FINAL

Consultation Response

Building Regulations Part L 2025 Review

Prepared for: Welsh Government

Date: November 2025

Elmhurst Energy
16 St Johns Business Park,
Lutterworth, Leicestershire, LE17 4HB
01455 883 236

elmhurst energy

1. Introduction

Elmhurst Energy are pleased that Welsh Government are seeking Consultation on 'Part F, L and O of the Building Regulations' and as such we are delighted to respond to each question in turn.

The Consultation asked 72 questions and we have answered them all below. We hope you find the responses considered and useful for taking 'Part F, L and O of the Building Regulations' forward in a progressive manner.

2. Questions and Answers

Part L and Part F Standards for New Dwellings in 2025

1. **What level of uplift to the energy efficiency standards (i.e. improvements to the targets for performance metrics (see paragraph 2.42 for proposed metrics) in the Building Regulations should be introduced for the Part L 2025 standard?**

   a. Option 1 (the government's preferred option)

   b. Option 2

   c. Other

   Please explain your reasoning.

Elmhurst agrees that option 1 should form the basis of the uplift to the energy efficiency standards for new homes. This is broadly in line with the Future Homes Standard in England so reduces complexity for developers operating cross borders whilst still delivering a meaningful improvement over Part L 2022.

2. **Do you agree with the concerns raised in paragraph 2.7 regarding MVHR systems at this time?**

   a. Yes

   b. No

c. Unsure

Please explain your reasoning or how these concerns could be overcome in the future.

We agree that the performance of MVHR systems is a concern. The Welsh Government should insist on the independent testing by a member of a recognised competent persons scheme of any new ventilation systems to ensure adequate design and functioning and this should be presented to the building owner, and the occupants.

Additionally the airtightness score of 1.5 in option 2 is very challenging and the vast majority of dwellings do not currently demonstrate this level of airtightness.

3. **Do you agree that new dwellings and new non-domestic buildings should be permitted to connect to heat networks, if those networks can demonstrate they have sufficient low-carbon generation to supply the buildings' heat and hot water demand at the target CO2 levels for the Part L 2025 Standard?**

   a. Yes

   b. No

   c. Unsure

Please explain your reasoning.

4. **Do you agree that newly constructed district heating networks (i.e. those built after the Part L 2025 Standard comes into force) should also be able to connect to new buildings using the sleeving methodology? Do you agree that newly constructed district heating networks (i.e. those built after the Part L 2025 Standard comes into force) should also be able to connect to new buildings using the sleeving methodology?**

   a. Yes
   b. No
   c. Unsure

Please explain your reasoning.

5. **Do you agree with the proposed guidance on sleeving outlined for Heat Networks included in Approved Document L, Volume 1: Dwellings and Approved Document L, Volume 2: Buildings other than dwellings?**

   a. Yes
   b. No
   c. Unsure

Please explain your reasoning.

6. **Are there alternative arrangements for heat networks under the Part L 2025 Standard that you believe would better support the expansion and decarbonisation of heat networks?**

No

7. **Do you agree that new residential buildings served by communal heating systems should be compared to the proposed Part L 2025 notional standard with an individual ASHP?**

   a. Yes
   b. No
   c. Unsure

We do not believe this is a sensible approach for buildings served by communal heating systems. Currently we are unsure on how HEM will approach communal heating systems but in SAP they would be entered in the same way as a district heat network. SAP applies different calculation parameters for communal heating systems compared to individual dwelling heating systems, so to avoid any unintended consequences of this we believe the notional dwelling should use the communal heating system approach not the individual heating system approach.

8. **Should the notional dwelling heat loss calculation be based on a single weather location (Cardiff)?**

   a. Yes
   b. No
   c. Unsure

Please explain your reasoning.

The research undertaken shows for Wales the use of multiple weather locations does not have a significant impact on heat pump sizing. Therefore we agree that a single weather location is appropriate.

