

CIH response to The Future Homes Standard consultation

About CIH

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple - to provide housing professionals and their organisations with the advice, support and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world.

Further information is available at: www.cih.org

CIH contact:

John Perry, CIH policy adviser
john.perry@cih.org

Summary of our key points

This is a response to the consultation on the government's [Future Homes Standard](#).

CIH warmly welcomes the government's net zero emissions target and its recognition of the importance of the housing sector in achieving it. Following a meeting with the Chair of the Committee on Climate Change in 2019, CIH has joined 25 national organisations, including several other professional bodies, in agreeing to collaborate on an urgent and concerted response to achieving the 2050 target; to continue to work together to establish shared standards and practice; and to continue to develop professional resources, capacity and competencies within the sector capable of meeting that aim both domestically and internationally.

CIH therefore believes that high energy-efficiency standards for the housing stock are essential given that - as the government acknowledges - some 20% of greenhouse gas emissions are from domestic sources. Although not the subject of this consultation, CIH would also want to emphasise that tackling the energy efficiency of the existing housing stock is even more important than setting high standards for new build, given that most homes in existence now will still be in use when the new target takes effect in 2050.

CIH also wishes to see the issue of domestic carbon emissions dealt with within the context of better standards for new homes generally. While we welcome, for example, the work of the government's Building Better, Building Beautiful Commission, there is a need to revisit the wider review of building standards that took place under the coalition government, but which was never fully implemented.

CIH response to The Future Homes Standard consultation

In this context CIH support's the TCPA's proposal for a [Healthy Homes Act](#), which would set such wider standards and make it illegal to build without meeting them.

There is also little point in having higher standards of new construction if there are no standards for converting properties, which is the case for much permitted development (e.g. offices refurbished as flats). As the government's Building Better, Building Beautiful Commission has pointed out, we have 'inadvertently permissioned future slums.' As well as adopting new standards for new build, the government therefore needs urgently to address the issue of defective new dwellings being created through permitted development.

Our key points about The Future Homes Standard (FHS) are:

- CIH welcomes the government's commitment to introducing higher standards. Policy certainty is critical for the housing sector in order to plan for the long term and we welcome the clear roadmap to introducing the FHS.
- We also believe that it is correct that the FHS is implemented through the Building Regulations, although this puts a high premium on ensuring adherence to the standard and monitoring of its effectiveness in use. It carries major implications for training of and enforcement by building inspectors. Compliance, quality assurance and enforcement of the FHS will be critical to ensure there is no performance gap in achieving the required carbon reductions.
- CIH does, however, believe that the FHS is insufficiently ambitious. It will not in itself deliver net zero carbon and means that further work will be required to new homes built to the FHS.
- It is vital that, if such retrofit work is needed, that this is confined to aspects that are not part of the building fabric. High fabric standards are of critical importance and must be the guiding principle of the FHS. They should meet the higher standards that will be required in 2050.
- Heating services (radiators, piping, underfloor systems, etc.) must be capable of efficient conversion to low-temperature heating methods (such as heat pumps) over the period to 2050 if such systems are not installed at the outset.
- Ways should be considered to introduce the FHS more quickly, either by bringing forward the implementation date or having pilot compliance schemes or through other means that could be agreed with the industry.

The industry has already said that it believes the government should [lead from the front](#) if high standards are to be achieved by 2025, and the Chartered Institute of Housing agrees. Our concern is that the two options proposed represent just a 20%, or a 31%, reduction in emissions compared to the current standards for a new home. In a similar consultation the Welsh Government is proposing options leading to 37% or 56% reductions, at estimated extra costs of £5,900 or £8,300 respectively (compared with the FHS options costing £2,557 or £4,847). CIH calls for at least a 50% reduction in emissions compared with current standards.

CIH response to The Future Homes Standard consultation

Responses to detailed questions

CIH's responses to a number of the detailed questions posed in the consultation are as follows.

Q1: Do you agree with our expectation that a home built to the Future Homes Standard should produce 75-80% less CO2 emissions than one built to current requirements?

Response: No - 75-80% is too low a reduction in CO2

To respond to climate change all new buildings will need to operate at annual net zero carbon emissions by 2030, which means that by 2025 all new buildings must be *designed* to net zero. To ensure ALL new buildings meet net zero carbon, Approved Document Part L needs to become the legislative driver.

Headline reductions in the carbon intensity of new homes between the standards in 2013 and those proposed for 2020 are largely due to decarbonisation of the electricity grid, not higher energy efficiency standards. The FHS should be based on operational performance (the energy a building consumes in operation, rather than a reduction measured via a building model).

New homes should impose a minimal load on national energy supplies and thereby help the UK to *achieve* net zero carbon emissions.

Q2: We think heat pumps and heat networks should typically be used to deliver the low carbon heating requirement of the Future Homes Standard. What are your views on this and in what circumstances should other low carbon technologies be used?

