



It is widely agreed by construction industry groups that by 2030 all new buildings will need to operate at Net Zero (i.e. annual net zero carbon emissions) if we are to meet our climate change targets. This means that by 2025 100% of all new buildings must be designed to Net Zero. To achieve this the UK construction industry needs a clear plan for how to measure compliance at design stage, and ensure performance of buildings after occupation. Approved Document Part L needs to become the legislative driver for this step change.

In May 2019 the UK Parliament declared a climate change emergency, and in June it passed a law to bring all greenhouse gas emissions to net zero by 2050. This is a positive first step, but now we need strong national and local policies to drive and enforce change.

Part L updates for both domestic and non-domestic buildings are long overdue. Now the government is consulting on changes to Part L (energy efficiency) and Part F (ventilation) of the Building Regulations for new dwellings. This is the first step towards the 2025 Future Homes Standard. This aims for “new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency”.

At QODA, we think the proposed changes to Part L are not enough – the standards need to be higher given the urgent need to reduce carbon emissions, and the failure of current regulations to achieve savings in reality.

It is worrying that the government’s preferred option for Part L uplift is for weaker fabric standards which are offset by low carbon technologies. Key issues with the proposed consultation are:

**1. Fabric performance is likely to get worse – a home in 2020 could be less insulated than a home under 2013 Building Regulations.**

**2. Carbon and primary energy factors disguise the energy efficiency of a home: the energy consumption and related fuel costs of a home can be high but carbon emissions low.**

**3. Local authorities will be stripped of their powers to go above and beyond the new Part L and will lose the ability to meet their climate emergency zero carbon commitments.**

We want to see the following changes to Part L:

- The Fabric Energy Efficiency Standard (FEES) must not be removed. Fabric efficiency should always come first!
- Include performance metrics such as Energy Use Intensity (EUI) in kWh/m<sup>2</sup>/yr.
- The 31% carbon reduction target is not a sufficient step forward. We want to see homes expected to make at least a 50% reduction in carbon emissions, ideally 60%.
- Local authorities should not be stripped of their ability to set stretching and locally applicable targets. We should support their ambition.
- A shift to energy consumption monitoring needs to be set out in the 2020 review.
- To ready the industry, (metered) kWh/m<sup>2</sup>/yr targets need to be introduced in the 2020 review, with operational compliance as an optional route to compliance.
- Set a trajectory for introducing requirements for Whole Life Carbon assessment and embodied carbon reductions.

QODA’s views are in agreement with the London Energy Transformation Initiative (LETI) who have produced a wealth of research and are leading the fight against lowering standards.

LETI have prepared answers to the consultation questions which we encourage everyone to use. We need a strong response to put pressure on the government to take our concerns seriously.