



National Insulation Association

The Future Homes and Buildings Standards: 2023 consultation

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Closing Date: 6 March 2024

Response submitted by: **National Insulation Association**

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About the National Insulation Association

The National Insulation Association (NIA) represents the insulation industry in the UK with a member base comprised of installers, system certificate holders, and manufacturers who provide a wide range of insulation solutions for homes and buildings. The NIA and its members are fully committed to maintaining and raising standards within the insulation industry.

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?
<p>a. Option 1 (higher carbon and bill savings, higher capital cost)</p> <p>Option 1 is our preferred option because Option 2, as the Government's own modelling shows, would leave residents exposed to higher annual energy bills than the 2021 uplift to Part L. The FHS should not under any circumstances lead to higher energy bills for residents than existing new build standards. This would be a completely unacceptable outcome. Therefore, we do not consider Option 2 to be a viable option. Furthermore, as outlined by a cross-industry letter sent to the Secretary of State for Levelling Up, Housing and Communities, there is a risk that Option 2 would contravene the Government's public sector equality duty by introducing a standard which 'would unduly affect those on lower incomes'.¹</p> <p>While we support Option 1 over Option 2, it is worth noting that these are the two least ambitious options of the five considered by the Future Homes Hub in their 'Ready for Net Zero' Report.² For instance, home heating demand in the Report's Contender Specification 4 is just</p>	

¹ Good Homes Alliance (2024). Future Homes Standard Consultation Response. Available at: [Future Home Standard response - Good Homes Alliance](#)

² Future Homes Hub (2023). Ready for Zero: Evidence to inform the 2025 Future Homes Standard. Available at: [Ready for Zero - Evidence to inform the 2025 Future Homes Standard -Task Group Report FINAL- 280223- MID RES.pdf \(cdn-website.com\)](#)

25% of that in Option 1 of the FHS, meaning that the options under consideration in the FHS will incur significantly higher bills and carbon emissions. The NIA believe that the U-values outlined in the Option 1 specification need to be tightened further for a number of reasons.

- **To protect residents from high energy prices.** Heating systems installed under the FHS are expected to be dominated by electrified options like heat pumps. The high electricity to gas price ratio (3.86 to 1 as of the January 2024 price cap level)³ means that without significant energy demand reduction measures, residents with electrified heating will be exposed to high energy bills. As such, insulation measures which lower energy demand are especially important with electrified heating options. More ambitious insulation requirements will mean that households living in new builds with electric heating are protected from the risk of high energy bills. This is particularly important given the current cost-of-living and energy crises, with electricity prices expected to remain well above pre-crisis levels for the rest of the decade.⁴ Therefore, the NIA would like to see stricter U-values to protect vulnerable consumers from high electricity prices.
- **To increase the efficiency and reduce the running costs of heat pumps.** The efficiency of heat pumps is receptive to the fabric efficiency of the home. Introducing more ambitious U-values will increase the efficiency of heat pumps and reduce the cost they incur to run. Higher insulation standards should allow a smaller, cheaper heat pump to be installed that will have lower operating costs for residents. Real-world monitoring and testing is key to find out how the fabric works in practice, enabling more accurately sized heating systems to be installed. Correctly sized heat pumps will operate at a higher efficiency than incorrectly sized systems. Ambitious fabric standards bolstered by effective monitoring and testing will result in more efficient and cheaper-to-run heating systems.
- **To reduce the cost of electricity network expansion.** If the majority of new (and ultimately existing) homes are to replace gas with electric heating, a huge expansion of the electricity grid will be required. There is a huge capital cost associated with building more renewable generation capacity and expanding the electricity network. According to Ofgem and the Government, £170bn – £210bn will need to be invested in the grid by 2050 to achieve our net zero targets.⁵ Therefore, it is imperative that we build homes which use as little electricity to run as possible because the cheapest energy is the energy we don't use. High insulation standards which reduce the energy demand of new homes will reduce the scale by which the electricity network and additional renewable capacity will need to be expanded by, thus saving billions in capital costs for residents and government. It will also increase energy security by reducing our demand for energy imports from overseas.

