

Appendix 1

The response of Warwick District Council to the Government consultation on The Future Homes Standard: changes to Part L and Part F of the Building Regulations for new dwellings

The Government is seeking views on two options, either of which would uplift the current energy efficiency standards in Part L of the regulations and the proposed transitional arrangements. Also under consideration are changes to Part F which deals with ventilation and specifically to airtightness and improving as-built performance.

This Council welcomes the opportunity to respond to the Government's proposals with regard to exceeding current standards.

In response to questions 3 and 6:

Option 1: "20% reduction in carbon emissions compared to the current standard for an average home. We anticipate this could be delivered by very high fabric standards (typically with triple glazing and minimal heat loss from walls, ceilings and roofs)."

The Council considers this to be a very diluted approach to improving energy efficiency which will not meet the required outcome to bring all its greenhouse gas emissions to net zero by 2050, even if this were to be the first step with further changes to follow. This Council has declared a climate emergency (June 2019) and this option would not assist in meeting the target locally of becoming a net-zero carbon organisation, including contracted out services, by 2025, or facilitating decarbonisation by local businesses, other organisations and residents so that total carbon emissions within Warwick District are as close to zero as possible by 2030.

Portfolio Holder for Environment & Business Councillor Alan Rhead commenting on the declaration said "By passing this motion, the new Council has declared how serious and committed we all are to tackling the issues around climate change and the environment. However, it is important to note that under the previous Administration several environmental actions had already been implemented and as a result there are many other schemes in progress which will be set out as each becomes finalised. I am looking forward to working with colleagues and partners over the coming months to formulate plans which will have a real impact on reducing carbon emissions and improving air quality in our district." The Council does not believe that Option 1 will result in it being able to meet this obligation.

Relying on a further increase in standards in 2025 will not achieve the targets set and implementation of higher standards is needed immediately to address lack of delivery within the housebuilding industry. Going through another

consultation on a further uplift is both time consuming and costly and delays further the implementation of effective standards.

In response to question 6:

Option 2: "31% reduction in carbon emissions compared to the current standard. We anticipate this could be delivered based on the installation of carbon-saving technology such as photovoltaic (solar) panels and better fabric standards, though not as high as in option 1 (typically double not triple glazing)." This is the government's preferred option.

Again, the view of the Council is that, even at this more elevated level of exceedance against current standards, this option does not go far enough to meet targets either nationally or locally. The proposals in either option, do not go far enough in this Council's view and would encourage the Government to revisit the options and increase the % reduction with a realistic view to meeting reduced carbon emission targets accordingly.

In response to question 65:

It is unclear, particularly to developers, how these measures would be implemented in relation to the life of a site. It is stated that if a site is under construction, this will mean that any dwellings not commenced will need to be developed under the new regulations. Developers will no doubt feel aggrieved if this is the case and it could well result in many 'starts' on individual plots in order to avoid having to comply with the stricter standards, which do not then progress.

In response to question 4:

The Council is particularly concerned that in view of the above and Government's proposal to remove the ability of local planning authorities to set higher energy efficiency standards than those in the Building Regulations, this Council will be unable to meet its own adopted targets in relation to energy efficiency. This is very limiting at a time when local authorities are attempting to set and achieve higher standards than are currently adopted or even those now proposed in Options 1 and 2. As an authority wishing to break new ground and provide exemplar developments of which it can be proud, it is exasperating to find that any exceedance of new standards will not be supported and prevents a more ambitious approach. Local planning authorities are under increasing criticism that they are not doing enough to deliver carbon emission reductions and these proposals do nothing to change that view.

In response to question 69:

It is of major concern that developers will claim that meeting the increased standards will not be viable on a whole range of schemes. In spite of adopted Local Plan policies that encourage developers to embrace a whole gamut of energy saving and reduced carbon emission technologies, the volume house builders often revert to the excuse that these are too expensive to include, increasing house prices beyond what purchasers are willing to pay and making the development unviable. Ironically perhaps then, it is the smaller, local

builders who have been willing to try such schemes where margins are smaller and risks higher. With larger developments come economies of scale, it should therefore not be an issue for the volume house builders to make this work without issues of viability. The quoted costs in both options 1 and 2 of this consultation do not add greatly to the individual cost of dwellings and where new three bedroom semi-detached houses in this district attract an average asking price of over £320,000, another £5,000 is going to make little difference to the consumer or their appetite to buy. If all houses are built to the same standard, there would be no reason why they could not be viable.

Additionally:

The Council considers that the standards must apply to all new development including extensions to existing dwellings. Permitted development rights already permit small extensions to be omitted from carbon reduction technology through planning policies; those at a larger scale and needing planning permission, should not be excluded from meeting the higher standards applied to new dwellings. Development of existing housing stock should not be exempt from the standards imposed on new builds since older properties are far less energy efficient and make up the vast majority of residential buildings nationally.

There is also considerable concern about the lack of control brought about by the relaxation of planning control over permitted development rights. Many sub-standard residential developments are being developed as a result of the conversion of commercial buildings into dwellings. Building control is not effective where consultants, rather than local authority building control departments, are involved in signing off completions on dwellings which often don't meet the standard. This Council would like to see Government addressing this issue.

Please accept this consultation response made on behalf of Warwick District Council.

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