

Rt Hon Robert Jenrick MP
Secretary of State
Ministry of Housing, Communities and Local Government
2 Marsham Street
London SW1P 4DF

18 February 2020

Future Homes Standard and proposals for tightening Part L in 2020

Dear Secretary of State,

We welcome your continued leadership of the Ministry for Housing, Communities and Local Government. As you know, this Parliament will define the UK's response to tackling climate change. Your department's actions are vital in that task.

Eliminating carbon emissions from our housing stock is one of the toughest challenges in reaching the UK's Net Zero target. It is vital that we do not make that challenge harder, or worsen our preparedness for rising global temperatures, by building sub-standard new homes.

We welcome the Future Homes Standard and your department's recent proposals to tighten part L of the building regulations. These are important steps, but they do not go far enough to reduce carbon emissions, or address the growing risks of overheating, flooding and water stress – key climate risks facing the UK. Stronger standards will serve future occupants better.

Most of the homes built now will still be standing in 2050. By then, the UK's Net Zero target requires an end to the burning of fossil fuels, including natural gas, in our homes. And by 2050, we expect the changing climate to make the temperatures experienced during the summer of 2018 the norm each year. New homes must be prepared for these twin climate challenges now. It obviously makes no sense to build homes that will need to be retrofitted again before 2050. Making a new home genuinely zero-carbon at the outset is around five times cheaper than retrofitting it later, and almost always will reduce residents' energy bills too.

We recommend the following specific proposals:

1. The full definition of the Future Homes Standard should be set now and legislated ahead of 2024 to give market certainty. Waiting until 2024 to legislate is likely to drive up compliance costs in the long run, given the history of the cancelled Zero Carbon Homes policy which left many investments stranded and weakened industry confidence. We also urge you to consider bringing forward the 2025 introduction date – we note that Scotland are due to introduce equivalent standards a year earlier.
2. There is a real concern that building fabric standards will be worse in the future if the standard for fabric efficiency (the Fabric Energy Efficiency Standard, or "FEES") is scrapped. Without an adequate replacement for FEES, homes could see bills which are 50% higher than under current standards. The regulations should ensure that homes are cheap to run as well as zero-carbon. By 2025 or earlier, *this must mean ultra-energy efficient* as well as zero-carbon. We published evidence last year which showed that limiting space heating

demands to Passivhaus levels (15 kWh/m²/yr) by 2025 at the latest is achievable and highly beneficial, but it requires setting out the ambition now rapidly to upskill the workforce.¹

3. We are sure that the intention was to rule out use of fossil fuels explicitly in the Future Homes Standard. However the proposed standard can be interpreted in such a way that onsite renewables like solar PV could act as an 'offset' to continued fossil fuel use. This is not a credible basis for the standard.
4. Where local authorities and cities wish to set more stringent or earlier targets they should be allowed to do so.
5. The Future Homes Standard must also set a framework for assessing the significant emissions in buildings materials. Without this, it is hard to see how the UK can significantly increase use of wood in construction or drive building materials efficiency. There is scope for reducing emissions from UK industries facing competitiveness risks.
6. We understand that your department will publish its second consultation very soon, including proposals for a new overheating standard for public and commercial buildings as well as homes. We agree that this is most important. Unless fabric efficiency, overheating and ventilation are considered jointly when retrofitting or building new homes, there is a high risk that poor ventilation and air-tightness will lead to overheating and poor indoor air quality. The implications for public health are significant. This issue has been highlighted in your department's own research and the risks will increase markedly as the climate continues to warm, as shown in the CCC's UK Climate Change Risk Assessment Evidence Report. There are also a range of wider issues outside of energy and thermal comfort that a good, sustainable home ought to have: water efficiency measures, green space and Sustainable Urban Drainage, and for properties at risk of flooding, Property Level Flood Resilience. Delays to addressing these issues will lock in many more homes that are unsuitable for the current and future climate.

None of the proposals will be effective unless fundamental issues around compliance and performance are also addressed. This means two things. First: driving a shift towards monitoring actual energy consumption so that by the time the Future Homes Standard is introduced, it can be done on an in-use energy performance basis. Second: broadening the current buildings safety work programme beyond its current focus on fire safety. The issues identified in the Hackitt review have much broader repercussions – indeed they lie at the root of the issues around the performance gap and poor quality build more generally.

The UK requires buildings which are fit for purpose. The construction sector must be made accountable for delivering outcomes, rather than the current design-for-compliance approach. This can build on proposals in the consultation for tightening planning loopholes – making sure that homes must comply with the latest standards unless they are substantially completed – along with further documentation and widespread testing. Clearly it must go hand in hand with adequate funding for Building Control Bodies.

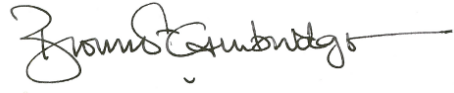
We would be happy to meet to discuss these issues and the wider challenges in decarbonising our buildings and ensuring they are prepared for climate change. If this is of interest, a meeting could be arranged through our Private Secretary, James Lees, at: private.secretary@theccc.org.uk.

¹ Currie and Brown for Committee on Climate Change, 2019, published as supporting evidence to Committee on Climate Change (2019) *UK Housing: Fit for the Future?*

With best wishes,

A handwritten signature in black ink, appearing to read 'Deben', with a horizontal line underneath.

Lord Deben
Chair, Committee on Climate Change

A handwritten signature in black ink, appearing to read 'Baroness Brown of Cambridge', with a horizontal line underneath.

Baroness Brown of Cambridge
Chair, Adaptation Committee, Committee
on Climate Change