9. **Do you agree with the revised guidance in *Approved Document L, Volume 1: Dwellings* for consultation no longer including the average compliance approach for terraced houses?**

   a. Yes
   b. No
   c. Unsure

Please provide any evidence you have on the unintended consequences that could arise as a result of these changes.

Elmhurst believes that compared to blocks of flats the average compliance method was rarely used in terraced houses so we do not believe this will have a significant impact on the industry.

10. **Do you agree with the revised guidance in *Approved Document L, Volume 1: Dwellings* which states that you should not provide a chimney or flue when no secondary heating appliance is installed?**

    a. Yes
    b. No
    c. Unsure

Please explain your reasoning.

11. Do you agree with the proposed approach to determine U-values of windows and doors in new dwellings?

a. Yes
b. No
c. Unsure

Please explain your reasoning.

Elmhurst are not convinced that the small increase in accuracy advocated by the proposed approach will offset the impact across the industry this will cause. For energy assessors this will substantially increase the amount of time needed for data entry into HEM, which already is more complex than SAP 10.2. The removal of the 'SAP default' option for openings would then also present a problem for energy assessors where the u-value required by the proposed approach is not available.

Additionally for manufacturers this will require an extensive program of testing to derive the u-values of their units at considerable cost especially for smaller manufacturers. This may not be achievable in the time available before the Part L 2025 commences.

12. Do you consider that a Part L requirement for renewable energy (with guidance given in Approved Document L) should be implemented rather than being included in the notional dwelling specification for new dwellings?

a. Yes
b. No
c. Unsure

Elmhurst believes that there should be a functional requirement for renewable electricity generation with Building Regulations, and an amount of PV within the notional dwelling as well. The functional requirement should set a minimum amount of electricity generation with the notional dwelling setting a more ambitious amount. This would ensure all dwellings have renewable electricity generating technologies installed, but also all trading within HEM assessments against the notional amount should a house design not be able to meet this.

Elmhurst would also stress that any potential criteria for exemptions must be clearly set out with no ambiguity that could be exploited.

13. Do you have any information you would like to provide on the dwellings built to the Part L 2025 Standard using curtain walling?

No further information to add.

14. Do you agree with the replacement of the Dwelling Energy Efficiency Rate with the Energy Use Intensity?

a. Yes

b. No – the Dwelling Energy Efficiency Rate should be retained

c. No – an alternative metric should be used (please provide details)

d. No – the Dwelling Energy Efficiency Rate should be removed with no additional metric added

Elmhurst does not agree that using EUI is suitable for Building Regulations. Introducing unregulated energy use into the energy efficiency standards could result in unintended consequences and behaviours in the aim of achieving compliance. It is not within the remit of the builder or energy assessor to advocate for the number and type of appliances that forms the basis of unregulated energy use in new homes. Additionally using EUI alongside Primary Energy is confusing.

Elmhurst would advocate the introduction of a new Welsh Fabric Energy Efficiency Standard (FEES), similar to that used in England. This would in our opinion ensure a fabric first approach is taken to the construction of new homes. We do here reports of developers constructing homes to relatively poor fabric standards and offsetting these with low carbon technologies to achieve compliance. In order for heat pumps to operate efficiently they must be tied to a good level of building fabric performance which a FEES metric will deliver.

15. **Do you agree that the Home Energy Model should be adopted as the approved calculation methodology to demonstrate compliance of new dwellings with the Part L 2025 Standard in Wales?**

a. Yes
b. No
c. Unsure

Please explain your reasoning.

Elmhurst agrees that when complete, the Home Energy Model should be the sole approved calculation methodology use to demonstrate compliance with Part L 2025. However currently there is no set date for when HEM will be completed, when conventions will be issued, when the PCDB will be ready and no information on if current OCDEAs will be required to upskill to operate in HEM. Our answer to question 16 supports the use of SAP until HEM is deemed ready.

