



Elmhurst Energy's final response to:

The Future Buildings Standard

Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for non-domestic buildings and dwellings; and overheating in new residential buildings.

Prepared for: MHCLG



APRIL 2021

Introduction

Elmhurst Energy are pleased that MHCLG are consulting on 'The Future Buildings Standard' and as such we are delighted to respond to each question in turn.

The consultation asked 132 questions related to domestic and non-domestic buildings and we have answered them below. We hope you find the responses considered and useful for taking energy efficiency and building energy assessment forward in a progressive manner.

Questions and Answers

Q1) Our aim is that buildings constructed to the Future Buildings Standard will be capable of becoming carbon neutral over time as the electricity grid and heat networks decarbonise.

Do you agree that the outline of the Future Buildings Standard in this chapter meets this aim?

Yes – a conscious effort to implement low-carbon technologies/ fuels will help new non-domestic buildings meet the government's targets and this can be achieved through the proposed Future Buildings Standard

Elmhurst would advise the introduction of another step in 2023, in between the 2021 Interim uplift to Part L and the 2025 Future Buildings Standard. This step would allow us to discover and review whether the changes implemented in 2021 are being met and that the technology is present and being utilised to ensure a smooth transition to the 2025 standards.

Q2) We believe that developers will typically deploy heat pumps and heat networks to deliver the low carbon heating requirement of the Future Buildings Standard where practical.

What are your views on this and in what circumstances should other low carbon technologies, such as direct electric heating or hydrogen, be used?

Heat pumps are proven to increase energy efficiency and lower consumption, therefore their deployment will play a crucial role in achieving the Future Buildings Standard. However the overall building should remain the sole focus for achieving compliance.

Previous experiences with heat networks have been mixed and some have become ineffective and unreliable. Development of modern networks, powered by green energy, should be explored. Certainly regulation should not stifle innovation. It is essential that 'proven' innovation is recognised within the SBEM methodology by keeping the NCM as close to the truth as possible and up-to-date.

Q3) Do you agree that some non-domestic building types are more suitable for low carbon heating and hot water, and that some non-domestic building types are more challenging?

Elmhurst would largely agree that low carbon technologies favour a particular stock of existing buildings, and a larger proportion of new builds. Offices and retail units can benefit from low carbon technologies like, heat pumps and heat networks, however buildings that are mainly used for industrial and storage distribution purposes may not be suitable for low carbon heating.

We would hope to see the improvement of technology over time to incorporate all buildings and lower their energy demand. However, if the technology does not become available, there could be unintended consequences that leads to non-compliance.

Q4) Do you agree with the allocation of building types to space and water heating demand types, as presented in Table 2.1 of this consultation document?

Elmhurst would agree – no strong opinion.

Q5) We would like to introduce the Future Buildings Standard for all buildings as quickly as possible. When do you think the Future Buildings Standard should introduce low carbon space heating for buildings with Type 1 or Type 2 demand (buildings that have space heating demand more suitable for heat pumps)?

a) 2025 – our proposed date

b) Another date (please specify)

A – 2025. Based on the interim uplift timescales and the implementation in late 2021, we believe that the proposed date of 2025 should allow developers to phase out the use of fossil fuels through applying the NCM to model non-domestic buildings.

However, Elmhurst would advise the introduction of another step in 2023, in between the 2021 Interim uplift to Part L and the 2025 Future Buildings Standard. This step would allow us to discover and review whether the changes implemented in 2021 are being met and that the technology is present and being utilised to ensure a smooth transition to the 2025 standards. This would also allow for a regular review of the primary energy and carbon factors to ensure the assessment methodology is as up to date as possible.

We appreciate the dedication to improve heating and water efficiencies through low carbon technology. However to improve the energy efficiency of a building we must assess the overall building. The NCM represents this and should be utilised to assess the overall building and the advantages of low-carbon technologies within that, like the use of heat pumps.

Q6) We would like to introduce the Future Buildings Standard for all buildings as quickly as possible. When do you think the Future Buildings Standard should introduce low carbon *space heating* for buildings with Type 3 demand (buildings that have space heating demand less suitable for heat pumps)?

a) 2025 – our proposed date

b) Another date (please specify)

A 2025 – Elmhurst would agree that the proposed changes should be implemented to cover all building types and their energy demand for the same date in 2025. The interim uplift should allow developers to phase out fossil fuels in all commercial building types.

However, the introduction of another step could reinforce the urgency to adopt low carbon technologies and the phasing out of fossil fuels. This would motivate and assure that the low-carbon technology industry is ready and prepared for all 3 types of demand buildings and their adoption of the Future Buildings Standard.

Q7) We would like to introduce the Future Buildings Standard for all buildings as quickly as possible. When do you think the Future Buildings Standard should introduce low carbon *water heating* for buildings with Type 1 or Type 3 demand (buildings that have water heating demand more suitable for point-of-use heaters or heat pumps)?

a) 2025 – our proposed date

b) Another date (please specify)

A – 2025. Elmhurst would advise the introduction of another step in 2023, in between the 2021 Interim uplift to Part L and the 2025 Future Buildings Standard. This step would allow us to discover and review whether the changes implemented in 2021 are being met and that the technology is present and being utilised to ensure a smooth transition to the 2025 standards.

Q8) We would like to introduce the Future Buildings Standard for all buildings as quickly as possible. When do you think the Future Buildings Standard should introduce low carbon water heating for buildings with Type 2 demand (buildings that have water heating demand less suitable for point-of-use heaters or heat pumps)?

a) 2025

b) Another date (please specify)

A – 2025. Elmhurst would advise the introduction of another step in 2023, in between the 2021 Interim uplift to Part L and the 2025 Future Buildings Standard. This step would allow us to discover and review whether the changes implemented in 2021 are being met and that the technology is present and being utilised to ensure a smooth transition to the 2025 standards.

Interim uplift to Part L standards for non-domestic buildings

Q9) We would welcome any further suggestions, beyond those provided in this consultation, for improving the modelling process; Part L and Part F compliance; and the actual energy performance of non-domestic buildings.

We feel that there are a variety of changes that would improve the modelling process, which are detailed below;

1. To move away from iSBEM as an interface with a view to invest funds spent on iSBEM to develop the SBEM methodology instead.
2. Keep the methodology up-to-date and as close to the truth as possible, ensuring that new technology and its implications is accounted for and reviewed on a regular basis.
 - a. Such as the ability to add BACS as a credit towards having an effect on the actual primary energy usage.
3. A gradually step process in 2023, in between the 2021 Interim uplift to Part L and the 2025 Future Buildings Standard. This step would allow us to discover and review whether the changes implemented in 2021 are being met and that the technology is present and being utilised to ensure a smooth transition to the 2025 standards.
4. Ensure accredited, competent and qualified assessors are completing new build compliance checks. This could be achieved by the requirement to lodge the BRUKL 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.

