

# Summary of BEAMA response to Building Regulations consultation on Part L, Part F and Future Homes Standard



## Future Homes Standard

- Q1. We support a minimum standard emissions reductions of 75-80% compared to 2013, but with clear options of how to achieve greater reductions, with recognition for homes built to higher standards giving prospective homeowners visibility and choice. We also need improvements in indoor air quality and a pathway to encourage flexible energy.
- Q2. Heat pumps are technically and commercially feasible as a prime solution for new homes from both 2020 and 2025. Direct electric has a continued role to play as a low carbon technology, particularly in smaller properties. The Regs need to maintain a flexible approach and allow other product solutions. Advances on infrastructure in the form of 3-phase supply and improvements to distribution boards would be key enablers to better energy management from 2025.
- Q3. We agree that the fabric levels of Option 1 should be used in the 2025 Regs. 2020 must bring an improvement in compliance and enforcement on ventilation – in 2025 continuous ventilation will be necessary so good practice needs to be built up from now.
- Q4. Local authorities should be allowed to set their own minimum standards until at least 2025. Banning this now would mean a counterproductive reduction in standards in some locations.
- Q5. We agree work is needed urgently towards 2025 and BEAMA is ready to fully participate.

## Part L 2020

- Q6. We agree with Option 2, 31% CO<sub>2</sub> reduction. It is inconceivable that any Government could credibly say it is working towards net zero if the stated level of ambition in the consultation does not become reality. Option 2 is feasible and necessary for preparing for 2025.
- Q7-8. We agree with introducing primary energy as a metric. Retaining a CO<sub>2</sub> target is essential.
- Q9-10. More details are needed on the affordability metric to judge its suitability. Using MEER gives a partial picture, as install and maintenance costs and product lifespan affect affordability.
- Q17. Heat pump efficiency should be expressed as a percentage as in Ecodesign.
- Q18-19. 45°C as mandatory max flow temperature is more efficient. With proper pipe sizing and spacing, heat pumps and boilers can run at 45°C. Use of underfloor heating would be ideal as it would be the most cost-effective emitter. The term 'emitter' must be used rather than radiator.
- Q27. Other references are needed, including BS 7593 and BS HD 60364-8-1.
- Q28. Scrapping the Compliance Guide would lead to poorer quality installations and poorer outcomes for householders as there is no current accepted guidance to replace the content of the CG. Industry can produce guidance but there may be several versions and none with the status of a Government document. The CG should only be removed following a full separate consultation on change to the ADs and discussion of alternatives.
- Q29. Many key areas of content are missing from the draft AD. These include water treatment for central heating systems, which by following only the AD would perform with lower efficiency and at greater risk of breakdown. Other omissions are in the areas of lighting, heating controls, underfloor heating and system commissioning and balancing. There should be further engagement with industry to ensure these essential matters are covered accurately.
- Q30. The Compliance Guide for Part F should also be retained. In ADF, minimum standards for installation of ductwork should be included, and amendments are needed on kitchen ventilation.
- Q32-33. SRDs should continue to be required as minimum. They will always be technically and economically feasible, with payback of less than 2 years when installed with a boiler.
- Q34. Guidance on BACS should be included but design requirements should be explored more.

## Part F 2020

Q35. We agree with the guidance in Appendix B.

Q36. Using individual VOCs to determine ventilation rates could result in inadequate ventilation. There is a risk of neglecting other VOCs that may be present or introduced subsequently.

Q38. The guidance does not sufficiently address the problem of noise. Levels referred to in ADF should be retained. Systems need to be designed and commissioned correctly to avoid issues with noise.

Q39. The changes of terminology from the four system types previously defined in the AD could negatively impact on compliance. PSV could be removed from the main guidance but should be included on a list of other systems that could be applicable along with e.g. PIV.

Q40. Part F should specify clearly which systems can be used at varying levels of airtightness.

Q41. MEV should not be excluded from less airtight homes; this would be a large unjustified change.

Q42. Proposed ventilator areas are too large. It will not always be feasible for the supply chain to deliver the proposed sizes and therefore some flexibility is needed.

Q43. We agree with the aim of simplifying ventilation rates. However, more dialogue is requested on some aspects that are currently unclear.

Q44. Background ventilators providing a minimum equivalent area of 4000mm<sup>2</sup> should be installed.

Q45. References to EN13142 and EN13141 are for versions that will soon be obsolete.

Q46. On the commissioning sheet existing descriptions of systems 1,3,4 should be retained. Other items should be added including condensate trap, sealing of ducting and installation of filters.

Q47. The wording in Part P for 'certification, inspection and testing' should be adopted for clarity and consistency

## Compliance, Performance and Providing Information

Q59. We agree with introducing a BREL, but the route to better compliance with Building Regs would be thorough enforcement. Consistency is needed e.g. on compliance of certification for Parts F and P which are treated differently in practice. BREL should include commissioning information.

Q60-63. We agree there should be as much transparency as possible, including photographs and EPC version, and that this will help Building Control and householders.

Q64. We agree Home User Guides would be useful. We can contribute to developing two-pagers on key services. These should cover the rationale for how new homes are changing, how to use a technology, to maintenance needs, and contacts for further information from the manufacturer.

### Transitional arrangements

Q65-67. We agree that more houses should be built to the latest Regulations, but the plans need to be watertight and enforcement must happen in practice.

### Impact Assessment

Q68-69. There is relatively little detail in the IA, but underfloor heating is underappraised as lifetime cost savings and health benefits are not recognised

### Additional comments

Hot water storage should be mandated in future.

Work is needed to move to three-phase supply along with other electrical infrastructure upgrades.

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