

# 18 KEY QUESTIONS & ANSWERS

The Future Homes and  
Building Standard  
consultation



Respond to the consultation by  
**27<sup>th</sup> March 2024**

**LETI** firmly believes that by 2030 all new buildings need to be Net Zero Carbon in operation, which means that by 2025 all new buildings must be designed to meet **Net Zero**.

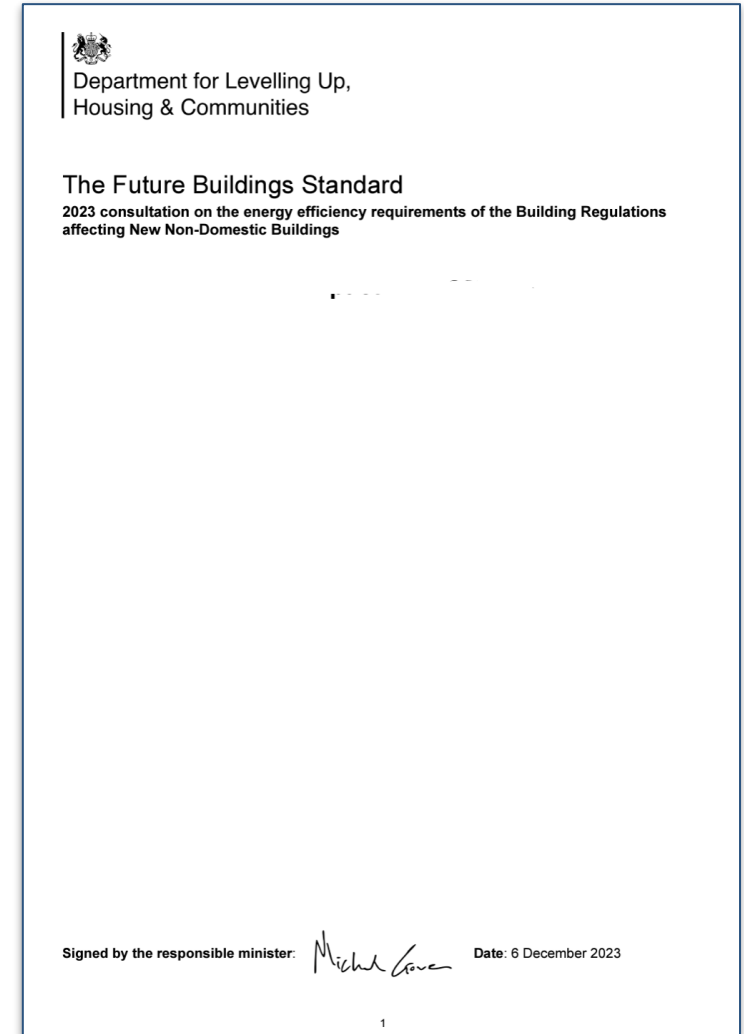
If **you** share this view we encourage you to respond to the Future Buildings Standard consultation.



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# Please respond to the consultation!

Influencing the building regulations may be the **greatest impact** that you have in your career, **please respond to the consultation.**

Go to [Future Homes & Building Standards 2023 consultation](#) for all of the consultation documents & fill out this [this online survey](#) to respond to the consultation by **Wednesday 6th of March**, you can do this as an individual or on behalf of an organization.

## **If you have 10-15 mins**

LETI have identified 18 key questions, and we encourage you to respond to these questions, as a priority. This document shares with you what LETI's choice will be. If you disagree, feel free to respond differently though.

## **If you have more time**

Complete a full consultation response and submit evidence to back up your views. See [www.leti.uk/FHS](http://www.leti.uk/FHS) for more information, which you might find helpful to reference when putting together your response.



# 18 key questions... and LETI responses

- The consultation documents are long, and there are 95 questions.
- If you have limited time, LETI have identified 18 key questions, which we think are important to respond to. You can just select one of the multiple choice answers to each of these 18 key questions. It should not take you more than 10-15 minutes.
- We encourage you to add your own justification and any evidence you are aware of.
- Please do not copy/paste LETI's justification behind our response, this is for information only. DLUHC are keen to hear your views (but duplicate 'text' responses are not helpful and just slow down the consultation review process)



# 18 key questions... and LETI responses

- Click here to access the [online survey](#)
- Before you begin answering the questions, you need to complete 4 short pages of information about you.