5. To use Part L and Part F in conjunction with one another in any transition period

Q10) What level of uplift to the energy efficiency standards for non-domestic buildings in the Building Regulations should be introduced in 2021?

- a) Option 1 – average 22% CO2 reduction
- b) Option 2 – average 27% CO2 reduction (this is the Government’s preferred option)
- c) No change
- d) Other level of uplift (please specify)

Option 2 – Elmhurst believes this option provides a fabric first approach, which we think is the most important and necessary step to reduce heat losses before looking at more efficient water and space heating. If the fabric is not improved first then there could still be large heat losses that counteracts the positive effect of energy efficient services. We should follow the whole building approach and utilise the NCM in providing a full energy assessment of a building.

Q11) Do you agree with the way that we are proposing to apply primary energy as the principal performance metric?

No – Elmhurst firmly agree that measuring energy demand should be a principal metric, however we would recommend that this be a measurement of the true energy demand for the building. This make use of the outputs already being calculated within SBEM and encompasses the NCM. Using the energy demand metric allows for a focus on the building only.

Q12) Do you agree with using CO₂ as the secondary performance metric?

Yes – CO₂ should stay as a performance metric as it necessary to work out a buildings carbon emissions in order to view an overall performance of a building, rather than just looking at their energy demand.

Q13) Do you agree with the approach to calculating CO₂ and primary energy factors, referred to in paragraph 3.5.7 of this consultation document?

The SBEM methodology should always be focussed on the truth. We believe the factors should be reviewed every three years to keep the methodology up-to-date and as close to the truth as possible.

Q14) Do you agree with the proposals for natural gas being assigned as the heating fuel for any fuels with a worse CO₂ emission factor than natural gas?

Yes - this adopts a pragmatic approach which accounts for non-domestic buildings that may not be able to allocate an electric only fuel source. Buildings that already use high-carbon fuel types should be compared to the most efficient high-carbon fuel type to try and reduce possible complications in achieving building compliance.

This method is more inclusive as it doesn't push the bar higher than necessary for buildings that can't achieve the best case scenario of using electricity. It poses a balanced assessment and more representative energy performance rating.

Q15) Do you agree with our proposal of using a hybrid electric/heat pump heating system in the notional building when electricity is specified as a heating fuel?

Yes - If we are to achieve the government's targets then building's using electricity as a fuel source should be heavily influenced to adopt low-carbon technologies that utilise electricity. Proposing these technologies for the notional building will acknowledge their presence as being great services that reduce a buildings energy consumption. Overall this will help to achieve compliance and lower energy use over time.

Q16) Do you agree with the proposal for the treatment of domestic hot water in the notional building?

Yes - some buildings have a large hot water demand, which current technology cannot achieve through low-carbon technologies. These buildings must be referenced to a building that also has high hot water demand. However this could lead to unintended consequences

Other buildings with low hot water demand should be persuaded to use point of use HWS, as they have a lower primary energy demand and CO2 impact than systems with storage. Using this in the notional building for certain types of properties will help designers to allocate their resources towards lower carbon and low energy use.

Q17) Do you agree with the proposal for connecting to an existing heat network, as presented in the draft NCM modelling guide?

- a) Yes
- b) No, they give too much of an advantage to heat networks
- c) No, they do not give enough of an advantage to heat networks
- d) No, I disagree for another reason

A – Yes, no strong opinion, as long as the proposals are proven and rely on the NCM.

Q18) Do you agree with the proposal for connecting to a new heat network, as presented in the draft NCM modelling guide?

- a) Yes
- b) No, they give too much of an advantage to heat networks
- c) No, they do not give enough of an advantage to heat networks
- d) No, I disagree for another reason

A – Yes, no strong opinion, as long as the proposals are proven and rely on the NCM.

Q19) Do you agree with the proposed changes to the National Calculation Methodology Modelling Guide and activity database?

- a) Yes
- b) Yes, but additional changes should be made
- c) No

B – Elmhurst believe additional changes can be made to improve the validity and representation of energy in non-domestic buildings such as;

1. A review of shower activities in SBEM to account for a variety of activities that may have showers present, we currently have limited ability to account for showers in other activities. The consultation SBEM version only gives showers for high, medium and low to the D2 building type activity list. We believe this should be applied to all building types with shower activities.

2. The treatment of PV in SBEM calculations. We should be able to assess and review the amount of energy generation that is supplied to the grid. We should be able to penalise and incentivise systems that supply electricity to the grid based on how much they provide to the grid (when not used by the building). The current process should be reviewed for this.
3. We would like to see further activities to try to improve industrial process building assumptions and bridge the gap between workshop and industrial process.

Q20) We would welcome any further suggestions for revising the outputs from SBEM, which would enable easier checking by building control on building completion. Please provide related evidence.

Elmhurst would advise a standardised methodology, which ensures all building regulation Part L2 checks (BRUKL reports) are completed by accredited, qualified and competent non-domestic energy assessors. We suggest that this be taken further by implementing mandatory lodgements of As Built BRUKL reports alongside the EPC to a centralised government register. This would allow the industry to audit and standardise the process of achieving building regulation compliance.

Our suggestions above would also increase the transparency of the document for all parties involved. Building owners, tenants and designers would be able to quickly access the reports that could help decrease the performance gap.

The BRUKL document can be improved by utilising more data. For example, the HVAC controls. The ADL Volume 2 document proposes self-regulating devices to all zones. This should be detailed on the BRUKL to allow for ease of checking.

Q21) Do you agree with the proposals for limiting heat gains in non-domestic buildings?

- a) Yes
- b) No, they go too far
- c) No, they do not go far enough
- d) No, I disagree for another reason

A – We agree with the proposals and believe it is achievable. However we should also encourage the use of shading devices that can minimise heat gains. This gives designers more variation in trying to minimise heat gains, which is crucial for the diverse nature of non-domestic buildings.

Q22) Do you agree with the proposed minimum standards for fabric performance in new non-domestic buildings as presented in Table 3.2 of this consultation document?

- a) Yes
- b) No, the standards go too far
- c) No, the standards do not go far enough
- d) No, I disagree for another reason

A – Yes, this is achievable, no strong opinion.

