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Elmhurst Energy's final response to:

Proposals for amendment of
Technical Booklet Guidance to Part F
(Conservation of fuel and power)

Prepared for: Department of Finance
(Northern Ireland)

Introduction

Elmhurst Energy are pleased that Department of Finance are seeking views on a consultation on 'Proposals for amendment of Technical Booklet Guidance to Part F (Conservation of fuel and power)' and as such we are delighted to respond to each question in turn.

The consultation asked 20 questions and we have answered them all below. We hope you find the responses considered and useful for taking 'Building Regulations for Part F' forward in a progressive manner.

Questions and Answers

1. Do you agree that it is sensible to prioritise the proposed amendments to Technical Booklets F1 and F2 guidance in advance of awaiting outcomes around the development of new UK NCMs, software and proposed building regulations uplifts?

Yes,

No. If no, please explain your reasoning.

Yes, the previous version was released in 2012 therefore an update is very much overdue. We do believe this would bring Northern Ireland closer in line with current UK standards and would result in a smaller step to bring Northern Ireland in line with the rest of the UK in the future. The evidence from the EPC lodgement data suggests the industry is already delivering new builds to a reasonable standard above and beyond the existing regulations.

Our preferred route would be for Northern Ireland to adopt the latest NCMs as soon as possible to ensure the latest carbon factors are used rather than rely on factors that are over ten years old.



2. Do you agree that additional manual checks of current software reports will be manageable in practice to demonstrate compliance in relation to the new requirements for: the betterment of the TER; an air-tightness performance no greater than $10 \text{ m}^3/(\text{h.m}^2)$ at 50Pa; and new U-value limits for building fabric (see paragraph. 5.59 on this below)?

Yes

No If no, please explain your reasoning and provide supporting evidence or alternative solutions on what alternative assessments should be introduced.

Our preferred route is for the methodology, software and outputs to be updated to reflect the changes, however, we agree manual checks can work as long as there is appropriate training and communication in place across the industry to ensure standards are being applied and maintained consistently.

3. Do you agree that the new guidance should apply from three months of publication of the guidance and from as early in 2022 as practicable?

Yes

No If no, please explain your reasoning and provide evidence for an alternative timescale.

Yes, the EPC data shows that industry in general is already applying similar standards. The changes must be clearly communicated to stakeholders and as long as there is appropriate training and communication in place across the industry we believe an implementation period of three months is viable.

4. Do you agree that Option 1 should be dismissed?

Yes

No If not, please provide the evidence and basis for why the current standards are appropriate and should be retained.



Yes, as a 'do nothing' proposal would not be beneficial to Northern Ireland and would be counterproductive.

5. Do you agree that the above proposals provide an appropriate interim step, which can be implemented quickly?

Yes

No If no, should they be more onerous or less onerous? Please explain your reasoning and provide supporting evidence for alternative suggestions, taking into account that further review is planned for 2022/23.

Yes, the suggested approach in our opinion is deemed both reasonable and appropriate. The EPC data suggests that new builds are already being built to a reasonable standard and the proposal would not be onerous.

6. Do you prefer Option 3 (40% betterment of the TER for houses, 25% for flats and 15% for new non-domestic buildings), or are the standards outlined in Option 2 (25% betterment of the TER for all dwellings and 15% for buildings other than dwellings) preferred?

Preference is for Option 1 (do nothing)

Preference is for Option 2

Preference is for Option 3

None of the above. If answering 'None of the above', please take into account and advise if proposals described here should be delayed or halted, in order to progress in line with your suggestions.

Option 3 (preference), this will bring Northern Ireland closer in line with the current UK standards.



7. Do you agree that the definition of 'flat' in regulation 2 provides a sufficiently clear discrimination of the building types to enable the different betterment rates to be applied to houses (40%) and flats (25%)?

Yes

No. If no, please explain your reasoning.

Yes, it aligns with Elmhurst's definition. This definition must have upmost clarity to avoid gaming of the system e.g. describing single storey detached dwellings as flats to have an easier route to compliance.

8. Do you agree that the proposed DER requirement for a 25% betterment of the TER should be applied to flats?

Yes

No. If no, should they be more onerous or less onerous? Please explain your reasoning and provide supporting evidence for alternative suggestions, taking into account that further review is planned for 2022/23 and that other building regulation proposals are likely to impact some flats.

Yes, this seems like the common sense approach. Due to the difficulties flats would have at achieving the 40% improvement figures.

9. Do you agree with the heat pump costing assumptions (see Annex A in the Regulatory Impact Assessment (RIA)), the 10% incident rate estimate for flats and the proposed level of uptake for heat pumps in houses, used in our modelling (see Annex C in RIA), appropriate?

Yes

No. If no, please provide the basis for an alternative rationale, which should apply.

No strong opinion.



