

FUTURE HOMES AND BUILDING STANDARDS 2023 CONSULTATION CITY OF DURHAM TRUST RESPONSE

Response ID ANON-CXDN-XV3G-N
Submitted to Future Homes and Building Standards 2023 consultation
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Introduction

What is your name?

Name:

[for City of Durham Trust]

What is your email address?

Email:

trust@durhamcity.org

1 Scope of Consultation

Question 1 Are you responding as / on behalf of (select all that apply):

Other

Question 2 If you are responding as a member of the public/ a building professional, what region are you responding from?

Not Answered

Question 3 If you are responding as a member of the public, are you a:

Not Answered

Question 4 If you are responding on behalf of a business/organisation, what is the name of your business/organisation?

Please provide the name of your business/organisation here.:

City of Durham Trust

Question 5 If you are responding on behalf of a business/organisation, where is your business/organisation based/registered?

a. North East England

Question 6 When you respond it would be useful if you can confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include:

your name, your position (if applicable), the name of organisation (if applicable), an address (including post-code), an email address, and a contact telephone number. (Your personal data is being collected so that we can contact you regarding your response and for statistical purposes, an essential part of the consultation process. We may also use it to contact you about related matters. Please see the Privacy Notice in Annex A of the consultation paper for further information on how we use this data.)

Please provide details here.:

Response submitted by [], Trustee.

Organisation: City of Durham Trust.

The City of Durham Trust is a civic amenity society which takes a strong interest in the planning system and environmental matters in Durham City and its surroundings. Many of the Trustees were involved in producing the City of Durham Neighbourhood Plan, and the Trust regularly responds to national and local policy consultations.

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Contact phone number: none

2 Acronyms

3 Introduction

4 Performance requirements for new buildings

Question 7 Which option for the dwelling notional buildings (for dwellings not connected to heat networks) set out in The Future Homes Standard 2025: dwelling notional buildings for consultation do you prefer?

a. Option 1 (higher carbon and bill savings, higher capital cost)

Question 8 What are your priorities for the new specification? (select all that apply)

lower bills, carbon savings, other (please provide further information)

Please provide any additional comments to support your view on the notional building for dwellings not connected to heat networks.:

Table 4.2 suggests that the additional capital costs of building to the higher standards of Option 1 would yield savings in less than eight years. The additional capital costs are also likely to reduce quickly once mandated in the Building Regulations. It therefore would be of great advantage to householders for all houses to be built to the higher standards. If the Building Regulations did not require the higher standards of Option 1, it would be harder for the householder (who might be moving on before the payback period ends) to justify and finance the extra costs of features such as waste water heat recovery and solar panels themselves. If, however, these higher standards are compulsory then the mortgage markets should react to offer packages that enable householders to afford the relatively small additional capital cost. The reduction in the ongoing running costs of the dwelling and, perhaps even more significantly, the reduced exposure to risks from volatility in the energy markets, should be recognised by the financial markets. The Trust is very much against Option 2, which will increase heating and hot water costs by comparison with the current Building Regulations, owing to the higher cost of electricity compared with gas. The Trust would like to see rapid adoption of Option 1 alongside consultation on a phased but rapid transition to higher fabric standards such as those described as Contender specification 3, 4 and 5 in the Future Homes Hub report. The Trust is also desirous that the improved specification does not result in a lowering of design standards and of the aesthetic considerations of proposals. The Future Homes task group report noted that moves towards more energy-efficient built forms such as terraced housing will need to be supported by stronger design codes to guide provision of car parking and bin storage. The challenges around positioning of heat pumps and the tendency for developers to reduce window sizes are also matters of concern. The Trust considers that the need for higher environmental, aesthetic and architectural design, the viability and encouragement of sustainable transport, social housing, genuine mixed-use development and increasing density of development for effective use of land will not be achievable through mere incremental changes to the typical volume housebuilder solutions which dominate the new-build housing market.