Heat pumps are among the most appropriate way to deliver low carbon heat, provided they are designed and operated correctly to avoid high bills for the consumer.

What is meant by 'heat networks' needs to be made clear. There is an obvious difference between a network served by a gas combined heat and power (CHP) plant and a low carbon network served by fossil-fuel-free energy. Government should support innovative, low carbon solutions, but may also need to invest in these solutions so as to promote their adoption and widespread use.

Electrical heating cannot be classified as a 'low carbon' until the grid is low carbon. Direct electric heating is only appropriate for highly insulated dwellings with very low heating requirements (alongside domestic hot water).

Q3: Do you agree that the fabric package for Option 1 (Future Homes Fabric) provides a reasonable basis for the fabric performance of the Future Homes Standard?

CIH response to The Future Homes Standard consultation

Response: No - the fabric standard is not demanding enough

The more we can insulate our homes the less energy they will use for heating. We should not be designing and building homes that will need retrofitting in the future. A well-insulated and efficient building represents our greatest chance of meeting our climate commitments in new homes.

The Future Homes Standard 2020 does not promote a well-insulated building fabric due to the loss of the fabric energy efficiency standard (FEES). In fact, new homes could be less efficient in 2020 than under Building Regulations 2013. This will not provide a 'meaningful uplift to energy efficiency standards as a stepping stone to the Future Homes Standard'.

If there is a serious commitment to improving building fabric through the Future Homes Standard this must start now by setting 2020 minimum/limiting fabric standards or setting higher FEES standards.

Q4: When, if at all, should the government commence the amendment to the Planning and Energy Act 2008 to restrict local planning authorities from setting higher energy efficiency standard for dwellings?

Response: The government should not commence the amendment to the Planning and Energy Act

Currently, local authorities are able to set their own targets appropriate to their area; several have done so successfully, such as London, Nottingham and Bristol. So far, 245 local authorities have taken the decision to declare climate emergencies. Under the new regulations they will lose their ability to develop plans that respond to the emergency in an effective way.

The government needs to ensure that local authorities retain the ability to set their own targets above the FHS. Local authorities are well placed to assess the local needs of their area. Our ability to slow climate change depends on their ambitious response and their zero carbon plans. Government should therefore not be seeking to take this responsibility away but instead be supporting them.

The purpose of Building Regulations has been to set minimum standards; it is not their purpose to remove local authority powers to go beyond this minimum.

Q5: Do you agree with the proposed timings showing the Roadmap to the Future Homes Standard?

Response: No - the timings are not ambitious enough

A roadmap is essential but it is key that consultation on the future homes standard is carried out as soon as possible, so that developers and design teams can prepare themselves for the changes that are to come.

Q6: What level of uplift to the energy efficiency standards in the Building Regulations should be introduced in 2020?

The FHS 2020 does not promote a well-insulated building fabric. New homes will be less energy-efficient if important linked standards are withdrawn, as is proposed. It is vital to build homes that do not waste energy by leaking heat.

Under the proposals the current Fabric Energy Efficiency Standards would disappear. This risks a lowering of standards for building fabric, which includes insulation and airtightness. The use of an energy efficient heating system has the ability to mask fabric performance. It would be the wrong outcome if a new home in 2025 could be less insulated than a home under the 2013 building regulations. The government needs to strengthen requirements on how the building itself performs.

Failing to do this raises the spectre of new homes having to be retrofitted before 2050. This could be five times more expensive than getting things right now.

CIH wants to see homes expected to achieve at least a 50% reduction in carbon emissions.

Q7: Do you agree with using primary energy as the principal performance metric? Response: No - another measure should be the principal performance metric

We need a measure related to actual consumption which can be assessed by the home's energy meters.

Q8: Do you agree with using CO2 as the secondary performance metric? Response: No.

The objective for Part L should be the *minimising of energy demand* from new dwellings. As the electricity grid continues to decarbonise, and new dwellings move to using electricity as their only imported energy carrier, CO2 intensity will become increasingly meaningless.

Q9: Do you agree with the proposal to set a minimum target to ensure that homes are affordable to run? Response: Yes

But it should be noted that affordability varies across the country which is why local authorities are best placed to set requirements.

Q10: Should the minimum target used to ensure that homes are affordable to run be a minimum Energy Efficiency Rating? Response: Yes

CIH response to The Future Homes Standard consultation

Please note that further work is needed to improve Energy Efficiency Ratings as they are not a reliable measure of affordability.

Q11: Do you agree with the minimum fabric standards proposed in table 3.1?

Response: No, see response to question 3.

Q13: In the context of the proposed move to a primary energy metric and improved minimum fabric standards, do you agree with the proposal to remove the fabric energy efficiency target?

Response: No, see earlier responses.

Remaining questions: CIH does not have detailed responses to the remaining questions.

Chartered Institute of Housing
February 2020