Q23) Do you agree with the proposed minimum standards for fabric performance of new thermal elements in existing non-domestic buildings as presented in Table 3.3 of this consultation document?

- a) Yes
- b) No, the standards go too far
- c) No, the standards do not go far enough
- d) No, I disagree for another reason

A – Yes, we agree that the standards are achievable, although building owners will most likely be faced with higher costs of materials that are generally the benefit of the next occupier.

Q24) Do you agree with the draft guidance in paragraph 4.15 of the draft *Approved Document L, volume 2: buildings other than dwellings* on reducing unwanted air infiltration when carrying out work to existing non-domestic buildings?

Agree – no strong opinion.

Q25) Do you agree that the limiting U-value for rooflights in new and existing non-domestic buildings should be based on a rooflight in a horizontal position, as detailed in paragraph 4.4 of draft *Approved Document L, volume 2: buildings other than dwellings*?

Agree – no strong opinion.

Q26) Do you agree that we should adopt the latest version of BR 443 for calculating U-values in new and existing non-domestic buildings, as detailed in paragraph 4.1 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a) Yes**
- b) No**

A - Elmhurst agree that the latest version of BR 443 be adopted. Elmhurst also propose that this essential document is subject to regular review, involving all stakeholders overseen by effective governance. This will better ensure that the standards are kept up to date with the latest innovations moving forward.

Q27) Do you agree with the newly proposed minimum efficiencies for natural gas, oil and LPG boiler and domestic hot water system installations in new non-domestic buildings in Section 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a) Yes**
- b) No, the standards go too far**
- c) No, the standards do not go far enough**

A – Yes, no strong opinions.

Q28) Do you agree with the proposed set of standards for air distribution systems for new non-domestic buildings in Section 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a) Yes**
- b) No, the standards go too far**
- c) No, the standards do not go far enough**

A – Yes, no strong opinions.

Q29) Do you agree with the proposals for self-regulating devices for new non-domestic buildings, as set out in Sections 5 and 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a) Yes**
- b) No**

A - Yes, the devices would help control environments and reduce energy demand. However, this does not ensure that the device will be utilised effectively once the building is built, as it heavily relies on human behaviour. This should be addressed and accounted for in the hand-over stage.

Q30) Do you agree with the minimum efficacy proposals for lighting in new non-domestic buildings in Section 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a) Yes**
- b) No, the standards go too far**
- c) No, the standards do not go far enough**

A – Yes, no strong opinions.

Q31) Do you agree with the proposals for cooling in new non-domestic buildings in Section 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a) Yes**
- b) No, the standards go too far**
- c) No, the standards do not go far enough**

A – Yes, no strong opinion.

Q32) Do you agree with the proposals to require building automation and control systems in new non-domestic buildings, when such buildings have a heating or air-conditioning system over 290kW?

- a) Yes**
- b) No, a different trigger point should be used**
- c) No, I do not agree that building automation and control systems should be required in new buildings**
- d) No, I disagree for another reason Please also highlight any unintended consequences that may result from setting this standard.**

B – Elmhurst firmly believe that BAC systems should be a requirement in the Future Buildings Standard, as this increases the chances of better management and measurement practices. Measurement of the building is the first step to understanding the building and occupier use. This allows for more appropriate decisions for improvement to be made. However the requirement should be applied to all buildings based on their actual size rather than 290kW trigger point as the system measures more than just the air conditioning and we believe this removes the opportunity for some building to also have this system installed. Basing the requirements on the size of the air-conditioning system could also lead to unintended consequences, as systems may be undersized for building compliance as described in the consultation.

Q33) Do you agree with the technical specification for new building automation and control systems as EN 15232, Class A?

- a) Yes**
- b) No, the requirements go too far**
- c) No, the requirements do not go far enough**

No strong opinion.

Q34) Do you agree with the proposals for improving the commissioning guidance for new non-domestic buildings in Section 8 and 9 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a) Yes
- b) No, the standards go too far
- c) No, the standards do not go far enough
- d) No, I disagree for another reason

A – No strong opinion.

Q35) Do you agree with the proposals for requirements relating to the assessment of overall energy performance of building services installations and providing information to building owners for new non-domestic buildings given in sections 8 and 9 of *Approved Document L, volume 2: buildings other than dwellings*?

- a) Yes
- b) No

A – No strong opinion.

Q36) Do you agree with the guidance proposals for adequate sizing and controls of building services systems in new non-domestic buildings, as detailed in Sections 5 and 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a) Yes
- b) No, I do not agree with providing guidance on this
- c) No, the guidance should be improved

A – Yes, no strong opinion, however all documents and specifications that are mentioned should be made more publically available.

Q37) Do you agree with the proposal that wet space heating systems in new buildings should be designed to operate with a flow temperature of 55°C or lower?

- a) Yes, through a minimum standard set in paragraph 5.9 of the *Approved Document L, volume 2: buildings other than dwellings*
- b) Yes, through carbon and primary energy credit in SBEM
- c) Yes, by another means
- d) No, the temperature should be below 55°C
- e) No, this standard should not be applied to all new buildings
- f) No, I disagree for another reason

A – Yes, no strong opinion.

Q38) Do you agree with the proposals to clarify, rationalise and simplify the guidance for building services in new non-domestic buildings, and to incorporate the standards of the Non-Domestic Building Services guidance into the main body of the *Approved Document L, volume 2: buildings other than dwellings*?

Elmhurst agree that a simplified guide will increase standardisation, consistency, understanding and transparency.

Q39) Do you agree with the proposals to simplify the requirements in the Building Regulations for the consideration of high-efficiency alternative systems in new non-domestic buildings?

Yes - No strong opinion.

Q40) Do you agree with the efficiency proposals for replacement fixed building services in existing non-domestic buildings as detailed in paragraphs 5.4 to 5.7 of draft *Approved Document L, volume 2: buildings other than dwellings*?

Yes - No strong opinion.

Q41) Do you agree with the newly proposed minimum efficiencies for natural gas, oil and LPG boiler and domestic hot water system installations in existing non-domestic buildings in Section 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a) Yes**
- b) No, the standards go too far**
- c) No, the standards do not go far enough**

No strong opinion. We always agree to higher minimum efficiencies as long as the technology exists and is readily available and practical to install.

Q42) Should minimum boiler efficiency standards in existing non-domestic buildings still benefit from relaxations through the use of heating efficiency credits?