³ Ofgem (2024). Energy price cap. Available at: [Energy price cap | Ofgem](#)

⁴ Jillian Ambrose (2023). 'Higher energy bills forecast for UK households next year', *The Guardian*. Available at: [Higher energy bills forecast for UK households next year | Energy bills | The Guardian](#)

⁵ Regen. Building a GB electricity network ready for net zero. Available at: [Building a GB electricity network for net zero \(regen.co.uk\)](#)

8.	What are your priorities for the new specification? (select all that apply)
<p>Our priorities for the new specification are:</p> <ul style="list-style-type: none"> • Lower energy bills. Lower energy bills are a vital consideration, particularly in the context of the ongoing cost of living and energy crises. The FHS should make every effort to reduce energy bills for residents. For this reason, we support Option 1 which would result in significantly lower energy bills compared to current new build standards. However, as outlined in our response to Question 7, we believe that Option 1 should be more ambitious in terms of insulation. Setting higher insulation standards, in conjunction with the solar PV provisions in Option 1, would ensure that energy bills are as affordable as possible for residents. • Carbon savings. Higher insulation standards would also have the added advantage of additional carbon savings. The generation emissions factor for grid electricity in the UK is still around 0.2 kg CO₂e per kWh.⁶ This means that every unit of electricity consumed carries with it associated CO₂ emissions. Given that the Government does not expect the UK's electricity grid to be fully decarbonised until 2035⁷, it is imperative that new homes consume as little electricity as possible. The most effective way to do this is by setting higher minimum insulation standards within the FHS. • Protecting residents' health. Option 1 sets higher ventilation standards, which are important to prevent the risk of damp and mould, and the potential health issues associated with it. However, we think that Option 1 could also be more ambitious when it comes to ventilation. For instance, it could require mechanical ventilation with heat recovery (MVHR). This would improve air quality, and reduce the risk of condensation and mould, while also conserving heat energy. Strict ventilation minimum requirements are important to go along with increased insulation and airtightness requirements. A combination of high insulation and ventilation standards are the best way to protect residents' health. • Reducing pressure on the electricity grid and the capital cost needed to upgrade it. As mentioned in Question 7, the electrification of heat will necessitate a huge expansion of the electricity grid, which comes with a large capital cost associated with building more renewable generation capacity and expanding the electricity network. Therefore, high standards around insulation and solar PV are important to reduce the electricity that new homes require from the grid. This will increase our energy security and save billions in capital costs for government and taxpayers. 	
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?

⁶ ITP Energised (2023). New UK grid emissions factors 2023. Available at: [New UK Grid Emissions Factors 2023 - ITP Energised](#)

⁷ Carbon Brief (2023). CCC: Here's how the UK can get reliable zero-carbon electricity by 2035. Available at: [CCC: Here's how the UK can get reliable zero-carbon electricity by 2035 - Carbon Brief](#)

a. Option 1 (higher carbon and bill savings, higher capital cost)	
10.	Which option do you prefer for the proposed non-domestic notional buildings set out in the NCM modelling guide?
a. Option 1	
11.	What are your priorities for the new specification?
<p>Our priorities for the new specification are:</p> <ul style="list-style-type: none"> • Lower energy bills. For commercial buildings, lower bills are important to enable businesses to reduce their overhead costs, which continue to be a significant burden for many during the energy crisis. A survey conducted by PwC in 2023 found that 77% of business respondents had to raise their prices over the past two years as a result of energy-related expenditures⁸, thus driving inflation across the economy. Moreover, reducing the percentage of their budget spent on overhead costs will enable businesses to invest more in productive activities, such as hiring and training staff and creating economic growth. For this reason, we support Option 1 which would result in significantly lower energy bills compared to current standards. However, we believe that Option 1 should be more ambitious in terms of insulation standards, as set out in our responses to Questions 7 and 8. • Carbon savings. Our preferred choice is Option 1 as it would deliver higher carbon savings. However, we would like to see higher insulation standards, as mentioned in our responses to Questions 7 and 8. • Reducing pressure on the electricity grid and the capital cost needed to upgrade it. As mentioned in Questions 7 and 8, high standards for insulation and solar PV are important to reduce the electricity that new buildings require from the grid. This will increase our energy security and save billions in capital costs for government and taxpayers. 	
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?
<p>a. Yes, and I want to provide views on the suitability of these metrics and/or their alternatives.</p> <p>We agree with the three metrics suggested, however we would like to see an additional metric added to take into account the building's real-world fabric performance. This additional metric would be based on the results of mandatory post occupancy testing, which we have outlined our support for in Question 40. This Actual/Real Fabric Energy Efficiency metric could be compared to the DFEE to test how the property's real-world fabric performance compares to its target DFEE rate. Including this as an additional metric would help to close the performance gap between how homes are designed and built. This would give residents and government confidence that buildings are actually being constructed in practice to the standards stipulated by the FHS and Building Regulations.</p>	