Elmhurst would also highlight that homes are currently being sold off plan via the use of Predicted Energy Assessments. These documents should only be able to be produced by accredited On Construction Domestic Energy Assessors, and lodged onto a register as per the model for EPCs. This would allow these reports to be visible and therefore subject to quality assurance audit thus ironing out any issues at an appropriate stage in the process i.e. before construction commences. Currently accreditation schemes perform quality assurance auditing on EPCs and if issues are found it is not possible to change the building design at this point thus could contribute to the performance gap.

16. **Do you agree that SAP should continue to be used to demonstrate compliance with Part L 2025 as an interim measure if the final version of HEM is not completed by the proposed coming into force date?**

a. Yes
b. No
c. Unsure

Please explain your reasoning.

Elmhurst agrees that using SAP to demonstrate compliance until HEM is deemed complete is a sensible move that will smooth the transition to Part L 2025. Currently there is no set date for when HEM will be completed, when conventions will be issued, when the PCDB will be ready and no information on if current OCDEAs will be

required to upskill to operate in HEM. Until these areas are clarified we do not believe HEM is ready to be the sole methodology use for demonstrating compliance with Part L 2025.

17. Do you agree with the proposed changes to minimum building services efficiencies and controls set out in Section 6 of *draft Approved Document L, Volume 1: Dwellings*?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

18. Do you agree with the proposal to include additional guidance around heat pump controls for dwellings, as set out in Section 6 of *draft Approved Document L, Volume 1: Dwellings*?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

19. Do you agree that operating and maintenance information should be fixed to heat pump units in new dwellings?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

20. **Do you think that the operating and maintenance information set out in Section 10 of draft Approved Document L, Volume 1: Dwellings is sufficient to ensure that heat pumps are operated and maintained correctly?**

    a. Yes
    b. No
    c. Unsure

If No, please explain your reasoning.

21. **Do you agree with the proposed changes to Section 4 of *draft Approved Document L, Volume 1: Dwellings*, designed to limit heat loss from low carbon heating systems?**

    a. Yes
    b. No
    c. Unsure

If No, please explain your reasoning.

22. **Do you agree with the proposed sizing methodology for hot water storage vessels for new dwellings?**

    a. Yes
    b. No
    c. Unsure

If No, please explain your reasoning.

23. **Do you agree with the proposed changes to *Approved Document F, Volume 1: Dwellings* to improve the installation and commissioning of ventilation systems?**

    a. Yes

b. No
c. Unsure

If No, please explain your reasoning.

The Government should insist on the independent testing by a member of a recognised competent persons scheme of any new ventilation systems to ensure adequate design and functioning and this should be presented to the building owner, and the occupants.

24. Do you think the guidance on commissioning hot water storage vessels in Section 8 of *draft* Approved *Document L, Volume 1: Dwellings* is sufficient to ensure they are commissioned correctly?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

25. Are you aware of any gaps in our guidance around commissioning heat pumps, or any third-party guidance we could usefully reference?

a. Yes
b. No
c. Unsure

If Yes, please provide further details.

26. Do you think the guidance for commissioning on-site electrical storage systems in Section 8 of *draft Approved Document L, Volume 1: Dwellings* is sufficient to ensure they are commissioned correctly?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

Part L, F and O Standards for Existing Dwellings in 2025

27. Do you agree with proposed changes to Approved Document L, Volume 1: Dwellings and Approved Document F, Volume 1: Dwellings to (a) clarify the options for certifying fixed building services installations and (b) set out available enforcement options where work does not meet the required standard?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

28. Do you agree with the proposed changes to minimum building services efficiencies and controls set out in Section 6 of *draft Approved Document L, Volume 1: Dwellings*?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

29. Do you agree with the proposal to include additional guidance around heat pump controls for dwellings, as set out in Section 6 of *draft Approved Document L, Volume 1: Dwellings*?

a. Yes
b. No

c. Unsure

If No, please explain your reasoning.

