

## Response ID ANON-1VA9-1DD9-K

Submitted to Review of energy efficiency requirements and related areas of Building Regulations  
Submitted on 2023-11-30 11:28:20

### Introduction

What is your name?

Name:  
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What is your email address?

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Are you responding as an individual or representing the views of an organisation?

Organisation

What is the name of your organisation?

If responding on behalf of an organisation, please enter the organisation's name here.:  
Royal Town Planning Institute

The Department of Finance would like your permission to publish your consultation response. Please indicate if you wish your response to be treated as confidential.

No

If you wish your response to be treated as confidential, please provide your justification for doing so.:

We may wish to contact you again in the future, but we require your permission to do so. Are you content for the Department of Finance to contact you again in relation to this consultation exercise?

Yes

### Section 2A: Background- legislative considerations and policy contexts

Q2A.1 Do you agree that coming into force considerations would be best addressed through review of Article 19 of the Order, rather than by transitional provisions of any amendment to Part F?

Not Answered

Comment (if any):

Q.2A.2 Do the current arrangements here, with up to three year phasing in period, support an argument for a more ambitious uplift, as it provides scope for processes to be developed and training to take place?

Yes

Comment (if any):

We support the three year phasing in period, however, planners and other implementing professionals need to have the appropriate support, time and resourcing to undertake training in this period.

Q.2A.3 What do you consider should be the maximum time permissible for previously approved applications to commence on site after the introduction of the new standards?

Comment (if any):

Three years, to coincide with the three year phasing in period.

Q.2A.4 Do you have a view on any specific regulations or definitions which would benefit from reform, with a view to simplifying or clarifying Part F regulations? If so, please provide details.

Comment (if any):

## Section 2B: Background (developments elsewhere)

Q.2B.1 Have you modelling information directly comparing the compliant or 'notional' buildings across administrations, ideally using an up to date and consistent methodology for comparative analysis purposes (e.g. SAP 10)? If so, please provide a link or information on how to access this.

No

Comment (if any):

Q.2B.2 Are there any additional local characteristics or issues around our local industry that the Department should be mindful of as we take forward proposals?

Comment (if any):

Q.2B.3 Do you agree with the proposed timing of uplifts planned for 2023/24 (Phase 3) and 2026/27 (Phase 4), which are intended to follow developments in England by 18-24 months in each case?

Not Answered

Comment (if any):

## Section 3: Pre-consultation Phase 3 proposals for dwellings

Q.3.1 The Department's programme of proposals seeks to implement a 'Phase 3' uplift here in 2023 (likely now to be in 2024) to reflect the changes above. Do you agree that this is appropriate and that this should cover the extent of issues outlined in this section?

Yes

Comment (if any):

Yes, but we also need to see behaviour change, for instance, installing EV charging points at each new dwelling is not the answer – this still requires cars to be on the road, with the associated carbon production of making cars, building roads, generating electricity etc. Far better to encourage behaviour change to active travel and public transport, and perhaps car share or car club schemes for those trips impossible by public transport.

## Section 3A: Part F (Conservation of fuel and power) proposals for new dwellings, Phase 3

Q.3A.1 Do you agree that a new primary energy metric and TPER targets should be introduced?

Not Answered

Comment (if any):

Q.3A.2 Are you content that a FEES metric and targets should be introduced in line with the assessment in England?

Not Answered

Comment (if any):

Q.3A.3 Could you provide a specification that house builders are actually adopting in practice in order to be compliant with England's current requirements? Please provide details and commentary or explanation.

Not Answered

Comment (if any):

Q.3A.4 Do you think the proposed Notional Dwelling fabric is suitable for Option 1 and Option 2's proposals?

Not Answered

Comment (if any):

Q.3A.5 Would you agree with replication of England's limiting U-values? We would be grateful for any evidence or reasoning if you think these should remain in line with the Republic of Ireland or be otherwise different.

Not Answered

Comment (if any):

Q.3A.6 Do you agree that the Department should not introduce a cost (SAP rating) metric assessment?

Not Answered

Comment (if any):

Q.3A.7 Do you agree that a delivered energy or energy use intensity metric is not needed as part of the Phase 3 uplift?

Not Answered

Comment (if any):

Q.3A.8 Do you agree that a renewable energy ratio assessment is not needed as part of the Phase 3 uplift?