- a) Yes, boiler installations should continue to benefit from heating efficiency credits**
- b) No, boiler installations should no longer benefit from heating efficiency credits (the Government's proposal)**

No strong opinion. HVAC controls should be highlighted on the BRUKL report and the calculation should be reviewed to provide a more accurate assessment of HVAC controls.

Q43) Do you agree with the proposed set of standards for air distribution systems for existing non-domestic buildings in Section 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a) Yes**
- b) No, the standards go too far**
- c) No, the standards do not go far enough**

Yes - No strong opinion.

Q44) Do you agree with our proposed approach and guidance to mandating self-regulating controls in existing non-domestic buildings, including technical and functional feasibility, as detailed in Sections 5 and 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a) Yes
- b) No

Yes – but the approach needs to encompass how occupants use energy not just control regulation. Some improvements may be required in SBEM to allow it to incorporate controls in each zone rather than just applied to the HVAC system as current implemented.

Q45) Do you agree with the minimum efficacy proposals for lighting in existing non-domestic buildings in Section 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a) Yes
- b) No, the standards go too far
- c) No, the standards do not go far enough

C – We feel that the minimum efficacy should be the same for both general lighting and display lighting.

Q46) Do you agree with the proposals for cooling in existing non-domestic buildings in Section 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a) Yes
- b) No, the standards go too far
- c) No, the standards do not go far enough

Yes - No strong opinion.

Q47) Do you agree with the proposals that when Building Automation and Control System is installed in an existing non-domestic building with a heating or air-conditioning system over 290 kW, it should meet the same minimum standards as new non-domestic buildings?

- a) Yes**
- b) No, a different trigger point should be used**
- c) No, a different standard should be used**
- d) No, for another reason**

B – Elmhurst firmly believe that BAC systems should be a requirement in the Future Buildings Standard, as this increases the chances of better management and measurement practices. Measurement of the building is the first step to understanding the building and occupier use. This allows for more appropriate decisions for improvement to be made. However the requirement should be applied to all buildings based on their actual size rather than 290kW trigger point as the system measures more than just the air conditioning and we believe this removes the opportunity for some building to also have this system installed. Basing the requirements on the size of the air-conditioning system could also lead to unintended consequences, as systems may be undersized for building compliance as described in the consultation.

Q48) Do you agree with the proposals for requirements relating to the assessment of overall energy performance of building services installations and providing information to building owners for existing non-domestic buildings?

- a) Yes**
- b) No, I do not agree with providing this guidance**
- c) No, the guidance should be improved**

A – Yes, by providing this information to building owners, it is again ensuring that systems can be well maintained and operated in an effective manner.

Q49) Do you agree with the guidance proposals for adequate sizing and controls of building services systems in existing non-domestic buildings, as detailed in Sections 5 and 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a) Yes**
- b) No, do not agree with providing this guidance**
- c) No, the guidance should be improved**

A - Yes, no strong opinion.

Q50) Do you agree with the proposal that when whole wet space heating systems (i.e. boiler and radiators) are replaced in existing non-domestic buildings the replacement system should be designed to operate with a flow temperature of 55°C or lower?

- a) Yes, through a minimum standard set in paragraph 5.9 of *Approved Document L, volume 2: buildings other than dwellings***
- b) Yes, through carbon and primary energy credit in SBEM**
- c) Yes, by another means**
- d) No, the temperature should be below 55°C**
- e) No, this standard should not be applied to all existing buildings**
- f) No, I disagree for another reason.**

A –Yes, by enforcing the minimum standard it would ensure that buildings are fit for the future, where as if this was not the standard, it would make it harder for those buildings to the adopt low carbon heating systems.

However, this requirement could lead to unintended consequences. For example, oversized radiators needed for low temperature systems may be positioned poorly, directly affecting the heating demand and the increased body of water may impact on the responsiveness of the system.

Q51) Do you agree with the proposals to restructure the guidance for building services in existing non-domestic buildings, and to incorporate the standards of the Non-Domestic Building Services guidance into the main body of the *Approved Document L, volume 2: buildings other than dwellings*?

Yes, no strong opinion.

Q52) Do you agree the Government should continue to provide guidance for minimum building services efficiencies in existing non-domestic buildings, if the standard does not go significantly further than the Ecodesign regulations?

- a) Yes
- b) No, the Ecodesign regulations are sufficient
- c) No

No strong opinion. Any regulation implemented must be able to be assessed using the NCM.

Q53) Do you agree with the changes made to simplify, rationalise and clarify the guidance, and the updates to external references in Appendix E and Appendix F, in *Approved Document L, volume 2: buildings other than dwellings*, as outlined in paragraph 3.12.1 of the consultation document?

- a) Yes
- b) Yes, but not with the changes to the supplementary guidance
- c) Yes, but not with the external references
- d) No - Please do not repeat comments on the changes made to simplify, rationalise and clarify the guidance for Building Services which you have already provided under Questions 38, 51 and 52.

A – Yes, by simplifying and clarifying the guidance, it ensures that guidance is easier to understand and follow for all involved parties.

Q54) Do you agree that the measures in Tables D.1 and D.2 of Appendix D of *Approved Document L, volume 2: buildings other than dwellings* are likely to be technically, functionally and economically feasible under normal circumstances?

Yes, no strong opinion.

Q55) Do you agree with the proposals for relaxation factors for modular and portable buildings, as detailed in Tables 2.2 and 2.3 of draft Approved Document L, volume 2: buildings other than dwellings?

- a) Yes
- b) No, the requirements go too far
- c) No, the requirements do not go far enough

Yes – we feel it is important to encourage modular buildings to be insulated to new standards if possible. However, there should be a cut-off point, whereby old portable and modular buildings that are no longer able to meet certain regulations, should be retrofitted or replaced.

Q56) Do you think that the Pulse methodology should be an approved means of demonstrating airtightness for non-domestic buildings?

Yes, the Pulse methodology is an alternative, quick and easy method of demonstrating airtightness, which provides benefits for industry. Elmhurst always encourage the development of new technologies in the measurement and assessment industry.

Q57) Do you agree that we should adopt an independent approved airtightness testing methodology such as the CIBSE draft methodology for non-domestic buildings? a) Yes, and the CIBSE methodology is appropriate b) Yes, but with a methodology other than CIBSE c) No, an independent approved airtightness methodology shouldn't be adopted.

B - Yes, however we feel that an independent airtightness testing methodology must be developed with relevant industry stakeholder contribution.

Q58) Do you agree with the proposal for guidance on the calibration of devices that carry out airtightness testing in new and existing non-domestic buildings?