Question 9 Which option for the dwelling notional buildings for dwellings connected to heat networks set out in The Future Homes Standard 2025: dwelling notional buildings for consultation do you prefer?

a. Option 1 (higher carbon and bill savings, higher capital cost)

Please provide any additional comments on the specification of the heat network in the notional building.:

Question 10 Which option do you prefer for the proposed non-domestic notional buildings set out in the NCM modelling guide?

a. Option 1

Question 11 What are your priorities for the new specification?

lower bills, carbon savings

Please provide additional information to support your view on the proposed non-domestic notional buildings set out in the National Calculation Methodology modelling guide.:

5 Metrics

Question 12 Do you agree that the metrics suggested in Section 5 'Metrics' of the consultation paper (TER, TPER and FEE) should be used to set performance requirements for the Future Homes and Buildings Standards?

Not Answered

If you selected answer options b or e, please provide further information here.:

6 Updated guidance and minimum standards

Question 13 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

If you selected answer options b or c, please provide further information here.:

Question 14 Do you agree with the proposal to include additional guidance around heat pump controls for homes, as set out in Section 6 of draft Approved Document L, Volume 1: Dwellings?

b. Yes, and I want to provide additional suggestions or information to support my view

If you selected answer options b or c, please provide further information here.:

Yes, and in order to satisfy the requirements of 10.2(b) to identify where to find appliance manuals and other important documentation, there should be a requirement for long-term availability of manuals online, with QR codes and/or short links via a stable redirection service making it easy for home owners to access the information.

Question 15 Do you agree that operating and maintenance information should be fixed to heat pump units in new homes?

a. Yes

If you selected answer options b or c, please provide further information here.:

Question 16 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?

Not Answered

If you selected answer options b or c, please provide further information here.:

Question 17 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?

Not Answered

If you selected answer options b or c, please provide further information here.:

Question 18 Do you agree with the proposed sizing methodology for hot water storage vessels for new homes?

Not Answered

If you selected answer options b or c, please provide further information here.:

Question 19 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?

Not Answered

If you selected answer options b or c, please provide further information here.:

Question 20 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?

Not Answered

If you selected answer options b or c, please provide further information here.:

Question 21 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?

Not Answered

If you selected answer options b or c, please provide further information here.:

Question 22 Do you agree that lifts, escalators and moving walkways in new buildings (but not when installed withing a dwelling) should be included in the definition of fixed building services?

a. Yes

If you selected answer options b or c, please provide further information here.:

Question 23 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?

Not Answered

If you selected answer options b or c, please provide further information here.:

Question 24 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?

Not Answered

If you selected answer option a, please provide comments here.:

7 Material Change of Use

Question 25 Should we set whole-building standards for dwellings created through a material change of use?

Not Answered

If you selected answer option c, please provide further information here.:

Question 26 Should the proposed new MCU standard apply to the same types of conversion as are already listed in Approved Document L, Volume 1: Dwellings?

Not Answered

If you selected answer option c or d, please provide further information here.:

Question 27 Should different categories of MCU buildings be subject to different requirements?

Not Answered

If you selected answer option b, please provide further information here.:

Question 28 Which factors should be taken into account when defining building categories? (check all those that apply)

Not answered

Please provide additional information to support your view.:

Question 29 Do you agree with the illustrative energy efficiency requirements and proposed notional building specifications for MCU buildings?

Not Answered

Question 30 If you answered no to the previous question, please provide additional information to support your view. Select all that apply.

The requirements are:

Not applicable

If you selected answer option "other", please provide further information here.:

Question 31 Do you agree with using the metrics of primary energy rate, emission rate and fabric energy efficiency rate, if we move to whole dwelling standards for MCU buildings?

Not Answered

If you selected answer option b or c, please provide further information here.:

Question 32 Under what circumstances should building control bodies be allowed to relax an MCU standard?