30. Do you agree that operating and maintenance information should be fixed to heat pump units in existing dwellings?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

31. Do you think that the operating and maintenance information set out in Section 10 of *draft Approved Document L, Volume 1: Dwellings* is sufficient to ensure that heat pumps are operated and maintained correctly?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

32. Do you agree with the proposed changes to Section 4 of draft Approved Document L, Volume 1: Dwellings, designed to limit heat loss from low carbon heating systems?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

33. **Do you agree with the proposed sizing methodology for hot water storage vessels for new dwellings?**

    a. **Yes**
    b. **No**
    c. **Unsure**

If No, please explain your reasoning.

34. **Do you agree with the proposed changes to *Approved Document F, Volume 1: Dwellings* to improve the installation and commissioning of ventilation systems?**

    a. **Yes**
    b. **No**
    c. **Unsure**

If No, please explain your reasoning.

35. **Do you agree with proposed changes to *Approved Document F, Volume 1: Dwellings* to (a) provide guidance for a requirement to provide falls for horizontal extract ducting, and condensate traps with drainage for vertical ducting to discharge condensation water that may accumulate within the ductwork, and (b) include an explanatory diagram to reinforce the principles of the requirement?**

    a. **Yes**
    b. **No**
    c. **Unsure**

    If No, please explain your reasoning.

36. **Do you think the guidance on commissioning hot water storage vessels in Section 8 of *draft* Approved *Document L, Volume 1: Dwellings* is sufficient to ensure they are commissioned correctly?**

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

37. Do you think the guidance for commissioning on-site electrical storage systems in Section 8 of *draft Approved Document L, Volume 1: Dwellings* is sufficient to ensure they are commissioned correctly?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

38. Do you agree with proposed changes to Approved Document L, Volume 1: Dwellings and Approved Document F, Volume 1: Dwellings to (a) clarify the options for certifying fixed building services installations and (b) set out available enforcement options where work does not meet the required standard?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

39. Do you agree with the proposal to introduce a requirement to install renewable technology when a dwelling is significantly extended?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

40. Do you agree with the proposed definition for a 'significant extension'?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

41. Do you agree with the methods proposed for the simple and flexible approaches?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

We agree with the proposed solar photovoltaics option however the solar thermal option should also include a minimum capacity. Without setting a minimum capacity very small solar thermal arrays could be installed to meet the requirement but in practice will offer very little improvement to the home.

42. Do you agree with the proposed exemptions?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

43. Are there any other aspects of the Building Regulations or associated Approved Document guidance, for example on safety or other building standards, which should be reviewed or updated to account for this new proposal?

Nothing to add

44. Do you agree with the proposal to extend Part O of the Building Regulations to capture works on existing dwellings?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

45. Do you agree with the proposal to introduce additional commentary in Approved Document O: overheating on new extensions to existing dwellings where there is a relatively high percentage of glazing in the extension?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

Extensions are frequently overglazed, which could significantly increase the risk of overheating in these dwellings. To ensure occupant comfort and mitigate this risk, we believe it should be a mandatory requirement to carry out an overheating assessment for all extension works, regardless of size or glazing ratio.

46. Do you agree with the proposal to introduce new guidance in Approved Document O: overheating on replacement of window(s) in highly glazed flats?

a. Yes

b. No
c. Unsure

If No, please explain your reasoning.

47. Do you agree with the proposal to introduce new guidance in Approved Document O: overheating on loft conversions to habitable rooms with new window(s) / rooflight(s) / dormer window(s)?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

Part L Standards for New Non-Domestic Buildings in 2025

48. What level of uplift to the energy efficiency standards in the Building Regulations should be introduced in 2025?

a. No change
b. Option 1 – 78% CO2 reduction
c. Option 2 – 94% CO2 reduction
d. Other

Please explain your reasoning.