Yes – Calibration of equipment is carried out in other industries in line with manufacturer's guidance, air tightness testing devices should be no different. Calibration increases the accuracy and reliability of the equipment which is vital

when completing an air tightness test.

Q59) Do you agree with the proposed approach to energy sub-metering, as detailed in Section 5 of draft *Approved Document L, volume 2: buildings other than dwellings*?

Yes – the proposal that end-use categories, such as heating, lighting, and cooling are sub metered in such a way that at least 90 per cent of the annual energy consumption of each fuel can be assigned to an end-use. This allows for better monitoring of in-use performance moving forward. It improves the measurement of the building to allow for better decisions for improvements moving forward. It also assists schemes such as Display Energy Certificates (DECs), Energy Saving Opportunity Scheme (ESOS) and Streamlined Energy & Carbon Reporting (SECR) which heavily rely on in-use energy assessment.

Q60) Do you agree with the proposed approach to energy forecasting, as detailed in paragraph 9.4 of draft *Approved Document L, volume 2: buildings other than dwellings*?

a) Yes

b) No, I do not agree with the proposed approach

c) No, energy forecasting should not form part of the Building Regulations

Elmhurst agrees with the suggestion to try to improve the design gap however there are a number of issues in the proposed approach, such as the potential large costs to carry out such an assessment (£80,000 in some cases), the accuracy of the assessment and the demands this places on the developers, as well as the effectiveness of energy forecasting to improve built performance. Elmhurst recommends that if such a scheme is implemented, industry is consulted on the methodology, process and development to ensure the best possible solution is provided. Elmhurst suggest that to ensure quality, accuracy and consistency the scheme must follow the similar process to EPCs with the lodgement of the data to a central register and the quality assurance/surveillance regime as currently carried out within the EPC industry.

Q61) Do you agree with the proposals for transitional arrangements for buildings other than dwellings?

No strong opinion. Transitional arrangements should be realistic and achievable, with energy efficiency at the forefront.

Interim uplift to Part F standards for non-domestic buildings

Q62) Do you agree with the proposed guidance in Section 1 and Section 2 of Approved Document F, volume 2: buildings other than dwellings on minimising the ingress of external pollutants and on the proper installation of ventilation systems in non-domestic buildings?

Yes – however it is important to appreciate how this would impact energy usage and the efficiency of a building in reference to Part L.

Q63) Do you agree with the proposed guidance for reducing noise nuisance for ventilation systems in non-domestic buildings?

Yes – It is important to ensure that ventilation systems meet all relevant regulations and doesn't conflict with Part L. It is also important to ensure that all work is completed by the appropriate, competent individual, as well as any limits set should be measurable by competent individuals.

Q64) Do you agree with the additional guidance provided in paragraphs 1.18 to 1.26 of the draft Approved Document F, volume 2: buildings other than dwellings on the installation of ventilation systems?

Yes – it is important that ventilation systems are appropriately installed and that the system is checked over by a competent individual to ensure that it can be operated safely and efficiently.

Q65) Do you agree that the guidance in Appendix B of the draft *Approved Document F, volume 2: buildings other than dwellings* provides an appropriate basis for setting minimum ventilation standards?

Yes – However it is important to ensure that any standards set do not conflict with Part L and all work is carried out by competent individuals to appropriate standards.

Q66) Do you agree with the list of industry guidance presented in Section 1 of draft *Approved Document F, volume 2: buildings other than dwellings*?

Yes – the list of industry guidance seems comprehensive. It is important that all guidance is available in the public domain.

Q67) Do you agree with the list of references to industry guidance presented in Appendix C and Appendix D in the draft *Approved Document F, volume 2: buildings other than dwellings*?

Yes – the list of industry guidance seems comprehensive. It is important that all guidance is available in the public domain.

Q68) Do you agree with the proposals to simplify, rationalise and clarify the *Approved Document* guidance in *Approved Document F, volume 2: buildings other than dwellings* as outlined in paragraph 4.3.7 of the consultation document?

Yes – any move to improve understanding and interpretation of the guidance document. The clearer the guidance is, the easier it is to follow, which is a positive move for all parties.

Q69) Do you agree that purge ventilation in offices should be designed to provide at least four air changes per hour?

- a) Yes**
- b) No, this standard goes too far**
- c) No, this standard does not go far enough**

No strong opinion however it is important to appreciate how this would impact energy usage and the efficiency of a building in reference to Part L.

Q70) Do you agree with the guidance for the ventilation of car parks and offices, as detailed in Section 1 of *Approved Document F, volume 2: buildings other than dwellings*?

- a) Yes**
- b) Yes, but some improvements can be made**
- c) No, the guidance should be significantly changed - If you answered b or c, please explain your reasoning and provide alternative suggestions.**

Please note that the appropriate questions on measures to prevent the spread of infection are detailed in section 4.4 of this consultation document.

No strong opinion however it is important to appreciate how this would impact energy usage and the efficiency of a building in reference to Part L.

Q71) Do you agree with the proposals in Section 3 of draft *Approved Document F, volume 2: buildings other than dwellings*, when replacing an existing window with no background ventilators?

- a) Yes**
- b) No, the standards do not go far enough**
- c) No, the standards go too far**

B – Ventilation provision of the building should be improved when replacing windows, not aim to keep it as the same as before any work was carried out. It is important that any work carried out is done so in conjunction with Part L.

Q72) Do you agree with the proposal to provide a completed commissioning sheet to the building owner and associated guidance in Section 4 of draft Approved Document F, volume 2: buildings other than dwellings?

Yes – by providing guidance to the building owner it ensures that the system is operated correctly and efficiently, thus prolonging the life of the equipment, making it more appealing for consumers and building owners. The commissioning sheet should be completed and verified via an independent assessment carried out by a competent individual, and this document can then be transferred to any subsequent building owners/ occupiers in a form of building log book.

Q73) Do you agree with requiring increased capacity of 50% within new ventilation systems in offices shown in paragraph 1.38 of the draft Approved Document F, volume 2: buildings other than dwellings?

- a) Yes
- b) Yes, but with qualifications
- c) No, the standard is too high
- d) No, the standard is too low
- e) No, I disagree for another reason

No strong opinion, other than that the system should be inspected by an independent competent person to ensure standards are met at the point of completion and that it is important to appreciate how this would impact energy usage and the efficiency of a building in reference to Part L.