Not Answered

Comment (if any):

Q.3A.9 Have you any comment to make on the metrics the Department is proposing to adopt for Phase 3?

Not Answered

Comment (if any):

Q.3A.10 Have you any opinion or evidence to support limiting the extent of variance for any individual dwelling when using a whole-block average performance to demonstrate compliance with TER, TPER or TFEE assessments?

Not Answered

Comment (if any):

Q.3A.11 Do you agree that the changes to the airtightness testing regime should include the measures introduced in England, but provide for a lower maximum permissible air permeability level than 8.0 m<sup>3</sup>/(h.m<sup>2</sup>) @ 50 Pa? If so, what should the maximum permissible level be?

Not Answered

Comment (if any):

Q.3A.12 Do you agree that all current fuel factors in TBF1 should be removed, so that targets (TER) are no longer relaxed where higher carbon fuels are used?

Not Answered

Comment (if any):

Q.3A.13 Are you content with the likely outcomes for biofuels under Option 1 and the proposed Primary Energy metric? If not, how should the regime be less, or more, permissive towards biofuels?

Yes

Comment (if any):

Q.3A.14 Have you any evidence or concern around the extent of renewable generating technology expected under either Option 1 or 2?

Not Answered

Comment (if any):

Q.3A.15 Have you any comment on the proposed revised treatment of non-export connections?

Not Answered

Comment (if any):

Q.3A.16 Do you agree that new heating systems should be designed and installed to operate with a maximum flow temperature of 55°C as per England's current guidance? If not please provide evidence to support a different maximum flow temperature, or position.

Not Answered

Comment (if any):

Q.3A.17 Do you agree that replication of Sections 5 and 6 of England's Approved Document on building services and controls guidance into the next version of TBF1 would be appropriate for the Phase 3 proposals?

Not Answered

Comment (if any):

Q.3A.18 Do you have any comments or issues around how UK and EU Ecodesign requirements might interact with Part F guidance requirements at Phase 3 or over the longer term?

Comment (if any):

Q.3A.19 Do you agree that designers, should be able to demonstrate a water efficiency assessment as per Appendix A of England's Approved Document G?

Not Answered

Comment (if any):

Q.3A.20 Have you any suggestion or further insight on how heat networks should be assessed under the Phase 3 proposals? If so, please outline the issue and suggested handling in your response.

Not Answered

Comment (if any):

Q.3A.21 Is the specification of the heat pump proposed for Option 2 appropriate? If not, how should it be amended?

Not Answered

Comment (if any):

Q.3A.22 Do you have concerns or evidence on the viability and risks associated with either Option 1 or Option 2?

Not Answered

Comment (if any):

Q.3A.23 Should the Department implement Option 1 or Option 2 for the Phase 3 uplift?

Comment (if any):

Q.3A.24 Have you any comment on how the Option 2 specification should be improved, for Phase 3 or Phase 4 or 5?

Comment (if any):

Q.3A.25 Do you agree that the Department should adopt the new BREL type format for notice of compliance with emissions, renewables and other requirements in keeping with England's provisions? See Appendix B of Approved Document L1 (2021) for further detail

Not Answered

Comment (if any):

Q.3A.26 Do you agree that the Department's guidance should additionally require provision of a new non-technical Home User Guide in keeping with England's provisions?

Yes

Comment (if any):

Q.3A.27 Do you agree that the Department should require geo-located photographs to be lodged to support evidence of the as-built construction?

Comment (if any):

Yes

Section 3B: Part F (Conservation of fuel and power) work to existing dwellings, Phase 3.

Q.3B.1 Do you support the addition of a Primary Energy and FEES metric assessment alongside the current Carbon emissions metric assessment when using the Equivalent Target Approach to demonstrate compliance in cases of work to existing dwellings?

Not Answered

Comment (if any):

Q.3B.2 Do you have any particular concerns or insight on the U-values used in standards related to existing dwellings for any of the various situations in other administrations?

Not Answered

Comment (if any):

Q.3B.3 Do you agree that our U-value standards should be largely in line with the proposed standards for new building elements in cases of extensions and replacement elements?

Not Answered

Comment (if any):

Q.3B.4 Do you agree that our U-value standards should be largely in line with the values used in England, in cases of a material change of use of a building, for renovated elements and where a change of energy status occurs?

Not Answered

Comment (if any):

Q.3B.5 Are there any particular areas where alternative performance values for fabric elements (such as EWI) should be considered? If so please provide evidence and an indication of the value you consider appropriate.