Option 2 best aligns with Welsh net-zero ambitions and the direction of recent UK/NCM updates to fuel and CO_2 factors. A 94% target drives design decisions towards fabric-first, low-energy services and low-carbon heat, reducing the likelihood of lock-in to fossil fuel plant which would require costly retrofit. To be deliverable it must be accompanied by clear transitional guidance (notional building specs, approved heat pumps/renewable assumptions), staged compliance routes and increased support for verification and commissioning.

49. Do you agree with the methodology outlined in the NCM modelling guide for the Part L 2025 Standard?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning.

50. Please provide any further comments on the cSBEM tool which demonstrates an implementation of the NCM methodology.

Elmhurst welcomes the improvements and updates demonstrated in the latest version of cSBEM, including developments such as bivalent lighting and other refinements that enhance accuracy and usability. We are supportive of any future updates to the tool and strongly recommend that these discussions continue to actively involve the Conventions Group as a sounding board. Their ongoing engagement will help ensure consistency, clarity and practical alignment across industry practice.

51. Please provide any further comments on the research documents provided alongside the cSBEM tool and which support the development of the NCM methodology, SBEM and iSBEM.

No further comments

52. Do you agree with the proposed changes to minimum building services efficiencies and controls set out in Section 6 of *draft Approved Document L, Volume 2: Buildings other than dwellings*?

a. Yes
b. No
c. Unsure

The proposed tightening of minimum efficiencies is appropriate and supports energy reduction objectives. However :

- Ensure minimums are realistic for small/ bespoke plant and provide transitional/allowance routes where market availability is limited.
- Require independent verification/commissioning evidence for installed efficiencies and controls.
- Provide clear guidance on acceptable product standards for systems not covered by Ecodesign.

53. Do you agree with the proposed change in the requirements for when BACs are required in buildings?

a. Yes
b. No
c. Unsure

Lowering the trigger from 290 kW to 180 kW for heating/AC systems is justified, benefits (energy savings and control enabling) outweigh costs and the IA indicates net benefit. However, the guidance should:

- Clarify expected minimum BAC capabilities (e.g., scheduling, temperature setback, fault detection) and interoperability requirements;
- Include commissioning and handover documentation requirements for BACs and ensure building owners receive training/operational guidance; and
- Provide an implementation lead time to allow procurement and skills ramp-up.

54. Do you agree with the proposed guidance on the insulation standard for building heat distribution systems in *Approved Document L, Volume 2: Buildings other than dwellings*?

a. Yes
b. No
c. Unsure

Proposed references to CIBSE CP1 for multi-dwelling heat distribution and BS 5422 for secondary systems are appropriate and will reduce distribution losses. Ensure guidance clarifies insulation thickness selection for continuous vs intermittent operation and includes commissioning checks (surface temperature readings, insulation integrity).

55. Do you agree that the current guidance for buildings with low energy demand which are not exempt from the Building Regulations, as described in *Approved Document L, Volume 2: Buildings other than dwellings* should be retained without amendment?

a. Yes
b. No
c. Unsure

Current Approved Document L guidance for low energy non-domestic buildings appears appropriate; retain but monitor to ensure it remains compatible with the notional building approach and any future changes to occupancy/usage typologies. Consider adding examples/case studies to aid practitioners.

56. Do you agree that lifts, escalators and moving walkways in new buildings (but not when installed within a dwelling) should be included in the definition of fixed building services?

a. Yes
b. No
c. Unsure

Including these technologies in the definition of fixed building services is appropriate given they can represent a significant share of peak energy (consultation cites up to ~40% in some cases). This change allows minimum efficiency/commissioning standards to be required (e.g. BS EN ISO 25745 testing/commissioning) and will drive procurement of more efficient equipment and better maintenance information for owners. Guidance should provide clear measurement/commissioning checks and dataset inputs for NCM where feasible.