Q74) Do you agree with the proposed standards for provision of outdoor air for offices, shown in paragraphs 1.35 to 1.36 of draft Approved Document F, volume 2: buildings other than dwellings?

- a) Yes
- b) Yes, but with qualifications
- c) No

No strong opinion however it is important to appreciate how this would impact energy usage and the efficiency of a building in reference to Part L.

Q75) Do you agree that extract ventilation in bathrooms, WCs, and other sanitary accommodation should be capable of operating in a continuous mode if necessary?

Yes – however such a system may negatively impact the energy efficiency of a building. So compromise must take place between the importance of ventilating areas and the importance of a building's energy efficiency.

Q76) Do you agree with the proposal for indoor air quality monitoring in offices as outlined in paragraphs 1.39 to 1.41 of draft *Approved Document F, volume 2: buildings other than dwellings*?

- a) Yes
- b) Yes, but with qualifications
- c) No

B - Yes, any monitoring of air quality should be carried out by an appropriate, qualified individual.

Q77) If applicable, please provide any suggestions for guidance for indoor air quality monitoring (e.g. CO₂ monitoring) in non-domestic buildings.

Sensors and measuring devices to detect movement of people to ensure targeted monitoring is carried out. Regular calibration of all monitoring equipment in line with manufacturer's guidance.

Q78) Do you agree with the proposals for systems that recirculate air as outlined in paragraph 1.46 of draft *Approved Document F, volume 2: buildings other than dwellings*?

No strong opinion however it is important to appreciate how this would impact energy usage and the efficiency of a building in reference to Part L.

Q79) Do you agree with the proposed minimum ventilation standard in occupiable rooms in all types of non-domestic buildings where singing, loud speech or aerobic exercise may take place, where low temperature and low humidity environments may exist, or where members of the public may gather in large groups? These are outlined in paragraphs 1.27 and 1.28 of draft *Approved Document F, volume 2: buildings other than dwellings*.

- a) Yes
- b) Yes, with qualifications
- c) No

B - Yes, it is important that any monitoring/ targeting is carried out by correctly qualified, competent individuals and it is important to appreciate how this would impact energy usage and the efficiency of a building in reference to Part L.

Q80) Do you think the mitigating measures to protect against infection via aerosols would be suitable for any non-domestic buildings other than those stated in the *Approved Document* guidance?

No strong opinion however it is important to appreciate how this would impact energy usage and the efficiency of a building in reference to Part L.

Q81) How should the Government address the overheating risk?

- a) Through a new requirement in the Building Regulations and an *Approved Document*, as proposed in this consultation
- b) Through Parts L and F of the Building Regulations
- c) Through government guidance
- d) I have an alternative approach
- e) It isn't an issue that needs addressing.

Please explain your reasoning and provide alternative suggestions where applicable.

D - Elmhurst agrees that due to the magnitude of the overheating issue now and in future it is sensible that it should be covered in Building Regulations. Making this a

legal requirement will ensure much greater emphasis is placed on this vital area of the industry.

However we do not agree that a new Approved Document is required. We would prefer to see the new guidance and procedures contained within Approved Document L to minimise confusion for the industry and retain the strong relationship overheating has with energy efficiency.

Q82): Do you agree with the buildings that are in scope of this new part of the Building Regulations?

a) Yes

b) Yes, but they should be expanded to include more building types and/or existing buildings

c) No, they should be reduced to only include flats and houses

d) No, I disagree for another reason

Please explain your reasoning.

D - Elmhurst agrees with the building types covered in relation to new homes.

However we are concerned that no regulations or guidance for homes being retrofit is a missed opportunity. The need to retrofit existing homes with insulation and improve air tightness for energy efficiency is fundamental to achieving our net zero goals, but this should also consider the potential risk of overheating due to these measures.

We believe further guidance should be provided in both the simplified method and detailed method for mitigating overheating risk in existing homes.

Q83): Do you agree that the division of England based on overheating risk detailed in paragraph 5.6.3 of this consultation document is correct?

a) Yes

b) No, there should be one area

c) No, there should be more

C - Elmhurst believes there will be other areas of the country that will suffer the same issues as Greater London, especially in future. We believe an alternative division of

requirements could be based on population density per km² and any area with a density similar to or greater than London should be included in the more stringent requirements.

Q84): Do you agree with the categorisation of buildings into Group A and Group B as detailed in paragraph 5.6.5 of this consultation document?

- a) Yes
- b) No

Yes, categorising buildings based on number of fabric elements and provision of cross ventilation seems sensible and in line with published research.

Q85): Do you agree with the simplified method as a means of compliance with the proposed new requirement to reduce overheating risk?

- a) Yes
- b) No, the method should be more sophisticated
- c) No, the method is too easy to pass
- d) No, for another reason

D - We advocate still using SAP as the indicator of risk, and invest in the methodology to improve it. SAP 10 already has made changes in this area in an attempt to provide a better indication of the risk of overheating. We believe SAP could be used to show 'Green' and 'Red' categories. Green would have little or no risk of overheating, however if red is shown this would require dynamic simulation analysis to be used.

Q86) Do you agree with the maximum glazing area and shading standards for limiting solar gains in the simplified method as detailed in paragraphs 1.6 to 1.9 of the draft Overheating Approved Document?

- a) Yes
- b) No

Yes, we support a glazing area limit however we are mindful this could result in unintended consequences such as high energy use due to excessively low solar gain. Also we would request consideration is given to glazing areas being specified per façade to encourage appropriate levels of south and north facing glazing.

Q87) Do you agree with the approach to removing excess heat in the simplified method as detailed in paragraphs 1.10 to 1.13 of the draft Overheating Approved Document?

a) Yes

b) No

Yes, we support this approach but again would be mindful of any unintended consequences such as effectively restricting the use of certain opening types.

Q 88) Do you think that adequate levels of daylight will be provided and that homes will be acceptable to purchasers while meeting these proposed standards?

a) Yes

b) No

No strong opinion

Q89) Do you agree with offering dynamic thermal analysis as a means of compliance with the proposed new requirement to reduce overheating risk?

a) Yes, as described in the draft Overheating Approved Document

b) Yes, but not as described in the draft Overheating Approved Document

c) No

Yes, Elmhurst believes due to the seriousness of this issue now and in the future this should be only completed by members of a new, Government approved competent persons scheme, members of which would be appropriately trained, subject to audit and hold insurance.

See research undertaken by University of Bath which questions the competency of existing building modellers [here](#).

Q90) Please detail any information you have about the likelihood of occupants opening doors and windows at night in unoccupied rooms.