The screenshot shows the top of a government website. At the top left is the logo for the Department for Levelling Up, Housing & Communities. To the right is a search bar. Below the logo is a navigation menu with links for Home, Find activities, and Building Safety. A dark blue banner across the top contains the text 'Future Homes and Building Standards 2023 consultation'. Below this banner, on the left, it says 'Page 1 of 19' with a progress bar, 'Closes 6 Mar 2024', and a note about cookies. The main heading is 'Introduction', followed by a paragraph explaining the purpose of the consultation. Below the text are two form fields: 'What is your name?' with a 'Name' label and an input box, and 'What is your email address?' with an 'Email' label and an input box. At the bottom of the form area are two buttons: 'Save and come back later...' and 'Continue >'.



# 18 key questions... and LETI responses

- Then you can just answer the questions you want to and skip the rest

The screenshot shows the top of a government consultation page. At the top left is the logo for the Department for Levelling Up, Housing & Communities, with navigation links for Home, Find activities, and Building Safety. A search bar is located at the top right. Below this is a dark blue header with the text 'Future Homes and Building Standards 2023 consultation'. On the left side, there is a progress indicator showing 'Page 5 of 19' and a progress bar, the closing date 'Closes 6 Mar 2024', and a note that cookies are enabled. The main content area is titled '4 Performance requirements for new buildings' and includes a link to the full consultation paper. Below this is a question box with two radio button options.

Department for Levelling Up,  
Housing & Communities

Home Find activities Building Safety

Search

## Future Homes and Building Standards 2023 consultation

Page 5 of 19

Closes 6 Mar 2024

This service needs [cookies enabled](#).

### 4 Performance requirements for new buildings

Before responding to this survey you should read the Future Homes and Buildings Standards: 2023 consultation paper available here: <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation>

This page of survey questions relates to Section 4 'Performance requirements for new buildings' of the consultation paper.

**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?**

- a. Option 1 (higher carbon and bill savings, higher capital cost)
- b. Option 2 (lower carbon savings, increase in bill costs, lower capital cost)



# The Future Homes and Building Standard consultation

18 Key Questions... and LETI responses

Please do not copy/paste LETI's justification behind the LETI response, this is for information only. We will hear your views (but duplicate 'text' responses are not helpful and just slow down the consultation).



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Question

7

## Performance requirements for new dwellings

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?

What will LETI respond?

a. Option 1 (higher carbon and bill savings, higher capital cost)

**Why?**

- Option 1 is more energy efficient than Option 2.
- It will lead to lower energy use, lower peak demand and lower energy bills for the residents.
- It also includes PVs, which is positive.





Question

8

## Performance requirements for new dwellings

What are your priorities for the new specification?

What will LETI respond?

- ✓ lower bills
- ✓ carbon savings

**Why?**

- Delivering homes which are 'Net Zero ready' is one of the key aims of the FHS and the FBS. Therefore, carbon savings ought to be a priority.
- Reducing residents' energy bills must also be a priority as the Future Homes Standard represents a significant opportunity.



Question

9

## Performance requirements for new dwellings

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?

What will LETI respond?

### Option 1

**Why?**

- Option 1 is more energy efficient than Option 2.
- It will lead to lower energy use and lower energy bills for the residents.
- It also includes PVs, which is positive.



Question

10

## Performance requirements for non-domestic buildings

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

What will LETI respond?	Option 1
Why?	<ul style="list-style-type: none"><li>• It also includes PVs, which is positive.</li><li>• The impact assessment shows the overall benefit to society for Option 1 is significantly more than for Option 2, which would result in a net cost to society</li></ul>



Question

11

## Performance requirements for non-domestic buildings

What are your priorities for the new specification?

*select all that apply)*

What will LETI respond?

- lower bills
- carbon savings

**Why?**

- Delivering buildings which are 'Net Zero ready' is one of the key aims of the FHS and the FBS. Therefore, carbon savings ought to be a priority.
- The reduction of energy expenditure on non-domestic buildings should be a co-benefit.



Question

12

## Metrics

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?

What will LETI respond?

c. No, I think delivered energy should be used

**Why? For this question we encourage you to state in the comment box the text in red. (As we feel like the answer that LETI would support is not available)**

- We support the delivered energy metric, as it can be measured post-occupancy, creating a feedback loop with the design predictions.
- **It should also include an estimate for unregulated energy.**
- **Primary energy is a confusing and unnecessary metric which cannot be measured by residents and occupants.**
- **We are strongly in favour of having a Fabric energy efficiency metric, but it should be an absolute metrics based on space heating demand (kWh/m<sup>2</sup>/yr).**

Question

31

## Material change of use - Metrics

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?