Not Answered

If you selected answer option b, please provide further information here.:

Question 33 Do you have views on how we can ensure any relaxation is applied appropriately and consistently? Please select all that apply:

Not answered

If you selected answer option "other", please provide further information here.:

Question 34 Should a limiting standard be retained for MCU dwellings?

c. No, it is not strict enough

If you selected answer option a or e, please provide further information here.:

If the MCU assessment moves to a whole building approach, it is essential that limiting standards are still applied to guard against the risk of poor ventilation with condensation and mould developing. But the limits need to be strengthened (e.g. on heat loss) to ensure that occupants benefit also from lower space heating demand.

Question 35 *If a limiting standard is retained, what should the limiting standard safeguard against? Please select all that apply:*

risk of moisture, damp and mould, high energy demand and energy bills (*please provide recommended values referring to ADL volume 1 Table 4.3*)

If you selected "high energy demand and energy bills" or "other", please provide further information here.:

Question 36 *Do you wish to provide any evidence on the impacts of these proposals including on viability?*

b. No

If you selected answer option a, please provide further information here.:

Question 37 *Do you agree that a BREL report should be provided to building control bodies if we move to energy modelling to demonstrate compliance with MCU standards*

Not Answered

If you selected answer options c or d, please provide further information here.:

Question 38 *Do you agree that consumers buying homes created through a material change of use should be provided with a Home User Guide when they move in?*

a. Yes

If you selected answer options b or c, please provide further information here.:

Question 39 *Do you agree that homes that have undergone an MCU should be airtightness tested?*

b. Yes, and I'd like to provide further information

If you selected answer options b or c, please provide further information here.:

Yes, because ventilation losses can be a significant cause of heat loss. But air tightness must be coupled with the appropriate ventilation approach, hence the need for limiting standards as above.

8 Real-world performance of homes

Question 40 *Do you think that we should introduce voluntary post occupancy performance testing for new homes?*

b. Yes, and I'd like to provide further information

If you selected answer options b or c, please provide further information here.:

Yes: this is essential to drive up the quality of house building. The Trust would therefore like to see mandatory performance testing via random sampling of new homes to ensure standards are improved.

Question 41 *Do you think that the government should introduce a government-endorsed Future Homes Standard brand? And do you agree permission to use a government-endorsed Future Homes Standard brand should only be granted if a developer's homes perform well when performance tested? Please include any potential risks you foresee in your answer.*

c. Yes, but I think there are risks associated with introducing a government-endorsed brand

If you selected answer options b or d, please provide further information here.:

Yes, but the Trust does not consider that simply demonstrating compliance with the proposed Building Regulations should be enough to merit the application of the branding. Such branding should be reserved for higher specification buildings which go significantly beyond the current proposals, such as the contender specifications 3-5 in the Future Homes Hub task group report. It is also essential that buildings pass all the tests to gain branding.

Question 42 Do you agree with the proposed changes to Approved Document F, Volume 1: Dwellings to improve the installation and commissioning of ventilation systems in new and existing homes?

a. Yes

If you selected answer options b or c, please provide further information here.:

Question 43 Do you agree with the proposal to extend Regulation 42 to the installation of mechanical ventilation in existing homes as well as new homes?

a. Yes

If you selected answer options b or c, please provide further information here.:

Question 44 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?

Not Answered

If you selected answer options b or c, please provide further information here.:

Question 45 Are you aware of any gaps in our guidance around commissioning heat pumps, or any third-party guidance we could usefully reference?

Not Answered

If you selected answer option a, please provide further information here.:

Question 46 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?

Not Answered

If you selected answer options b or c, please provide further information here.:

Question 47 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?

Not Answered

If you selected answer options b or c, please provide further information here.:

Question 48 Do you think the additional information we intend to add to the Home User Guide template, outlined above, is sufficient to ensure home occupants can use their heat pumps efficiently?

Not Answered

If you selected answer options b or c, please provide further information here.:

Question 49 If you are a domestic developer, do you use, or are you planning to use, the Home User Guide template when building homes to the 2021 uplift? Please give reasons in your response.