No strong opinion

Q91) Do you agree with the proposed acceptable strategies for shading and the removal of excess heat, when following the dynamic thermal analysis method, as found in Section 2 of the draft Overheating Approved Document?

- a) Yes, I agree with both sets of acceptable strategies**
- b) Yes, but with amendments to the acceptable shading strategies**
- c) Yes, but with amendments to the acceptable strategies to remove excess heat**
- d) Yes, but with amendments to both sets of acceptable strategies**
- e) No, I do not agree with the acceptable strategies**

No strong opinion

Q92) Do you agree that the overheating standard should not account for the effect of curtains, blinds and tree cover?

- a) Yes, curtains, blinds and tree cover should be excluded**
- b) Yes, but only curtains and blinds should be excluded**
- c) Yes, but only tree cover should be excluded**
- d) No, none of these should be excluded**

A – Yes, this is currently a loophole in SAP where internal curtains and blinds can be assumed to be shut at all times which in reality is unlikely to happen.

Q93) Do you agree that the building should be constructed to meet the overheating requirement without the need for mechanical cooling?

- a) Yes
- b) No

Yes, no strong opinion

Q94) Do you agree with limiting noise in new residential buildings when the overheating strategy is in use, and the proposed guidance in Section 3 of the draft Overheating Approved Document?

- a) Yes
- b) Yes, but with amendments to the guidance
- c) No, I do not agree with limiting noise when the overheating strategy is in use

No strong opinion

Q95) Do you agree with minimising the ingress of external pollutants when the overheating strategy is in use, and that the external pollutants guidance in Approved Document F, volume 1: dwellings should be followed where practicable?

- a) Yes
- b) Yes, but with amendments to the guidance
- c) No, I do not agree with minimising the ingress of external pollutants when the overheating strategy is in use

Yes, Elmhurst agree with the guidance on reducing the ingress of external pollutants but not at the expense of providing an adequate ventilation system.

Q96) Do you agree with the proposals on security in Section 3 of the draft Overheating Approved Document in new residential buildings?

- a) Yes
- b) No

No strong opinion

Q97) Do you agree with the protection from falling guidance proposed in Section 3 of the draft Overheating Approved Document?

- a) Yes**
- b) No**

No strong opinion

Q98) Do you agree with the guidance on protection from entrapment proposed in Section 3 of the draft Overheating Approved Document?

- a) Yes**
- b) No**

No strong opinion

Q99) Are there any further issues which affect usability that should be included in the Overheating Approved Document?

- a) Yes**
- b) No**

No strong opinion

Q100) Do you agree with the proposed requirement to provide information on the overheating strategy to the building owner?

- a) Yes, I agree with the requirement, the list provided and that this should be within a Home User Guide**
- b) Yes, I agree with the requirement, but think that the list provided should be changed or that this should not be provided within a Home User Guide**
- c) No, I do not agree with providing information**

A - The Home User Guide is an established package under the current Approved Document L so we agree this should also be expanded to cover overheating strategies.

Q101) How do you see this new Building Regulation interacting with policies in local plans?

Currently some authorities request modelling in accordance with CIBSE TM59 methodology in a similar manner to what is being proposed. However some local authorities may use different methodologies specific to their requirements, which could result in different outcomes between the Building Regulations and local policies.

Q102) Do you agree that this guidance on limiting the effects of heat gains in summer, in both Approved Document L guidance for new dwellings and SAP Appendix P, can be removed?

a) Yes

b) No

Elmhurst recommends the use of SAP as the indicator of risk, and invest in the methodology to improve it. SAP 10 already has made changes in this area in an attempt to provide a better indication of the risk of overheating. We believe SAP could be used to show 'Green' and 'Red' categories. Green would have little or no risk of overheating, however if red is shown this would require dynamic simulation analysis to be used.

Q103) Should the transitional arrangements that apply to the overheating requirements align with the proposed transitional arrangements for Part L and F 2021 for new dwellings, as described in paragraph 5.10.2 of this consultation document?

a) Yes

b) No

As Part L 2021 will likely result in improvements in fabric and air tightness standards in new homes it would be sensible to include the overheating requirements in the same set of transitional arrangements.

Q104) Do you agree with the proposed minimum fabric standards for existing domestic buildings set out in Table 6.1 of this consultation document?

a) Yes

b) No

Elmhurst believes the standards proposed for new thermal elements are appropriate and in line with new homes.

However we would like Government to take action in the area of conservatories. In most cases conservatories are habitable rooms and are a very inefficient form of building. Therefore we suggest that a separate set of requirements could be created for thermally separate conservatories that still require good levels of energy efficiency rather than allowing them to be exempt from the energy efficiency requirements entirely as they are currently.

Q105) Do you agree with the draft guidance in section 4 of the draft Approved Document L, volume 1: dwellings on reducing unwanted air infiltration when carrying out work to existing homes?

No, we believe there should be a requirement for pre and post air testing on these properties to show the level of air infiltration and find areas where improvements to infiltration can be made.

Q106) Do you agree that we should control the primary energy and fabric energy efficiency of new extensions to existing homes when using the SAP method of compliance?

No, we are of the opinion that the whole dwelling method is already complicated and too many metrics within the process may add to the confusion. We think that using fabric energy efficiency instead of primary energy, and retaining carbon emissions as metrics would ensure good energy efficient extensions, with appropriate carbon emissions.

Q107) Do you agree that the limiting U-value for rooflights in existing domestic buildings should be based on a rooflight in a horizontal position, as detailed in Section 4 of draft Approved Document L, volume 1: dwellings?

a) Yes

b) No

Yes, no strong opinion

Q108) Do you agree that we should adopt the latest version of BR 443 for calculating U-values in existing domestic buildings, as detailed in Section 4 of draft Approved Document L, volume 1: dwellings?

a) Yes

b) No

Yes, no strong opinion

Q109) Do you agree with the proposed minimum fabric standards set out in Table 6.2 of this consultation document, and Sections 4 and 11 of draft Approved Document L, volume 1: dwellings?

a) Yes

b) No

No, demand for conversions is increasing with pressure to use many existing buildings including brownfield sites and potentially office blocks due to COVID. We believe that the proposed standards are not ambitious enough as they have not been updated for ten years.

As they currently stand the conversions are misleading with consumers unprotected. Purchasers may think they are buying a newly built home, but it usually has poor fabric efficiency leading to high space heating demand. Additionally, with the move to electric heating poor building fabric could lead to very high fuel bills and place home owners in fuel poverty.