Not Answered

Comment (if any):

Q.3B.6 Do you agree that a maximum glazing area assessment should continue to form part of the requirements, where a material change of use to form a dwelling occurs?

Not Answered

Comment (if any):

Q.3B.7 Do you agree that traditional construction should be referenced out to third party guidance, with a greater scope for bespoke consideration in these situations?

Not Answered

Comment (if any):

Q.3B.8 Do you agree that the Boiler Plus measures introduced in England in 2018 and thermostatic control measures introduced in 2022 should be replicated and included in revised guidance here?

Not Answered

Comment (if any):

Q.3B.9 Do you agree that where a new or complete replacement heating system is being installed in an existing dwelling, it should be installed to operate with a maximum flow temperature of 55°C?

Not Answered

Comment (if any):

Q.3B.10 Do you agree that both an emissions and primary energy performance assessment should be applied to boiler replacements where a change of fuels is proposed?

Not Answered

Comment (if any):

Q.3B.11 Do you have information or evidence to help assure the Department that reversion from liquid biofuels to conventional home heating oil need not be of concern?

Not Answered

Comment (if any):

Q.3B.12 Do you agree that Technical Booklet F1 should be amended to follow the minimum services provisions of Section 5 and 6 of England's Approved Document L1, subject to further NIBRAC and public consultations? Have you any 'lessons learned' from the roll-out of these provisions elsewhere which merit consideration?

Not Answered

Comment (if any):

Q.3B.13 Do you agree that the consequential improvements similar to those applicable to extensions to dwellings in Wales should apply here?

Not Answered

Comment (if any):

Q.3B.14 Do you have any evidence or insight on the major renovation measures in place in the Republic of Ireland to suggest the Department should prioritise a similar approach here? If so, please include the evidence with your response.

Not Answered

Comment (if any):

### Section 3C: Part K (Ventilation) dwellings- Phase 3

Q.3C.1 Do you agree that Technical Booklet K (TBK) should be split into two (similar to current Part F guidance), and that relevant guidance currently cited within the Ventilation Compliance Guides should be integrated within them?

Not Answered

Comment (if any):

Q.3C.2 Do you agree that Technical Booklet K should cite background ventilator sizes in line with England and Wales?

Not Answered

Comment (if any):

Q.3C.3 Do you agree that revised TBK guidance should align with the three systems (natural, continuous mechanical extract and continuous supply and extract/MVHR) in keeping with air-permeability thresholds England and Wales?

Not Answered

Comment (if any):

Q.3C.4 Do you have any evidence or guidance that should prompt the Department to develop an independent approach to noise of mechanical ventilation systems in dwellings?

Not Answered

Comment (if any):

Q.3C.5 Do you agree that the updated performance based specification in England's ADF1 (Ventilation – dwellings) should be replicated in equivalent guidance here?

Not Answered

Comment (if any):

Q.3C.6 Do you support amendment of the Technical Booklet K guidance in line with the developments in England and Wales, to address ventilation alongside fabric retrofit work?

Not Answered

Comment (if any):

Q.3C.7 Have you any comment or insight on how the Department or others should support skills or cite competence standards for the design, testing and commissioning of ventilation systems in dwellings? Please include relevant details in your response.

Not Answered

Comments (character limit 3000):

Q.3C.8 Have you any other evidence on issues or suggestions on ventilation standards in dwellings, which the Department should consider as part of the review of Park K (Ventilation)?

Not Answered

Comment (if any):

Q.3C.9 Do you agree that CO2 monitoring should be a consideration for Phase 4?

Not Answered

Comment (if any):

Q.3C.10 Do you support inclusion of ventilation guidance to more specifically consider clothes drying, in line with current provisions in Scotland ?

Not Answered

Comment (if any):

Q.3C.11 Do you have any evidence or insight on other aspects of ventilation for dwellings which the Department should take into account?

Comments (character limit 3000):

Not Answered

### Section 3D: Mitigating overheating risks in dwellings – Phase 3

Q.3D.1 Do you agree that local regulation and guidance will be needed to mitigate overheating in new dwellings and residential buildings?

Yes

Comment (if any):

Q.3D.2 Do you agree with the proposed course of action whereby DSM modelling to TM59 requirements would be used in more complex situations but a simplified approach, largely following Scotland's proposals, could be applied in more straightforward situations?