Not Applicable

Please provide further details here. :

Question 50 Do you have a view on how Home User Guides could be made more useful and accessible for homeowners and occupants, including on the merits of requiring developers to make guides available digitally? Please provide evidence where possible.

a. Yes, (please provide further details)

If you selected answer option a, please provide further information here.:

Yes: the Trust is of the view that Home User Guides are an important means of ensuring occupants understand how to get the best from the various fixed systems in the house. The challenge is how to ensure that the information is passed to the next occupant of the home. A paper manual might have been lost or discarded by a careless previous occupant, but a digital version might not necessarily be accessible for the lifetime of the house or equipment. A combination of approaches is probably needed.

Question 51 Do you think that there are issues with compliance with Regulations 39, 40, 40A and 40B of the Building Regulations 2010? Please provide evidence with your answer.

Not Answered

Please provide justification here. :

Question 52 Do you think that local authorities should be required to ensure that information required under Regulations 39, 40, 40A and 40B of the Building Regulations 2010 has been given to the homeowner before issuing a completion certificate?

b. Yes, and I'd like to provide further information

If you selected answer options b or c, please provide further information here.:

Yes: If there is evidence that guidance to home owners is not being provided correctly by developers, then it is important to address this. The Trust considers that local authorities already have many responsibilities in the area of development control, and any additional responsibilities must be funded and not burdensome. Perhaps some form of random inspection coupled with the power to fine developers who have not complied would incentivise compliance.

9 Heat Networks

Question 53 Do you agree that new homes 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 Future Homes or Buildings Standard?

Not Answered

If you selected answer options b or c, please provide further information here.:

Question 54 Do you agree that newly constructed district heating networks (i.e., those built after the Future Homes and Buildings Standard comes into force) should also be able to connect to new buildings using the sleeving methodology?

Not Answered

If you selected answer options b or c, please provide further information here.:

Question 55 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?

Not Answered

If you selected answer options b or c, please provide further information here.:

Question 56 Do you agree that heat networks' available capacity that does not meet a low carbon standard should not be able to supply heat to new buildings?

Not Answered

If you selected answer option b, please provide further information here.:

Question 57 What are your views on how to ensure low-carbon heat is used in practice?

Please provide any comments here.:

Not answered

Question 58 Are there alternative arrangements for heat networks under the Future Homes and Building Standards that you believe would better support the expansion and decarbonisation of heat networks?

Please provide any comments here.:

Not answered

10 Smart Meters

Question 59 Do you agree that the draft guidance provides effective advice to support a successful smart meter installation in a new home, appropriate to an audience of developers and site managers?

Not Answered

If not, please provide suggestions for how the draft guidance could be improved. Please provide evidence and sources for your statements where appropriate. :

Question 60 Do you agree that voluntary guidance referenced in draft Approved Document L, Volume 1: Dwellings is the best approach to encouraging smart meters to be fitted in all new domestic properties?

Not Answered

If not, is there anything else you think the government should be doing to ensure that smart meters are fitted in all new build properties? :

11 Accounting for exceptional circumstances

Question 61 Do you agree that it should be possible for Regulation 26 (CO2 emission rates) to be relaxed or dispensed with if, following an application, the local authority or Building Safety Regulator concludes those standards are unreasonable in the circumstances?

b. No *(please provide justification)*

If you selected answer option b, please provide further information here.:

No: the Building Regulations should be the minimum standards for buildings. The Trust is disappointed that there has not been a swifter movement to higher standards. The example given of relaxing the standards to participate in a hydrogen heating trial does not give sufficient justification. Allowing local authorities to resile from the regulations could lead to very poor outcomes in areas where there is pressure from developers to relax other requirements such as affordable housing supply.

Question 62 If you responded yes to the previous question, please share any examples of circumstances where you think it may be reasonable for a local authority to grant a relaxation or dispensation.