What will LETI respond?	c. No
Why?	<ul style="list-style-type: none"><li>• We support the delivered energy metric, as it can be measured post-occupancy, creating a feedback loop with the design predictions.</li><li>• Primary energy is a confusing and unnecessary metric which cannot be measured by residents and occupants.</li><li>• We are strongly in favour of having a Fabric energy efficiency metric, but it should be n absolute metrics based on space heating demand (kWh/m<sup>2</sup>/yr).</li></ul>



Question

40

## Real-world performance of homes

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

What will LETI respond?

a. Yes

**Why?**

- It is essential that we reduce the performance gap and close the feedback loop between how much energy future homes use versus the design prediction, Post-occupancy performance testing has therefore a key role to play.
- It should be mandatory, not voluntary.



Question

53

## Heat networks

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 CO<sub>2</sub> levels for the Future Homes or Buildings Standard?

What will LETI respond?

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

**Why?**

This is subject to connection not being mandated and to heat networks not being given an unfair advantage compared to on-site communal and individual low carbon heating systems:

- Condition 1: the methodology used to calculate the CO<sub>2</sub> levels of the heat network must not be based on sleeving.
- Condition 2: the methodology must be peer reviewed by a carbon expert independent from heat network interests.





Question

54

## Heat networks

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?

What will LETI respond?

c. No

**Why?**

- The sleeving methodology is not scientifically robust.
- It is biased towards the on-going use of heat networks even when most of their heat is generated by fossil fuels.
- It does not provide a clear pathway for buildings already connected to the network to decarbonise.
- It has not been peer reviewed by a carbon expert independent from heat network interests.



Question

55

## Heat networks

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?

What will LETI respond?

c. No

**Why?**

- The sleeving methodology is not scientifically robust.
- It is biased towards the on-going use of heat networks even when most of their heat is generated by fossil fuels.
- It does not provide a clear pathway for buildings already connected to the network to decarbonise.
- It has not been peer reviewed by a carbon expert independent from heat network interests.

Question

56

## Heat networks

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?

What will LETI respond?

a. Yes

**Why?**

- If the Future Homes Standard and the Future Buildings Standard signal the end of fossil fuels, heat networks should not be the 'Trojan Horse' of on-going fossil fuel heating.



Question

61

## Accounting for exceptional circumstances

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?

<b>What will LETI respond?</b>	b. No
<b>Why?</b>	<ul style="list-style-type: none"><li>• Building Regulations should be the minimum standards across the Country without exception.</li><li>• If enabled, these exceptions are likely to affect the poorest areas of the country.</li></ul>



Question

66

## Legislative changes to the energy efficiency requirements

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?

What will LETI respond?	c. No
Why?	<ul style="list-style-type: none"><li>• We do not agree that regulations 25A and 25B will become redundant once this version of the Future Homes and Buildings Standards have been introduced as they do not go far enough.</li><li>• We disagree with the consultation statement that with these standards homes and non-domestic buildings will be 'zero-carbon ready', meaning that no further work will be necessary to ensure they have zero carbon emissions as the electricity grid continues to decarbonise.</li><li>• We We consider that the aims of regulation 25A and 25B will therefore</li></ul>



Question

67

## A review of the approach to setting standards

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?

<b>What will LETI respond?</b>	a. Yes
<b>Why?</b>	<ul style="list-style-type: none"><li>• The Home Energy Model represents a significant step forward compared with SAP.</li><li>• If development efforts continue it should be able to predict space heating demand, energy use, renewable energy generation and demand flexibility more accurately than SAP.</li></ul>



Question

78

## Transitional Arrangements

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.

What will LETI respond?

a. Option 1

**Why?**

- Extending transitional arrangements beyond 6 months will enabled more gas boilers to be installed and inefficient homes to be built, reducing our carbon budgets and creating a future retrofit legacy.



Question

80

## Transitional Arrangements

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?

What will LETI respond?

a. Yes

**Why?**

- Maintaining these transitional arrangements will enable more gas boilers to be installed and inefficient homes to be built, reducing our carbon budgets and creating a future retrofit legacy.





Question

82

## Overheating

Part O does not apply when there is a material change of use.

Should it apply?

What will LETI respond?

a. Yes

**Why?**

- Material change of use represents a substantial amount of new homes each year. Residents should access the same level of protection against overheating than any other resident.



## Other actions you can take!

1. **Sign up to the collective letter** to the secretary of state
2. If you are a local authority - reach out to your Members
3. Submit additional **evidence to DLUHC**
4. Share the LETI key messages and **encourage others to response!**



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### LETI TOOLKIT

How to respond to the consultation

The Future Homes and Building Standard consultation

LETI

Respond to the consultation by  
**6<sup>th</sup> March 2024**



Download the LETI toolkit to find out more at  
[www.leti.uk/fhs](http://www.leti.uk/fhs)

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