Yes

Comment (if any):

Q.3D.3 Should the new requirements only apply to new-build situations (i.e. to the erection of a building) or should it also apply to material change of use situations and/or extensions and structural alterations?

Not Answered

Comment (if any):

Q.3D.4 Should the noise assessment levels be based on planning issues, or should bespoke noise assessment and testing be expected where openings are proposed for purge cooling of rooms in dwellings or similar buildings?

Option 1

Comment (if any):

Based on planning issues

Q.3D.5 Are you content that the guidance in Appendix D of the current Technical Booklet K provides sufficient clarity on pollution assessment where natural purge ventilation for cooling is proposed?

Comment (if any):

Q.3D.6 Do you agree that guidance should be revised to support a 1.1m high guarding a openings for purge cooling, or should the current 800mm height for guarding at windows remain?

Comment (if any):

Not Answered

Q.3D.7 Are there any other issues which should be taken into consideration in terms of the usability of openings for purge cooling?

Comment (if any):

Q.3D.8 Have you any evidence or modelling to indicate if a requirement for cooling could result in new Carbon emissions or Primary Energy targets proposed in Section 3A (see Table 3A.1) being difficult, or impossible, to deliver in practice in some circumstances e.g. single aspect flats next to noisy/polluted roads? If so, please provide details and outputs.

Comment (if any):

Q.3D.9 Can you evidence any 'lessons learned' from roll out of the overheating mitigation policies elsewhere that we should consider?

Comment (if any):

### Section 3E: Electric Vehicle infrastructure- background and Phase 3 proposals for dwellings

Q.3E.1 Do you agree with the proposed approach to use Building Regulations to legislate for EV infrastructure requirements?

Yes

Comment (if any):

Yes for the actual infrastructure requirements, however, we need to take a step back about the actual approach – implementation of EV charging points is still encouraging people to drive, and instead there needs to be behaviour change towards active travel and public transport usage.

Q.3E.2 Do you agree with the proposed approach to follow the technical provisions in England? The Department would be grateful for any comment on the guidance or out-workings there or in other regions.

No

Comment (if any):

Implementation of charging points at the level described is missing the point about the climate crisis. Yes, EV charging points are required for those who absolutely have to drive to make their trips e.g. those with mobility issues or people who live remotely, but in areas of higher public transport accessibility levels, or with walkable or cyclable distances to workplaces, amenities and services, driving should not be the first choice. Carbon is still associated with the manufacture of electric cars, and they require production of electricity to run. There needs to be more investment in public transport, improved walk and cycle routes, and encouragement of behaviour change towards these choices, if we are to really seriously address the climate crisis. More consideration needs to be given to car clubs, where people rent a car on the street for occasional trips e.g. to the DIY store or for a weekend. This approach has successfully been adopted in London over many years. There needs to be a fundamental change in approach to car parking provision, irrespective of the provision of EV charging infrastructure.

Q.3E.3 Do you agree that for new dwellings with associated parking spaces; one CP per dwelling or one per associated parking space (which ever is the lesser) should be required and that, in addition, for those buildings with more than ten associated parking spaces, ducting to the rest of the residential parking spaces to facilitate future installations, should also be required?

No

Comment (if any):

See response to Q.3E.2. Car parking should be limited at new dwellings, as is the case in many English cities, and has been the approach in London over many years. Electric cars still require road space, electricity to run, and huge energy consumption in their manufacture. Behaviour change to active travel and public transport should be the priority and developers should contribute towards this, first and foremost.

Q.3E.4 Do you agree with the proposed limitations 1 and 2 (as outlined in paragraph 3E.34 and 3E.35) restricting the application of the requirements for EV infrastructure at parking spaces associated with new dwellings?

Yes

Comment (if any):

Q.3E.5 Do you think there should be a limitation to the application of the requirements, on the grounds of additional grid connection costs that may accrue to developers as a result of the provision of CPs?

Yes

Comment (if any):

As an alternative, developers should contribute to the improvement of local walking, cycling and/or public transport routes.

Q.3E.6 If the answer to Q 3E.5 is yes, do you think the amount of £3600 (which is currently under review) is appropriate and do you have any comment on how it should be assessed?