⁸ Sidhi Mittal (2024). 'British businesses struggling to find right solutions to cut energy costs, survey finds', *Edie*. Available at: [UK Businesses Grapple with Rising Energy Costs According to PwC Survey \(edie.net\)](https://www.edie.net/news/uk-businesses-grapple-with-rising-energy-costs-according-to-pwc-survey)

Mandatory post-occupancy testing, backed up by a metric that measures real-world fabric performance, would reward good performance from housebuilders and retrofit businesses, and generally drive up quality standards across the housing sector.	
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.	
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?
No comment.	
15.	Do you agree that operating and maintenance information should be fixed to heat pump units in new homes?
No comment.	
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.	
17.	Do you agree with the proposed changes to Section 4 of draft Approved Document L, Volume 1: Dwellings, designed to limit heat loss from low carbon heating systems?
a. Yes.	
18.	Do you agree with the proposed sizing methodology for hot water storage vessels for new homes?
No comment.	
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.	
20.	Do you agree with the proposed guidance on the insulation standard for building heat distribution systems in Approved Document L, Volume 2: Buildings other than dwellings?
a. Yes.	
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.	
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,	
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?
No comment.	

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 comment.	
25.	Should we set whole-building standards for dwellings created through a material change of use?
a. Yes.	
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?
<p>b. No, standards should also apply to non-dwelling accommodation e.g., student or patient accommodation, care homes, and hotels. In many of the buildings classified as non-dwelling accommodation, residents live there on a semi-permanent basis. We do not believe that buildings which are used as a main place of residence for a significant proportion of the year, such as care homes, patient accommodation, and student accommodation, should be subject to weaker energy efficiency requirements than residential conversions.</p> <p>Care homes and patient accommodation are used to house some of the most vulnerable people in society, who may be more susceptible to living in cold, damp and inefficient homes. Thus, it is crucial that these types of non-dwelling accommodation are subject to high MCU energy efficiency requirements.</p>	
27.	Should different categories of MCU buildings be subject to different requirements?
a. Yes.	
28.	Which factors should be taken into account when defining building categories? (check all those that apply)
<p>The following factors should be taken into account when defining building categories:</p> <ul style="list-style-type: none"> • height of the building, i.e., low versus mid- to high-rise buildings • floor area of the building • whether the conversion is a part- or whole-building conversion 	
29.	Do you agree with the illustrative energy efficiency requirements and proposed notional building specifications for MCU buildings?
a. Yes.	
30.	If you answered no to the previous question, please provide additional information to support your view. Select all that apply. The requirements are:
Not applicable.	
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?
<p>b. Yes, and I want to provide additional suggestions or information to support my view.</p> <p>As outlined in our response to Question 12, we would also support the inclusion of a metric that measures real-world fabric performance.</p>	
32.	Under what circumstances should building control bodies be allowed to relax an MCU standard?