Please share any examples here. :

Not applicable

Question 63 Do you think that local authorities should be required to submit the applications they receive, the decisions they make and their reasoning if requested?

b. Yes, and I'd like to provide further information

If you selected answer options b or c, please provide further information here.:

If this power were to be introduced, it is essential that the public has access to this information, and that none of it is withheld for reasons of commercial confidentiality.

Question 64 Are there any additional safeguards you think should be put in place to ensure consistent and proportionate use of this power?

Please provide any comments here.:

Not answered

12 Legislative changes to the energy efficiency requirements

Question 65 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

If you selected answer options b or c, please provide further information here.:

Question 66 Do you agree that regulations 25A and 25B will be redundant following the introduction of the Future Homes and Buildings Standards and can be repealed?

c. No (please provide justification)

If you selected answer options b or c, please provide further information here.:

No, the Trust does not consider Regulation 25B to be redundant. That regulation aims for new buildings to be “nearly zero-energy”. The Trust does not accept the government's view that the proposed Future Homes standard as set out in the revision to the Building Regulations goes far enough in reducing energy demand from buildings. The idea that buildings will be “zero carbon ready” principally because their services are entirely electric places a huge burden on the decarbonisation of the grid when there will be increased electricity demand for heating and transportation. Higher specifications for buildings are definitely possible, and Regulation 25B should be retained until these are in place.

13 A review of our approach to setting standards

Question 67 Do you agree that the Home Energy Model should be adopted as the approved calculation methodology to demonstrate compliance of new homes with the Future Homes Standard?

Not Answered

If you selected answer options b or c, please provide further information here.:

Question 68 Please provide any comments on the parameters in the notional building.

Please provide any comments here.:

Not answered

Question 69 *Minimum standards already state that heat pumps should have weather compensation and we would like to understand if stakeholders think this is enough to ensure efficiency of heat pumps under the varying weather conditions across England. Should the notional building use local weather?*

Not Answered

Please provide any evidence you have on the unintended consequences that could arise as a result of using local weather in the notional building. If possible, please comment on the impact on the construction industry in terms of design and building feasibility. We also welcome views on whether weather compensation is sufficient to ensure heat pump efficiency.:

Question 70 *Do you agree with the revised guidance in The Future Homes Standard 2025: dwelling notional buildings for consultation no longer includes the average compliance approach for terraced houses?*

Not Answered

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

Question 71 *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?*

Not Answered

Please provide any further evidence.:

Question 72 *Do you agree with the proposed approach to determine U-values of windows and doors in new dwellings?*

Not Answered

Please provide any further evidence.:

Question 73 *Do you agree with the proposal to remove the default y-value for assessing thermal bridges in new dwellings?*

Not Answered

If you selected answer options b or c, please provide further information here.:

Question 74 *Do you have any information you would like to provide on the homes built to the Future Homes Standard using curtain walling?*

Please provide any comments here.:

Not answered

Question 75 *Do you agree with the methodology outlined in the NCM modelling guide for the Future Buildings Standard?*

Not Answered

If you selected answer option b, please provide further information here.:

Question 76 *Please provide any further comments on the cSBEM tool which demonstrates an implementation of the NCM methodology.*

Please provide any comments here.:

Not answered

Question 77 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.

Please provide any comments here.:

Not answered

14 Transitional Arrangements

Question 78 Which option describing transitional arrangements for the Future Homes and Buildings Standard do you prefer (page 83)? Please use the space provided to provide further information and/or alternative arrangements.

a. Option 1

Please provide further information or suggest alternative transitional arrangements with your rationale and supporting evidence.:

Option 1, so that the new requirements are brought in as fast as possible. Developers have already had long enough to adapt, and we are in a climate emergency.

Question 79 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 (please provide further information)

If you selected answer option a, please provide further information here.:

There may, in some limited circumstances, be a need to amend planning permissions, but there are already mechanisms such as Variation of Conditions applications which can achieve this. There must still be scrutiny of changes in permission to ensure that the local plan is complied with as a whole.