We believe the industry has innovative solutions to enable all types of existing building to make improvements over the standards proposed.

Q110) What level of FEES should be used for Part L 2021?

- a) Option 1, full fabric specification**
- b) Option 2, fabric specification x1.15**
- c) Neither, it should be higher**
- d) Neither, it should be lower**

A - We do not see any reason why FEES should be given an allowance over the Part L 2021 notional building. The FEES target should be kept consistent with the confirmed Primary Energy and Carbon Emission targets to reduce confusion for industry.

Q111) Do you agree that we have adequately covered matters which are currently in the Domestic Building Services Compliance Guide in draft Approved Document L, volume 1: dwellings for existing homes?

- a) Yes**
- b) No**

Yes, no strong opinion

Q112) Do you agree with the proposed minimum standards for building services in existing homes, as detailed in Sections 5 and 6 of draft Approved Document L, volume 1: dwellings?

- a) Yes**
- b) No, the standards go too far**
- c) No, the standards do not go far enough**

Yes, no strong opinion

Q113) Do you agree with the proposals for replacement fixed building services in existing homes, as detailed in Section 5 of draft Approved Document L, volume 1: dwellings?

Elmhurst agrees but we also think that it is important that the sizing of the heating system is being considered and that the guidance is correctly followed.

Q114) Do you agree with our proposed approach to mandating self-regulating controls in existing domestic buildings, including technical and economic feasibility, as detailed in Sections 5 and 6 of draft Approved Document L, volume 1: dwellings?

Yes, Elmhurst agrees that self-regulating devices should be fitted in all appropriate rooms/zones e.g. not where a room stat is fitted.

Q115) Do you agree with the proposed specifications for building automation and control systems installed in a new or existing home, as detailed in Section 6 of draft Approved Document L, volume 1: dwellings?

- a) Yes
- b) No

Yes, Elmhurst agree with the proposal to provide advice about building automation. However it is important that such automation especially that originally designed for commercial buildings is recognised in the SAP methodology. Where the building occupier needs knowledge or information to use the technology then it should be supplied in a central repository (similar to the Data warehouse, or in a property log book) that is accessible by other stakeholders and future owners of the property

Q116) Do you agree with the proposals for extending commissioning requirements to Building Automation and Control Systems and on-site electricity generation systems, as detailed in Sections 8 and 9 of draft Approved Document L, volume 1: dwellings?

- a) Yes
- b) No

Yes, no strong opinion

Q117) Do you agree with the proposals for requirements relating to the assessment of overall energy performance of building services installations and providing information to homeowners, as detailed in Sections 8 and 9 of draft Approved Document L, volume 1: dwellings?

Yes Elmhurst agree that the home owner should have a full set of the user guides related to the property. To ensure that these guides are accessible to future occupiers they should be retained in an online 'property log book', together with the EPC and the BREL, for future occupiers to access.

Q118) Do you agree with the proposed changes to water treatment guidance and removing formal guidance on water softening?

No strong opinion

Q119) Do you agree with the guidance proposals for adequate sizing and controls of building services systems in domestic buildings, as detailed in Sections 5 and 6 of draft Approved Document L, volume 1: dwellings?

Elmhurst agree but think that guidance must be clear and enforced, and who enforces it should be considered.

Q120) Do you agree with the guidance proposals on sizing a system to run at 55°C when a whole heating system is replaced, as detailed in Section 5 of draft Approved Document L, volume 1: dwellings?

Yes, Elmhurst believe house design should be future proofed wherever possible, however unintended consequences should be considered. For example, oversized radiators needed for low temperature systems may be positioned poorly, and the increased body of water may impact on the responsiveness of the system.

Q121) Do you agree with the proposed changes to the supplementary guidance and the external references in Appendix D and Appendix E, in the draft Approved Document L, volume 1: dwellings as outlined in paragraph 6.8.2.?

Yes, Elmhurst agree that this is a step towards keeping things more simple.

Q122) Do you agree with the proposal for guidance on the calibration of devices that carry out airtightness testing in new and existing domestic buildings?

Yes, Elmhurst believes that the manufacturer's guidance should be followed.

Q123) Do you agree that we have adequately covered matters for existing dwellings which are currently in the Domestic Ventilation Compliance Guide in draft Approved Document F, volume 1: dwellings?

a) Yes

b) No

Yes, no strong opinion

Q124) Do you agree with the proposed changes to supplementary guidance and the external references used in Appendix E and Appendix F, for existing domestic buildings from the draft Approved Document F, volume 1: dwellings?

a) Yes

b) Yes, but not with the changes to the supplementary guidance

c) Yes, but not with the external references

d) No

Yes, no strong opinion

Q125) Do you agree with the proposal to align the guidance and standards for work to existing homes to that outlined in Chapter 4 of the Government Response to the Future Homes Standard consultation?

a) Yes

b) No

Yes, no strong opinion

Q126) Do you agree with the proposed guidance for installing energy efficiency measures in existing homes, as detailed in Section 3 of draft Approved Document F, volume 1: dwellings.

a) Yes

b) No

Yes, no strong opinion

Q127) Do you agree with the content of the proposed checklist for ventilation provision detailed in Appendix D of draft Approved Document F, volume 1: dwellings?

a) Yes

b) No

Yes, no strong opinion

Q128) Do you agree with the guidance in Section 3 of draft Approved Document F, volume 1: dwellings when replacing an existing window with no background ventilators?

a) Yes

b) No, the standards go too far

c) No, the standards do not go far enough

Yes, no strong opinion

Q129) Do you agree with the proposals in paragraphs 3.29 to 3.31 of draft Approved Document F, volume 1: dwellings in 7.4.11 of this consultation document on work to existing kitchens or bathrooms?

- a) Yes
- b) No, the standards go too far
- c) No, the standards do not go far enough

Yes, no strong opinion.

Q130) Do you agree with the proposal to provide a completed commissioning sheet to the homeowner, as detailed in Section 4 of draft Approved Document F volume 1: dwellings?

Yes we agree. The Government should insist on the independent testing of a home's ventilation system's to ensure adequate design and functioning and this should be presented to the building owner, and the occupants. Testing should be completed by an accredited, competent person.

Q131) Please provide any feedback you have on the impact assessment here, including the assumptions made and the assessment of the potential costs and benefits of the proposed options we have made.

No strong opinion

Q132) Please provide any feedback you have on the potential impact of the proposals outlined in this consultation document on persons who have a protected characteristic. Please provide evidence to support your comments.

No strong opinion



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