57. Do you agree with the proposed guidance for passenger lifts, escalators and moving walkways in *draft Approved Document L, Volume 2: Buildings other than dwellings*?

a. Yes
b. No
c. Unsure

The proposed guidance (minimum standards, commissioning/testing under BS EN ISO 25745 and owner maintenance information) is an appropriate way to address an existing modelling gap (these services are not in the notional building). Ensure the guidance includes realistic measurement/verification steps for in-use energy and expectations for lifecycle maintenance.

58. Do you have any further comments on any other changes to the proposed guidance in draft Approved Document L, Volume 2: Buildings other than dwellings?

a. Yes (please provide comments)
b. No
c. Unsure

- Strengthen commissioning and evidence requirements for fixed building services (tie to cSBEM inputs and as-built evidence).
- Provide worked examples of notional building specifications for typical non-domestic building types (offices, retail, warehouses, schools) to reduce interpretation variation.
- Clarify when alternative compliance routes (fabric standards + measured performance) are acceptable and how to evidence them.

Part L Standards for Existing Non-Domestic Buildings in 2025

59. Do you agree with the introduction of photographic evidence as a requirement for producing the as-built energy assessment for new non-domestic buildings?

a. Yes
b. No
c. Unsure

Mandating time-stamped & geotagged photographic evidence for high-risk elements (similar to the 2022 dwellings approach) is sensible to improve the alignment of modelled vs as-built performance and address the performance gap. Guidance should: specify a list of mandatory elements (insulation runs, plant installations, service segregation, lighting), and acceptance criteria; ensure data privacy controls; and integrate with the compliance/inspection workflow.

60. Do you agree with the proposed changes to minimum building services efficiencies and controls set out in Section 6 of *draft Approved Document L, Volume 2: Buildings other than dwellings*?

a. Yes
b. No
c. Unsure

Uplifting minimum efficiencies for existing buildings is important to reduce in-use carbon. However, for existing stock the guidance must recognise practical constraints (retrofit standards such as PAS2038, access, plant replacement cycles). Elmhurst recommend a staged approach with clear cost-effective thresholds, opt-out/alternative measures where impractical, and mandatory commissioning/verification when upgrades are installed.

61. Do you agree that the current guidance for buildings with low energy demand which are not exempt from the Building Regulations, as described in *Approved Document L, Volume 2: Buildings other than dwellings* should be retained without amendment?

a. Yes
b. No
c. Unsure

Elmhurst supports retaining the current guidance, but believe it could go further: as regardless of their energy demand, all buildings should be required to undergo a formal energy assessment and the production of a lodged EPC. Low energy demand does not negate the value of an EPC: it provides transparency for building owners and occupiers, supports compliance, enables future retrofit planning, and maintains consistency across the non-domestic assessment framework.

Legislative changes to the energy efficiency requirements

62. Do you have any comments on the changes to the proposed guidance in *draft Approved Document L, Volume 2: Buildings other than dwellings*?

a. Yes (please provide comments)
b. No

c. Unsure

- Ensure transitional timings are explicit and provide sufficient lead time for industry skills, supply chain and testing/commissioning capacity (especially for heat pumps, BACs and specialist services).
- Align Part L changes with broader Welsh policy (Heat Strategy) and provide funding/skills support channels where needed.
- Require stronger post-occupancy evaluation and feedback loops so future Part L revisions are evidence-led.

63. Do you agree that Part L1 of Schedule 1 should be amended, as above, to require that reasonable provision be made for the conservation of energy and reducing carbon emissions?

a. Yes
b. No
c. Unsure

Please explain your reasoning.

64. Do you agree that regulations 25A and 25B will be redundant following the introduction of the Part L 2025 Standard and can be repealed?

a. Yes
b. No
c. Unsure

Please explain your reasoning.

Impact Assessment

65. The Impact Assessment makes a number of assumptions on fabric/services/ renewables costs, new build rates, phase-in rates, learning rates, etc for new dwellings. Do you think these assumptions are fair and reasonable?

a. Yes
b. No
c. Unsure

If No, please explain your reasoning and provide evidence to support this.