Not Answered



Comment (if any):

Q.3E.7 Do you agree that where a major renovation results in a residential building being associated with more than 10 parking spaces, then CPs should be provided at a rate of one per dwelling , or one per associated parking space (whichever is the lesser) and that that ducting should be installed in each associated car parking space, to support the future installation of an EV CP?

Not Answered

Comment (if any):

Q.3E.8 Do you agree with the proposed limitations to these requirements in the case of major renovations, as outlined in paragraph 3E.41-3E.47, or have you any further comment on them?

Not Answered

Comment (if any):

Q.3E.9 Do you agree that where a dwelling is created through a material change of use, a CP should be required at any parking space associated with the new dwelling?

Not Answered

Comment (if any):

Q.3E.10 Do you agree with the proposed limitations to the application of the requirement, where a newly created dwelling is established under a material change of use, as outlined in paragraph 3E.51-3E.55?

Not Answered

Comment (if any):

Q.3E.11 Should a cost cap apply, instead of limiting the number of CPs on the basis of the existing supply, where a new electrical supply connection to the building occurs alongside a major renovation, or a material change of use that creates a new dwelling?

Not Answered

Comment (if any):

Q.3E.12 Should there be a requirement for cable routes to all spaces associated with dwellings newly created by way of a material change of use, in circumstances where a building has more than 10 parking spaces?

Not Answered

Comment (if any):

Q.3E.13 Do you have any other views that you wish to provide on the EV section of the consultation (e.g. the minimum standard of EV charge point or safety and accessibility within the built environment)?

Comment (if any):

Please see comments above on Q.3E.2

Implementation of charging points at the level described is missing the point about the climate crisis. Yes, EV charging points are required for those who absolutely have to drive to make their trips e.g. those with mobility issues or people who live remotely, but in areas of higher public transport accessibility levels, or with walkable or cyclable distances to workplaces, amenities and services, driving should not be the first choice. Carbon is still associated with the manufacture of electric cars, and they require production of electricity to run. There needs to be more investment in public transport, improved walk and cycle routes, and encouragement of behaviour change towards these choices, if we are to really seriously address the climate crisis. More consideration needs to be given to car clubs, where people rent a car on the street for occasional trips e.g. to the DIY store or for a weekend. This approach has successfully been adopted in London over many years. There needs to be a fundamental change in approach to car parking provision, irrespective of the provision of EV charging infrastructure.

Yes

#### Section 4A: Part F (Conservation of fuel and power) proposals for new buildings other than dwellings Phase 3

Q.4A.1 Do you agree that the Department should adopt the same Primary energy metric for new non-domestic building assessments, as proposed for domestic buildings?

Not Answered

Comment (if any):

Q.4A.2 Do you agree that the Department should develop proposals to adopt the Notional Building specification in line with England's Part L 2022 specification and requirements? If not, why not? please provide evidence of why and how the specification should be altered.

Not Answered

Comment (if any):

Q.4A.3 Do you agree that the Department should develop proposals to adopt the limiting fabric U-values in line with England's Part L 2022 requirements? If not, please provide evidence of how the specification is impractical here and what alternative standard should be required.

Not Answered

Comment (if any):

Q.4A.4 Do you agree that the Department should develop proposals to adopt maximum permissible air-permeability values for new builds of 5.0 m<sup>3</sup>/(h.m<sup>2</sup>) @50Pa, or should it maintain consistency with England's approach?

Comment (if any):

Q.4A.5 Do you agree that the Department should develop proposals to adopt the limiting services standards in line with the requirements in England, Wales and Scotland? If not, please provide evidence of how the specification is impractical here and what alternative standard should be required.

Not Answered

Comment (if any):

Q.4A.6 Do you agree that the Department should develop proposals to include the limiting services standards within the Technical Booklet guidance documents, or is a more explanatory, separate Non-domestic Building Services Compliance Guide preferable? Please provide reasoning in your response.

Comment (if any):

Q.4A.7 Do you agree that the Department should develop proposals to require BACS in new buildings? If so, should the threshold be at 290kW or 180kW? Please provide evidence or reasoning for your view.

Q.4A.8 What is your view on the value of requiring either TM54 modelling of actual energy use in buildings >1000m<sup>2</sup> (as applicable in England) or Scotland's conversion to Zero Direct Emissions Heating reports?

Comment (if any):

#### Section 4B: Part F (Conservation of fuel and power) proposals for work to existing buildings other than dwellings Phase 3

Q.4B.1 Do you support the addition of a Primary Energy metric assessment alongside the current Carbon emissions metric assessment when using the Equivalent Target Approach to demonstrate compliance in cases of work to existing buildings?