<p>Building control bodies should be allowed to relax an MCU standard under the following circumstances:</p> <ul style="list-style-type: none"> • The technical or practical feasibility of achieving the standards. It is important that buildings subject to an MCU are upgraded to the highest possible standards of energy efficiency. However, in some cases, we accept that it may not be technically or practically feasible to reach the required standards, for example, if there is no space or access to install the required insulation. • Consideration of historic and traditional dwellings. We also recognise that reaching the required MCU standard might not be possible or practical in some historic and traditional buildings, particularly where listed building or conservation status applies. 	
33.	<p>Do you have views on how we can ensure any relaxation is applied appropriately and consistently?</p> <p>As set out in our response to Question 32, we recognise that there are certain circumstances where MCU standards may need to be relaxed for practical purposes. However, it is crucial that any exemptions to the standards are robustly policed and accompanied by clear guidance to make sure that developers are only granted exemptions when there is a genuine barrier preventing adherence to the standards. Wherever practically possible, developers must be required to meet high energy efficiency standards in order to ensure that the benefits of energy efficiency measures for the climate and building occupants are fully realised.</p> <p>Therefore, the NIA believe that the following should be in place to ensure any relaxation is applied appropriately and consistently:</p> <ul style="list-style-type: none"> • Only formal relaxation or dispensation through the local authority should be possible. • There should be guidance on circumstances where relaxation of the notional standard may be appropriate so that it is clear and unambiguous for developers when they are and are not required to meet MCU standards.
34.	<p>Should a limiting standard be retained for MCU dwellings?</p> <p>a. Yes</p> <p>Even in dwellings where it is not possible to achieve the MCU whole building standard, there should still be minimum limiting standards for fabric insulation. These minimum standards are important to safeguard occupants from high energy bills.</p> <p>They are also critical to prevent building defects from occurring. If there are sub-standard levels of insulation and ventilation within MCU dwellings, there will be a significantly increased risk of damp and mould, which poses a serious threat to residents' health,</p>
35.	<p>If a limiting standard is retained, what should the limiting standard safeguard against?</p> <p>Limiting standards should be retained and they should safeguard against:</p> <ul style="list-style-type: none"> • risk of moisture, damp and mould • high energy demand and energy bills

36.	Do you wish to provide any evidence on the impacts of these proposals including on viability?
No comment.	
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?
b. Yes, and photographic evidence is needed.	
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?
b. Yes, and I'd like to provide further information.	
<p>We agree that consumers buying MCU homes should be provided with a Home User Guide when they move in. Supporting information and advice is important to make sure consumers operate energy efficiency technologies in a way that maximises their efficiency and effectiveness. This is particularly important when it comes to operating low carbon and smart technologies that they may be unfamiliar with.</p>	
39.	Do you agree that homes that have undergone an MCU should be airtightness tested?
b. Yes, and I'd like to provide further information.	
<p>Airtightness testing will help to enforce fabric requirements by ensuring that the building fabric performs in practice as modelled. We would support mandatory airtightness testing for all homes including those that have undergone an MCU. This should be accompanied by increased minimum ventilation standards as a higher level of airtightness without sufficient ventilation can increase the risk of condensation and mould.</p>	
40.	Do you think that we should introduce voluntary post occupancy performance testing for new homes?
b. Yes, and I'd like to provide further information	
<p>Introducing post occupancy performance testing will help to protect consumers from experiencing higher bills and lower comfort levels. It will also build consumer confidence in the benefits of energy efficiency measures and the quality of work being carried out by the industry. However, we would like to see post occupancy performance testing implemented as a mandatory requirement, rather than a voluntary measure. Historically, voluntary options have seen very low uptake, therefore implementing this as a voluntary measure will likely result in only a small uptake in occupancy testing, and create an unfair market.</p>	
<p>In addition, this approach creates a risk for housebuilders, as those who engage with post occupancy testing could be penalised for reporting the post occupancy testing results – as without mandated testing, 100% compliance is assumed.</p>	
<p>Post occupancy testing ensures that homeowners get maximum benefit and the lowest possible bills from purchasing a new home, by reassuring them that their home achieves the efficiency level promised in the design in practice. Post occupancy testing is also important to ensure that homes have correctly sized heating systems, particularly as incorrectly sized heat pumps will operate at a lower efficiency than correctly sized ones. Real-world monitoring and testing is</p>	

crucial to find out how the fabric works in practice. This measurement will enable more accurately sized heating systems to be installed and ensure the house operates as an efficient whole house system. It is crucial that the fabric meets its target design efficiency in practice under real-world occupancy.

Mandatory testing should instead be introduced through sampling a percentage of homes to ensure compliance. For example, occupancy testing could be mandated for 10% of completions. Mandating post occupancy testing and making results publicly available will assist with improving quality and provide evidence for real-world efficiencies to monitor effectiveness and non-compliance with standards. This knowledge would help to improve the overall quality of the industry, alleviating the performance gap and raising consumer confidence. There is likely to be a significant performance gap without mandatory post occupancy testing.

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.

b. Yes, and I want to provide additional suggestions or information.