10. Do you agree that the Department should make any necessary adjustment to attend to replicating the treatment of heat pumps proposed under Part L revisions in England for non-domestic buildings?

Yes

No. If no, how should the Department avoid overshooting England's requirements in this regard?

Yes – consistency with the treatment of heat pumps across the UK is beneficial to ensure that heat pumps are appropriately accounted for in energy assessments.

11. Do you have any data or modelling that would be useful in helping to assess the likely cost impacts on specific building types under the proposals?

Yes

No. If yes, please provide a summary of the information and if/how the Department may contact you to engage further.

No strong opinion.

12. Do you support the overall proposals for buildings other than dwellings, including proposed BER requirement for a 15% betterment of the TER for new non-domestic NZEB buildings?

Yes

No. If no, should the proposals be more onerous or less onerous? Please explain your reasoning and provide supporting evidence for alternative suggestions, taking into account that further review is planned for 2022/23.

Yes, we support this betterment as long as Northern Ireland commit to a further review in 2022/23 and move to the latest version of the NCM.



13. Do you agree that adopting the 2013 edition of the Non-Domestic Building Services Compliance Guide is worthwhile and would be at negligible cost to current practice?

Yes

No If no, please provide evidence to explain where this would be difficult or how cost assumptions should be revised.

Yes – by adopting the 2013 edition of the Non-Domestic Building Services Compliance Guide it will bring Northern Ireland in line with the rest of the UK, as well as ensuring figures are representative of industry standards.

14. Do you agree that the guidance revising the limiting U-values is worthwhile and workable for industry and enforcement?

Yes

No If no, please explain your reasoning.

Yes – revising the limiting U-values will help to address building fabric application and usage in buildings. As the approach has been used in the Republic of Ireland, it demonstrates that it is both worthwhile and workable for industry and enforcement.

15. Do you agree that the revisions to guidance on thermal bridging are a helpful clarification of current processes?

Yes

No If no, please explain your reasoning.

Yes the revision to guidance is helpful and we advocate for all thermal bridging assessments to be carried out by a competent individual registered with a competent persons scheme.



16. Do you agree with the removal of the default values for air-permeability of 15 m³/(h.m²) currently permitted?

Yes

No If no, please explain your reasoning.

Yes, Elmhurst agrees that the default value be removed. The dispensation for small developments was, presumably, to level the playing field because they were unable to sample properties. In our experience most small developments are fully tested anyway.

17. Do you agree that the overall proposed changes on fabric standards are helpful to support a 'fabric-first' approach?

Yes

No If no, please explain your reasoning and what should be done, taking into account that any significant review may delay implementation.

Yes, the overall proposed changes to support a 'fabric-first' approach. We believe this is the best approach to ensure Northern Ireland future proofs homes and buildings to be suitable for low carbon heating systems and new technology in the future. Taking a fabric first approach will also help reduce home owners fuel bills in future.

18. Do you agree that the guidance on non-export connections is helpful?

Yes

No If no, please explain your reasoning.

Yes, in conjunction with appropriate training and communication in place across the industry to ensure standards are being applied and maintained consistently.



19. Do you have any comment on our impact assessment and its key assumptions?

Yes

No. If no, please explain your reasoning and suggest alternatives calculations.

No strong opinion

20. Have you any suggestions or observations that do not fit into the preceding questions?

Yes

No If yes, please provide them with this response.

Elmhurst have a number of further suggestions or observations that we believe should be included within the Northern Ireland building regulations:

1. Ensure only accredited, competent and qualified assessors are completing and issuing building regulations compliance reports. This could be achieved by the requirement to lodge the compliance reports to a central government register ensuring a standardised process is carried out by competent individuals. This would allow for greater data collection for the future and improve transparency and consistency in the industry.
2. To move away from iSBEM as an interface with a view to invest funds spent on iSBEM to develop the SBEM methodology instead. In a similar way to SAP and RdSAP.
3. Keep the methodology up-to-date and as close to the truth as possible, ensuring that new technology and its implications are accounted for and reviewed on a regular basis.
4. Ensure and commit to changes to building regulations on a regular basis (i.e. every 2-3 years) ensuring carbon factors are reviewed at each regulation change and updated within the methodology.
5. Building Regulations need to be prepared to adopt new method of construction, evaluation and measurement. Pulse, developed by BTS Limited has undergone extensive independent investigation to prove its value. The portability, speed and ease of operation will mean that more intermediate



testing can be conducted ensuring that air tightness is considered at all stages of construction. Elmhurst supports new proven technology and certainly Pulse is a great British innovation, which has been proven to be an alternative to blower door technology.

6. Review and evaluate whether measures proposed by other regions in reducing and closing the performance/compliance gap.
7. Utilising a central repository for all data collected during the design and build of a building so that this is available to home and building owners for the future to allow them to make better decisions for their homes or buildings.

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