Not Answered

Comment (if any):

Q.4B.2 Do you have any particular concerns or insight on the U-values used in standards related to existing buildings other than dwellings for any of the various situations in other administrations?

Not Answered

Comment (if any):

Q.4B.3 Do you agree that our U-value standards should be largely in line with limiting standards for new building elements in cases of extensions and replacement elements on buildings other than dwellings?

Not Answered

Comment (if any):

Q.4B.4 Do you agree that our U-value standards should be largely in line with the values used in England, in cases of a material change of use of a building, for renovated elements and where a change of energy status occurs involving buildings other than dwellings?

Not Answered

Comment (if any):

Q.4B.5 Are there any particular areas where alternative performance values for renovated elements or services should be considered for buildings other than dwellings? If so please provide evidence and an indication of the value you consider appropriate.

Not Answered

Comment (if any):

Q.4B.6 Do you agree that a maximum glazing area assessment should continue to form part of the requirements for extensions and be included where a material change of use occurs to buildings other than dwellings?

Not Answered

Comment (if any):

Q.4B.7 Do you agree that traditional construction should be referenced out to third party guidance, with a greater scope for bespoke consideration in situations applicable to traditionally constructed buildings other than dwellings?

Not Answered

Comment (if any):

Q.4B.8 Do you agree that where a new or complete replacement heating system is being installed in an existing building, it should be installed to operate with a maximum flow temperature of 55°C?

Not Answered

Comment (if any):

Q.4B.9 Do you agree that Technical Booklet F2 should be amended to follow the minimum services provisions of Section 5 and 6 of England's Approved Document L2, subject to further NIBRAC and public consultations? The Department would be grateful to understand any 'lessons learned' from the roll-out of these provisions elsewhere.

Not Answered

Comment (if any):

Q.4B.10 Do you have any evidence on the success or otherwise of consequential improvements? if so, please include this with your response.

Not Answered

Comment (if any, character limit 3,000):

Q.4B.11 Do you think consequential improvement requirements should be a. retained (i.e. maintained in keeping with England), b. amended (for example to apply where the principal works are of a particular value, rather than being based on the total floor area of the existing building), c. extended to apply to all extensions, or otherwise extended; or d. revoked? Please provide a reasoning for your response and evidence that supports any changes you would propose.

Comment (if any):

Q.4B.12 Do you have any evidence or insight on the major renovations measures in place in the Republic of Ireland to suggest the Department should prioritise a similar approach here for buildings other than dwellings? If so please include the evidence with your response.

Not Answered

Comment (if any):

#### Section 4C: Part K (Ventilation) buildings other than dwellings Phase

Q.4C.1 Do you agree that Technical Booklet K should take a similar approach to noise and installation of ventilation systems, as England and Wales?

Not Answered

Comment (if any):

Q.4C.2 Do you agree that Technical Booklet K should replicate the proposed performance based guidance outlined for dwellings?

Not Answered

Comment (if any):

Q4C.3 Do you agree that Technical Booklet K (TBK) should bring the Appendix D guidance on polluted external air into the main body text of TBK?

Not Answered

Comment (if any):

Q4C.4 Do you agree that the list of sources for design guidance provided in ANNEX F should be replicated in the new TBK, for application to specialist building types?

Not Answered

Comment (if any):

Q4C.5 Are there any specific concerns or issues with the updated references proposed in the Table in ANNEX F, that the Department should consider? If so, please provide details.

Not Answered

Comment (if any):

Q4C.6 Do you agree that requirements for air quality monitoring, similar to those introduced in England and Wales, should be included in the Phase 3 uplift package to Part K (Ventilation)?

Not Answered

Comment (if any):

Q4C.7 Question omitted following correction issued October '23

Not Answered

Comment (if any):

Q4C.8 Do you agree that additional requirements for ventilation in offices, similar to those introduced in England and Wales, should be included in the Phase 3?

Yes

Comment (if any):

#### Section 4D: Electric vehicle infrastructure- Phase 3 proposals for buildings other than dwellings

Q4D.1 Do you agree with the proposed use of Building Regulations to implement Article 8.2 for the provision of EV charging point infrastructure at buildings other than dwellings?