Implementing a government-endorsed Future Homes Standard brand is a positive way to incentivise housebuilders to engage with post occupancy testing to improve and maintain quality standards.

However, there must be a robust quality assurance process in place to ensure that the brand is credible and trustworthy, or risk damaging consumer confidence in the FHS. The brand should only be awarded to housebuilders that have consistently high-quality outputs, and not simply for those who measure performance. This aligns with leading a 'race to the top' on quality within the market. If there is not a robust process in place that only rewards consistently high-quality completions, the brand will not achieve the intended purpose and consumers will have difficulty differentiating between good quality and poor quality homes.

In addition, a Future Homes Standard brand is a good opportunity to introduce a public awareness campaign to improve consumer education about energy efficiency measures and standards. This could help with tackling the performance gap regarding the issue of user behaviour.

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?

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

We support the proposed changes, as more rigorous testing should lead to higher quality installations of ventilation systems and reduce the risk of condensation and mould resulting from sub-standard installs.

Nonetheless, we recognise that the increased cost of testing equipment, such as calibrated powered flow hoods, represents a barrier to compliance for some contractors. Therefore, we

would urge the Government to provide support for contractors to purchase the necessary equipment. This will increase rates of compliance with the new ventilation rules and lead to higher quality across the insulation and ventilation sector.	
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?
b. Yes, and I'd like to provide further information.	
We support increased testing of ventilation systems installed into existing homes. This will ensure that ventilation systems installed into residents' homes are installed correctly and perform as intended. More extensive testing should reduce the incidence of poor quality installs, which can have damaging consequences for residents.	
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?
No comment	
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.	
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?
No comment.	
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?
b. Yes, and I'd like to provide further information.	
We welcome further clarity on the options for certifying fixed building services. It is crucial that robust monitoring and enforcement mechanisms are in place to make sure that work is being carried out to the required standard. To this end, it is clear that building control bodies need more resources in order to properly enforce compliance with Building Regulations. For the Future Homes Standard to achieve its objectives, it is absolutely essential that it is backed up by effective enforcement mechanisms.	
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.	
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.
No comment.	
50.	Do you have a view on how Home User Guides could be made more useful and accessible for homeowners and occupants, including on the merits of requiring developers to make guides available digitally? Please provide evidence where possible.

a. Yes, (please provide further details)	
Developers should be required to make guides available digitally alongside paper copies. It is important that information is easily accessible for existing and also future residents. It can be very difficult for residents to find out property-specific information when they move into a new home, including details of any historic building works or retrofit works that have been carried out. Making Home User Guides digitally available and searchable via a centralised online database would make it much easier for residents to find out important information and help them to maintain their home more effectively. Many consumers may be unfamiliar with some of the technologies installed in new homes, so Home User Guides available digitally are vital to aid their understanding of new technologies and how to operate them effectively.	
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.
No comment.	
52.	Do you think that local authorities should be required to ensure that information required under Regulations 39, 40, 40A and 40B of the Building Regulations 2010 has been given to the homeowner before issuing a completion certificate?
a. Yes.	
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.	
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.	
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.	
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.	
57.	What are your views on how to ensure low-carbon heat is used in practice?
No comment.	
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.	
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.	

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.	
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, but we believe that relaxation should only be allowed in exceptional circumstances, if for instance, the required energy efficiency measures cannot be installed safely. Use of this power must be policed and monitored very closely to ensure that it is not being used as a loophole to undercut energy efficiency standards without very good reason.	
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.	
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?
b. Yes, and I'd like to provide further justification.	
<p>If Regulation 26 is subject to potential relaxation or dispensation, the relaxation process must be monitored very closely. Local authorities should be required to submit records of their decisions and the justifications for making them. This is essential to ensure that relaxation powers are not abused and do not become a convenient loophole by which developers can bypass the Future Homes and Buildings Standard.</p> <p>Local Authorities' use of these powers should be monitored closely and subject to enforcement action if necessary. For instance, if certain Local Authorities are found to be granting particularly high numbers of dispensations compared to others, an investigation may be required into whether they are abusing dispensation powers, accompanied by appropriate enforcement action if abuses are found to have been taking place.</p>	
64.	Are there any additional safeguards you think should be put in place to ensure consistent and proportionate use of this power?
As noted in our response to Question 63, stringent monitoring and enforcement is critical to ensure consistent and proportionate use of this power.	
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.	
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.	
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, and I'd like to provide further information.	