66. **Overall, do you think the impact assessment is a fair and reasonable assessment of the potential costs and benefits of the proposed options for new dwellings?**

a. Yes
b. No
c. Unsure

If No, please explain your reasoning and provide evidence to support this.

Transitional Arrangements

67. **Which option describing the timescale between laying the regulations and them coming into force for the Part L 2025 Standard do you prefer?**

a. Option 1 (6 months)
b. Option 2 (12 months)

Please use the space provided to provide further information and/or alternative arrangements.

Should SAP be used alongside the Home Energy Model to demonstrate compliance with the energy efficiency standards then Elmhurst suggests option 1 would give sufficient time for the industry to prepare for Part L 2025.

It is important we move to Part L 2025 as quickly as possible to ensure as many homes as possible are net zero ready.

68. Will the changes to Building Regulations proposed in this consultation lead to the need to amend existing planning permissions? If so, what amendments might be needed and how can the planning regime be most supportive of such amendments?

a. Yes
b. No
c. Unsure

Please explain your reasoning.

69. Do you agree that the 2010 and 2014 energy efficiency transitional arrangements should be closed down, meaning all new buildings that do not meet the requirements of the 2025 transitional arrangements would need to be built to the Part L 2025 standard?

a. Yes
b. No
c. Unsure

Please explain your reasoning.

Elmhurst fully supports the Government in closing the older transitional arrangements as quickly as possible and would support a smaller transitional period of 6 months for any sites being built to Part L 2006, 2010 or 2014 regulations.

Elmhurst is aware that many homes are still being built out to Part L 2010 and 2014 as many of our members are actively using our older SAP software products to create compliance reports and lodge EPCs for these regulations. Due to the age of these software products it is becoming unviable to maintain them to modern security standards and could result in a position where there is no available software solution for calculations against these older versions of Part L.

Additionally in order to ensure as many homes as possible are built to the Part L 2025 the sunsetting of the older arrangements will support this.

70. What, in your opinion, would be the likely effects of the proposals on the Welsh language? We are particularly interested in any likely effects

on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

Do you think that there are opportunities to promote any positive effects?

No opinion

Do you think that there are opportunities to mitigate any adverse effects?

No opinion

71. In your opinion, could the proposals be formulated or changed so as to:

- **have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or**

No opinion

- **mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?**

No opinion

72. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Elmhurst firmly believe that energy efficiency education should be made a priority. The development of the Home Energy Model (and associated SBEM and RdSAP methodologies) must reflect the impact of new proven technologies and innovation, and the changes in power generation that impact on carbon emissions and prices. This is especially true when it comes to the energy required to cool buildings. While using energy here should never be seen as a substitute for good design, it should be included within regulated energy calculation. The models need continual investment to ensure they remain the best tools for the year-round assessment of all UK buildings. However, 'design' is only part of the picture when it comes to the impact of energy regulation.

It is time to recognise the importance of measuring actual energy consumption. Using the technology available, such as smart meters and Elmhurst's Measured

Energy Performance technology, we now can measure the real-time energy consumption of all buildings, calculating the heat loss through a building's walls, floor and roof. When combined with EPCs, this gives us a highly accurate picture of what is actually happening in a building. This has huge benefits for checking compliance with Building Regulations in new homes construction or retrofit, and in proving the efficacy of our national energy modelling tools such as SAP, HEM and SBEM. Additional technologies, such as tools to measure U-Values, airtightness testing and thermal imagery are also powerful ways to help test assumptions and validate and improve energy assessment methodologies.

Contact Details

Should you require any further clarification, please contact us at:

Elmhurst Energy
16 St Johns Business Park,
Lutterworth,
Leicestershire,
LE17 4HB

01455 883 250

enquiries@elmhurstenergy.co.uk

www.elmhurstenergy.co.uk

elmhurst energy