the FHS should be as streamlined as possible, leading to greater simplicity for designers and developers.

2 https://www.ukwa.org.uk/wp-content/uploads/2022/09/Investment-Case-for-Rootop-Solar-Power-in-Warehousing-August-2022.pdf

Section 6. Updated guidance and minimum standards

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

Yes

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

Yes

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

Yes

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

No comment

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

No comment

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

No comment

6.3 Updated guidance and minimum standards for non-domestic buildings

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

No comment

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

No comment.

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

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

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

No comment

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

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

No comments

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

No comments

7. Material Change of Use

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

a. Yes
b. No, an elemental standard should be set with an option to use a notional building if the designer prefers

c. No, for another reason (please provide justification)

Yes.

If we are to achieve net zero, it is vital that all buildings achieve a higher energy efficiency standard, and whilst it may be more challenging to carry this out in a dwelling created through a material change of use than a new build dwelling, it is considerably easier than having to retrofit at a later date. The Future Homes Standard must ensure that building practices are in place to negate the need for further retrofit in the future, ensuring that all homes are future ready and affordable.

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

No, standards should also apply to non-dwelling accommodation e.g., student or patient accommodation, care homes, and hotels.

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

a. Yes
Recognising that low-rise and high-rise buildings have different opportunities for specification improvement makes sense.

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

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

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

We support the two illustrative energy efficiency requirements – they must include solar PV which is a low-cost, low-consequence intervention in an existing building.

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

n/a

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

Yes. It is important to have consistency to make it simpler for designers and developers.

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

None, building control bodies should not be able to relax MCU standards.

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

No comment

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

No comment

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

No comment

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

n/a

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

No comment

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

No comment

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

No comment

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

No comment

Section 8: Real-world performance of homes

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

No comment

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

We disagree. The Future Homes and Building Standard is a minimum requirement for homes and buildings to be energy efficient. Certificates should not be awarded for those who are merely following building regulations. Solar Energy UK would support a move to award certificates to those that go above and beyond the requirements, perhaps implementing a tiered gold, silver and bronze system.

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

n/a

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

n/a

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

Yes.

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

No comment

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

Solar Energy UK strongly endorses the MCS' MIS 3012 guidelines, which must be read in conjunction with the IET code of practice for battery storage systems.

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

No comment

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

No comment

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

n/a

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

No comment

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

n/a

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

No comment

Section 9. Heat networks

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

Section 10: Smart Meters

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

No comment

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

No comment

11. Accounting for exceptional circumstances

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

We disagree, as we believe this would lead too many loopholes and dispensations. However, if the Department does decide to allow certain relaxations, local authorities should have to defend their decision. If local authorities are going to take on this extra responsibility, it is important that they are resourced appropriately.

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

No comment

Question 63. Do you think that local authorities should be required to submit the applications they receive, the decisions they make and their reasoning if requested?
Question 64. Are there any additional safeguards you think should be put in place to ensure consistent and proportionate use of this power?

No comment

Section 12. Legislative changes to the energy efficiency requirements

No comment

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

We suggest that the amendment also refers to the concept of primary energy.

“Conservation of primary energy and minimisation of greenhouse gas emissions L1. Reasonable provision shall be made for the conservation primary energy and the minimisation of greenhouse gas emissions in buildings by—"

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

No comment

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

The Home Energy Model is broadly a positive change for solar. The move to a half hourly resolution is a welcome development as this is more aligned with enabling technologies that solar PV feeds into e.g time of use tariffs, smart meters, battery storage and hot water from PV fed immersion heaters. We support the adoption of the HEM**.**

Despite our overall support there was one glaring error within the model which we fed back to the software modelling team directly. The concern centred around how the model deals with PV generation as the orientation shifts away from south facing, the HEM drastically underrepresented the solar generation of the other directions. Whilst the team at DLUHC confirmed that there was a bug in the consultation version of the HEM and successfully addressed the issue, this remains a serious error and one which will need to be closely assessed by DLUHC. It still has the potential to distort responses to this consultation given that not all respondents will amend their original consultation responses and remodel with the fixed HEM. The department should take this into consideration when assessing consultation responses from housebuilders, who will have been taking the results from the HEM at face value.

The HEM has introduced a further level of sophistication, differentiating between 'moderately ventilated' (above roof) and 'unventilated' (roof integrated) solar panels. SEUK draws attention to research by Viridian Solar and Cambridge University Department of Engineering:

https://www.viridiansolar.co.uk/assets/files/briefings/08_In-roof_Performance_of_PV.pdf

This work found a 3% difference in annual generation between on-roof and in-roof systems and we request that the HEM is adjusted to reflect the evidence.

13.3 Reviewing the notional building approach for homes

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

As a general point, we believe the notional building approach has been very successful in providing specific and obvious guidance to specifiers and developer and is well used. As such, we believe that the notional building approach should be retained.

In regards to this consultation, the full notional house specification document references changes in the calculations behind the total panel power in kilowatt-peak (kWp). Whilst the 40% of ground floor area is unchanged from the current building regulations, the conversion factor from area to power has changed. The previous conversion factor (1/6.5) assumed solar PV panels have a power density of 153Wp/m2. The new factor (1/4.5) is a figure of 222Wp/m2. While at first glance the solar PV provision in the specification has not changed, it has in fact increased by 45%.

SEUK believes that this change accurately reflects the way that solar panel power density has increased over time from around 150Wp/m2 in 2015 to around 207Wp/m2 today, with an increase to 220Wp/m2 likely by the time the Future Homes Standard comes into effect.

Couple the above point with the change to solar orientation on the notional house (proposed as south, as opposed to south-east or west in the current version) and the fact that the notional house takes no account of the actual roof shape (in contrast to the way the rest of the house shape is taken into account), and we have significant concerns that housebuilders will find feasibility arguments against option 1.

We propose that consideration is given to ways to make the roof of the notional house better reflect the actual house being built:

- the solar orientation is as per the actual house, or the best elevation of the actual house rather than assuming always south
- the roof area given over to solar takes into account the maximum roof area available as judged by the energy assessor.

We believe that these are pragmatic adjustments that will help overcome concerns raised by the housebuilding industry about the feasibility of Option 1.

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

No comment

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

No comment

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

No comment

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

No comment

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

No comment

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

n/a

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

No comment

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

No comment

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

n/a

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

Solar Energy UK is advocating for Option 2, the chaotic launch of the 2021 building regulations cannot be repeated where compliance software was not ready even as new homes were being built under the new regulations.Time for development and thorough testing of the HEM will be required. Developers will need adequate time with properly working compliance software otherwise the transition will result in an interruption to supply.

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

No comment

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

Yes, we strongly agree.

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

We strongly urge that any development that wishes to build to the transitional standard must comply with Option 2 of the implementation of the FHS for the reasons stated above. It is critical that the HEM software is ready to launch and supply chains have a lead time to ramp up.

ENDS