<p>We agree with the use of the Home Energy Model (HEM) as the approved methodology to demonstrate compliance with the FHS. A replacement for SAP is long overdue and we welcome the increased accuracy that the HEM will bring.</p> <p>However, given the tight timelines involved and the fact that the HEM is not yet finalised, there is a risk that it may not be ready for the introduction of the FHS. The Government's consultation on the HEM makes it clear that the HEM is still undergoing development in multiple areas and lacks detail on certain aspects of the model's design. The Government must work quickly to ensure that the HEM is fully finalised and any major issues with its design are resolved by the time the FHS is introduced. It is absolutely essential that the introduction of the FHS is not pushed back due to issues or delays with the HEM.</p>	
68.	Please provide any comments on the parameters in the notional building.
No comment.	
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.	
70.	Do you agree with the revised guidance in The Future Homes Standard 2025: dwelling notional buildings for consultation no longer includes the average compliance approach for terraced houses?
a. Yes	
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	
72.	Do you agree with the proposed approach to determine U-values of windows and doors in new dwellings?
a. Yes	
73.	Do you agree with the proposal to remove the default y-value for assessing thermal bridges in new dwellings?
a. Yes.	
74.	Do you have any information you would like to provide on the homes built to the Future Homes Standard using curtain walling?
No comment.	
75.	Do you agree with the methodology outlined in the NCM modelling guide for the Future Buildings Standard?
No comment.	
76.	Please provide any further comments on the cSBEM tool which demonstrates an implementation of the NCM methodology.
No comment.	
77.	Please provide any further comments on the research documents provided alongside the cSBEM tool and which support the development of the NCM methodology, SBEM and iSBEM.
No comment.	

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	
Option 1 provides an adequate transitional period, whilst ensuring that we continue the momentum towards net zero targets. Furthermore, this option is followed by a separate 12-month transitional period anyway, which should minimise the impact on developers.	
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.	
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	
<p>The NIA agree that the 2010 and 2013 energy efficiency transitional arrangements should be closed so that all new buildings are built to the Future Homes and Buildings Standards. Maintaining previous standards would be incompatible with reaching net zero targets and unfair for consumers who would be burdened with the costs of retrofitting a home built to old, outdated standards. This transition is fairest for the consumer, drives the construction industry to adopt more sustainable practices and aligns with net zero targets.</p> <p>To aid this transition, information, advice and guidance should be in place to support homeowners and housebuilders through the transition.</p>	
81.	What are your views on the proposals above and do you have any additional evidence to help us reach a final view on the closing of historical transitional arrangements?
No comment.	
82.	Part O does not apply when there is a material change of use. Should it apply?
No comment.	
83.	Apart from material change of use, is there anything missing from the current scope of Part O?
No comment.	
84.	Can you provide evidence on how the addition of extensions or conservatories to domestic buildings can impact overheating risk on an existing building?
No comment.	
85.	We are currently reviewing Part O and the statutory guidance in Approved Document O. Do you consider there to be omissions or issues concerning the statutory guidance on the simplified method for demonstrating compliance with requirement O1, for buildings within the scope of requirement O1?
No comment.	

86.	Do you consider there to be omissions or issues concerning the statutory guidance on the dynamic thermal modelling method for demonstrating compliance with requirement O1 for all residential buildings?
No comment.	
87.	Do you consider there to be omissions or issues concerning the statutory guidance on ensuring the overheating mitigation strategy is usable for buildings within the scope of requirement O1?
No comment.	
88.	Do you consider there to be omissions or issues concerning the statutory guidance on protection from falling?
No comment.	
89.	Are you aware of ways that Approved Document O could be improved, particularly for smaller housebuilders?
No comment.	
90.	Does Regulation 40B require revision?
No comment.	
91.	Do you consider there to be omissions or issues concerning the statutory guidance on providing information?
No comment.	
92.	Are there any improvements that you recommend making to the information provided about overheating in the Home User Guide template?
No comment.	
93.	Are there any omissions or issues not covered above with the statutory guidance in Approved Document O that we should be aware of?
No comment.	