LETI- Future Homes Part L Consultation - Key messaging

LETI believes that by 2030 all new buildings will need to operate at Net Zero (i.e. annual net zero carbon emissions), which means that by 2025 100% of all new buildings must be designed to Net Zero. To achieve this we need a clear plan as to how we will measure compliance with this target at design stage in a way that informs good design.

To ensure ALL new buildings meet Net Zero Carbon, Approved Document Part L needs to become the legislative driver for this.

Problems with the proposed consultation

The proposals for Part L 2020 are likely to result in a step backwards, in a climate where we need a huge leap forward. A strong consultation response by the industry on Part L is required, with a dramatic shift needed- otherwise we will not meet our climate change targets. Influencing this regulation is the greatest change that you could personally make in terms of reducing carbon emissions.

There is no connection between the proposed changes to Part L and the need for an urgent response to Climate change. Two million homes are likely to be built between 2020 and 2025. If the required standard is not met when homes are first constructed, they will require retrofit before 2050, which is like to be five times more expensive than building them properly in the first place.

Key issues with the proposed consultation

1. Fabric performance is likely to get worse – a home in 2020 could be less insulated than a home under 2013 Building Regulations. The use of an energy efficient heating system has the ability to mask fabric performance.
2. Carbon and primary energy factors disguise the energy efficiency of a home. The energy consumption of a home can be high but carbon emissions low. This leads to inefficient homes which appear to be performing well.
3. Local authorities will lose the ability to meet their climate emergency zero carbon commitments if they are stripped of their powers to go above and beyond the new Part L.

What should be required by legislation so that new homes are Net Zero Carbon

The Part L consultation does not propose a change in calculation methodology or point to a change in methodology in the future - this is very worrying. The Part existing L method was not intended as a tool to achieve Net Zero Carbon and should not be used as such.

Regulation needs to be based on the actual energy a building consumed in operation (regulated and unregulated). This is directly related to how much is used at the meter and energy billing. If we don't shift to this way of thinking we will always struggle to quantify whether our buildings are meeting climate change targets. To this end, future targets should be based on an at the meter energy metric such as kWh/m^2/yr rather than carbon emissions or primary energy.

Whole life and embodied carbon is not currently considered under building regulations.

LETI's direct response to the consultation

Whilst LETI believe there should be a major shift in the way we calculate and quantify the sustainability of our homes, we also understand that this consultation is unlikely to take into account significant changes. Therefore, the following points provide a more direct response to the proposals, which are in addition to our feedback on our wider aspirations for Part L.

1. **The Fabric Energy Efficiency Standard (FEES) must not be removed. It must be retained with notional fabric U-values and airtightness further improved**. The loss of FEES means that technology can be used under the 2020 proposals to mask a poor building fabric. The u-values set out in the minimum standards for fabric performance are not onerous enough to justify the removal of FEES. As it stands homes can be built with less insulation in 2020 than they needed under Part L 2013. New homes should not add to the retrofit burden due to being built with poor building fabric in 2020. **(Consultation Question 13)**

2. **Include performance metrics such as Energy Use Intensity (EUI) in KWh/m²/yr**: the proposals currently include metrics based on carbon and primary energy, neither of these connect consumers with actual building performance and do not encourage building performance directly, as they are heavily dependent on the wider system. We need a metric based on the total energy use (regulated and unregulated) of the dwelling which can be verified by measurements by the dwelling's energy meter(s), as well as a metric covering the regulated loads. We have had too many indirect 'indicators' to date that end up with unintended consequences. Cost unduly drives gas use and grid carbon factor reduction masks a building's energy efficiency performance. **(Consultation Question 7 – Response c)**

3. **The 31% carbon reduction target is not a sufficient step forward. We want to see homes expected to make at least a 50% reduction in carbon emissions, ideally 60%.** The update in carbon factors is supported. However, the target carbon emission reductions have not been re-aligned. An identical home that had a 3% reduction in carbon emissions under 2013 regulations could now have a 75% reduction in carbon emissions under the 2020 regulations. The proposed option 1 - 20% reduction and option 2 – 31% reduction in the consultation does not take this into account. **(Consultation Question 6 – Response d)**

4. **Local authorities should not be stripped of their ability to set stretching and locally applicable targets.** The Planning and Energy Act should not be amended. Currently local authorities are able to set carbon targets appropriate to their area and to support their climate emergency plans. Removing this ability would increase the risk of them not meeting their climate change targets. **(Consultation Question 4 – Response d)**

5. **A shift to energy consumption monitoring needs to be set out in the 2020 review.** Energy consumption should be measured and verified. In 2020 the energy consumption of all new homes should be disclosed (in a format that supports data protection) as a driver for operational performance and to promote improvements in energy targets. In 2025 compliance should be based on operational performance based on (metered) kWh/m²/yr targets (e.g. domestic display energy certificate(DEC)). **(Consultation Question 6- response d)**

6. **To ready the industry (metered) kWh/m²/yr targets need to be introduced in the 2020 review, with operational compliance as an optional route to compliance**. A trajectory of targets is recommended with 35kWh/m²/yr for all homes built from 2030 **(Consultation Question 7 – Response c)**

7. **Set a trajectory for Introducing requirements for Whole Life Carbon assessment and embodied carbon reductions**. Phase in requirements for assessment of whole life carbon, starting with larger developments in the 2020 review. Require all developments to assess and disclose whole life carbon impacts, and phase in targets for embodied carbon reduction reductions starting with larger developments in 2025 and introduce targets for all developments for reductions in embodied carbon in 2030.