Yes

Comment (if any):

Q4D.2 Do you agree that ducting infrastructure for one in five parking spaces and one charging point, should be installed when a non-residential buildings with more than 10 non-residential car parking spaces is being erected or is undergoing a major renovation?

Yes

Comment (if any):

Q4D.3 Do you agree with the proposed limitations (outlined in para 4D.13- 4D.18) to the application of EV charging requirements for new non-residential buildings and for major renovations of such buildings? If not, please comment on how should they be changed

Yes

Comment (if any):

Q4D.4 Do you agree that more onerous residential requirements should apply in mixed-use building situations and shared parking arrangements?

No

Comment (if any):

There needs to be a review of why car parking is required for residential elements, irrespective of the provision of EV charging points. Car parking may be required for buildings other than dwellings if for business reasons e.g. transportation of goods, or for those with mobility difficulties, in which case EV charging points should be provided. Car parking itself should be limited for mixed use development, and residents or visitors encouraged to walk, cycle or take public transport where possible.

## Section 5: Considerations for Phase 4 uplifts

Q5.1 Do you agree that, for Phase 4, the Department should expect to replicate measures introduced in England's Future Homes and Future Buildings (2025) in the first instance, or is there a particular administration that we should seek to align with for Phase 4? If possible, please provide supporting evidence for your preference.

Yes

Comment (if any):

Q5.2 Would you support a ban on direct emissions heat generators or combustion appliances, similar to Scotland's measures banning such appliances? (Please take into account your answer to question Q3A.23 on which Option you have supported.)

Not Answered

Comment (if any):

Q5.3 Do you support efforts to more closely align the NCM and targets towards passive house standards, where possible?

Not Answered

Comment (if any):

Q5.4 Have you any advice or evidence as to how further verification measures might help ensure the standard is delivered in practice (please provide details)?

Not Answered

Comment (if any):

Q5.5 Are there any other particular or detailed issues that the Department should be considering for new build Part F requirements for non-domestic buildings as part of Phase 4 developments?

Not Answered

Comment (if any):

Q5.6 Are there any other issues which the Department should be considering for Phase 5? Please note that some further/concurrent issues are discussed in Section 6 which may influence input on this.

Not Answered

Comment (if any):

## Section 6A: National Calculation Methodology issues

Q.6A.1 Do you agree that the local NCM should be consistent with England? If not, please provide thoughts on how it should be varied, for example with the use of a local NI weather file, or with local cost or carbon intensity factors, rather than UK averages, in building regulation assessments.

Not Answered

Comments (if any):

## Section 6B: Embodied Carbon

Q.6B.1 Do you have any comments on EPDs that you would like to bring to the attention of the Department at this stage?

No

Comment (if any):

Q.6B.2 Have you any insight or evidence on the likely professional costs incurred in carrying out a whole lifecycle assessment of carbon in a project? For example, is it likely to be comparable to the cost of a traditional Bill of Quantities? If so, what phases of the lifecycle assessment and data were included?

No

Comment (if any):

Q.6B.3 Have you any opinion or insight on how to address any of the challenges listed? For example, a view on the extent and scope of assessments.

No

Comment (if any):

Q.6B.4 Do you agree that the intricacies and implications of embodied carbon mean it is best considered at a UK wide level and that the Department should concentrate efforts on attending to the current gap in standards compared to other regions, in the first instance?

Yes

Comment (if any):

Q.6B.5 Would you support the development of an advisory Information Note or Appendix to Technical Booklets on Part F to support embodied carbon assessment?

Yes

Comment (if any):

Q.6B.6 Have you any practical suggestions for how circular economy principles may be best encouraged in construction or, if necessary, regulated for in the future?

No

Comment (if any):

## Section 6C: Over-sized new homes

Q.6C.1 Have you any evidence on new build dwelling sizes that should be taken into account in future policy making on larger dwellings?

No

Comment (if any):

Q.6C.2 Do you believe that action should be taken to better highlight the higher total energy demand for large, less spatially efficient dwellings? If so, how should this be best achieved?

Yes

Comment (if any):

Data should be gathered on the performance of new build dwellings.

## Section 6D: Performance gap

Q.6D.1 Do you have any particularly local evidence on design vs as-built performance gaps?

No

Comment (if any):

Q.6D.2 Do you have any evidence or insight supporting specific actions to address specific performance gaps in Parts F or K of the Building Regulations?

No

Comment (if any):