

Future Homes Standards Consultation

Consultation response by Wildlife and Countryside Link
February 2020

Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 54 organisations to use their strong joint voice for the protection of nature. Our members campaign to conserve, enhance and access our landscapes, animals, plants, habitats, rivers and seas. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

This response is supported by the following Link members:

- *Bat Conservation Trust*
- *Butterfly Conservation*
- *Campaign for National Parks*
- *CPRE*
- *RSPB*

EXECUTIVE SUMMARY

To put the UK on course to meet both domestic and international climate change commitments, a step change is required to ensure all new and existing buildings are net zero: all buildings must be net zero carbon in operation before 2045, with new buildings meeting this standard by 2030.

After a damaging period of hiatus in terms of new build policy, we very much welcome this consultation. There have been no active UK Government policy measures in this area since the Zero Carbon Homes and Zero Carbon buildings policies were cancelled in 2015. Zero Carbon Homes legislation would have required all new build residential buildings to be zero carbon from 1 April 2016 and zero carbon buildings was intended to come into effect from 2019, so we urge the new Government to ensure that its welcome ambition in the Future Homes Standard consultation is now delivered as a matter of urgency.

In response to specific questions:

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 standards for dwellings?

a. In 2020 alongside the introduction of any option to uplift to the energy efficiency standards of Part L

b. In 2020 but only in the event of the introduction of a 31% uplift (option 2) to the energy efficiency standards of Part L

c. In 2025 alongside the introduction of the Future Homes Standard

d. The government should not commence the amendment to the Planning and Energy Act

Please explain your reasoning.

Link supports option d - the Planning & Energy Act should not be amended and local authorities should continue to have the freedom to set higher energy efficiency standards than in national Building Regulations/Standards. This will reflect declarations of a climate emergency by an increasing number of local planning authorities, with a number of them planning for net zero by much earlier than 2050. This ambition should be encouraged.

A forward trajectory for future uplifts to Building Regulations should be published to allow local authorities to set higher energy performance standards in line with future national requirements.

Continuing to allow local authorities to set higher energy efficiency standards should mean that investment and skills are related directly to future uplifts in national regulations. These future uplifts will be necessary to ensure all development is net zero.

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

a. No change

b. Option 1 – 20% CO2 reduction

c. Option 2 – 31% CO2 reduction (the government's preferred option)

d. Other

Please explain your reasoning.

Link supports option 2 as the minimum CO2 reduction level, although we would support a larger reduction to avoid the need to retrofit in the near future. In addition, we support measures proposed by the UK Green Building Council (UKGBC) to retain a fabric energy efficiency standard (FEES) as a metric of compliance in order to minimise energy demand and ensure an improvement in fabric performance compared with current levels.

Government should also, by 2025, tighten fabric energy efficiency standards in line with the Committee on Climate Change recommendations and introduce energy use intensity targets covering regulated and unregulated energy.

Government should set out a trajectory for tightening building regulations to ensure all new buildings in 2030 operate at net zero carbon for regulated and unregulated energy, whilst incorporating the existing advice on making provision for building reliant species such as bats and swifts.

An ambitious approach is essential if new development is to help us meet the urgent challenge of addressing the climate emergency. A clear trajectory will also support investment to meet the challenge.

Q65 Do you agree that the transitional arrangements for the energy efficiency changes in 2020 should not apply to individual buildings where work has not started within a reasonable period – resulting in those buildings having to be built to the new energy efficiency standard?

a. Yes – where building work has commenced on an individual building within a reasonable period, the transitional arrangements should apply to that building, but not to the buildings on which building work has not commenced

b. No – the transitional arrangements should continue to apply to all building work on a development, irrespective of whether or not building work has commenced on individual buildings

If yes, please suggest a suitable length of time for the reasonable period in which building work should have started. If no, please explain your reasoning and provide evidence to support this.

Option A - Yes

Link supports the UKGBC's call to introduce more stringent transitional arrangements from 2020 to ensure that homes not commenced within a reasonable period following building notice, initial notice or full plans must comply with the latest Part L. This 'reasonable period' should be 3 years to align with the planning cycle.

For questions or further information please contact:

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