Question 80 Do you agree that the 2010 and 2013 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 Future Homes and Buildings Standards?

a. Yes

If you selected answer option b, please provide further information here.:

Question 81 What are your views on the proposals on page 85 and do you have any additional evidence to help us reach a final view on the closing of historical transitional arrangements? Please provide any comments here.:

Not answered

15 Part O – Call for Evidence

Question 82 Part O does not apply when there is a material change of use. Should it apply?

a. Yes

Please provide more details about why Part O should/should not apply to a material change of use and, if possible, point to existing evidence/examples that demonstrates your view.:

Yes, homes created through conversion of existing buildings might be at risk of overheating and should therefore be included in Part O.

Question 83 *Apart from material change of use, is there anything missing from the current scope of Part O?*

Not Answered

Please provide further information here.:

Question 84 *Can you provide evidence on how the addition of extensions or conservatories to domestic buildings can impact overheating risk on an existing building?*

Not Answered

If you selected answer option a, please provide further information here.:

Question 85 *We are currently reviewing Part O and the statutory guidance in Approved Document O. Do you consider there to be omissions or issues concerning the statutory guidance on the simplified method for demonstrating compliance with requirement O1, for buildings within the scope of requirement O1*

Not Answered

If you selected answer option a, please provide further information here.:

Question 86 *Do you consider there to be omissions or issues concerning the statutory guidance on the dynamic thermal modelling method for demonstrating compliance with requirement O1 for all residential buildings?*

Not Answered

If you selected answer option a, please provide further information here.:

Question 87 *Do you consider there to be omissions or issues concerning the statutory guidance on ensuring the overheating mitigation strategy is usable for buildings within the scope of requirement O1?*

Not Answered

If you selected answer option a, please provide further information here.:

Question 88 *Do you consider there to be omissions or issues concerning the statutory guidance on protection from falling?*

Not Answered

If you selected answer option a, please provide further information here.:

Question 89 *Are you aware of ways that Approved Document O could be improved, particularly for smaller housebuilders?*

a. Yes, (please provide justification)

If you selected answer option a, please provide further information here.:

While this may not be a deficiency in Part O of the Building Regulations, the Trust does have evidence to offer about how the Building Regulations interact with the planning system, particularly where larger housebuilders are concerned. Extent of glazing, provision of external shading, house orientation, and the opportunities for through flows of air are key factors in managing overheating without the introduction of mechanical cooling. Local plan policies rarely go into any detail on such matters, which makes it very hard for planners to give suitable weight to these issues when advising on or determining applications. In fact, applications for small numbers of houses would probably stand more chance of being scrutinised properly. Judging from recent large housing sites near Durham, the manner in which plots are laid out by volume housebuilders is almost entirely driven by the alignment of the access roads, and house orientation has had little or no influence on the layout. The planning system needs to give significant weight to these aspects of Building

Regulations where compliance must be tested at the planning application, rather than the construction stages.

Question 90 Does Regulation 40B require revision?

Not Answered

If you selected answer option a, please provide further information here.:

Question 91 Do you consider there to be omissions or issues concerning the statutory guidance on providing information?

Not Answered

If you selected answer option a, please provide further information here.:

Question 92 Are there any improvements that you recommend making to the information provided about overheating in the Home User Guide template?

Not Answered

If you selected answer option a, please provide further information here.:

Question 93 Are there any omissions or issues not covered on page 90 with the statutory guidance in Approved Document O that we should be aware of?

Not Answered

If you answered yes, please provide more details including suggestions on ways to improve the statutory guidance and point to existing evidence/examples that demonstrates why the gaps or issues you have identified should be reviewed as a priority.:

16 Equalities and Impact Assessments

Question 94 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. If possible, please provide evidence to support your comments.

Please provide any comments here.:

Not answered

Question 95 Please provide any feedback you have on the impact assessments.

Please provide any comments here.:

Not answered