

The Rt Hon Robert Jenrick, MP
Secretary of State for Housing,
Communities & Local Government
MHCLG
2 Marsham Street,
London, SW1P 4DF

Dear Secretary of State,

We are writing to you regarding the current Government consultation on changes to Part L and Part F of the Building Regulations to be included in the proposed Future Homes Standard.

As a group of professionals working in the construction industry we are extremely concerned about the proposals. We feel that they are completely inadequate in the context of the climate and ecological emergency as declared by this government, and will act as a barrier to the UK meeting its carbon emissions targets.

The environmental impact of construction and the built environment is extensive; accounting for around 40% of the UK's carbon emissions. In light of the IPCC's recommendation that global emissions need to be halved by 2030, it is vital that industry regulation is commensurate with the significant share of emissions that the sector is responsible for.

Our four main areas of concern with the proposed Standard are as follows.

1) **The Fabric Energy Efficiency Standard (FEES) should not be scrapped.** It should be kept and upgraded with greatly improved fabric performance targets that go much further, reducing the energy use of all new homes designed in 2025 to net zero.

2) **Energy consumption reporting should be easily understandable.** The use of carbon factors as proposed in this consultation is a step backwards and will disguise poor fabric efficiency through over-reliance on a decarbonised grid. Under the proposed regulations, new homes may end up using more energy than those built to 2013 regulations.

3) **Ambitious Local Authorities should not be stripped of their powers to set higher energy efficiency standards.** Leaders in climate innovation should be supported at this time of greatest need, and the 65% of local authorities that declared climate emergency in 2019 will be unnecessarily held back by this change. The UK will miss legal climate targets without this urgent action.

4) **The Future Homes Standard needs to consider the Embodied Carbon of buildings.** The carbon emissions associated with a building's use only make up a percentage of its total carbon footprint, with embodied carbon (the emissions associated with materials, construction and refurbishments) making up an ever greater share. Embodied Carbon needs to be measured and

declared as well. This is known as a 'Whole Life Carbon' approach to construction and should be applied to all construction projects to represent their true carbon cost.

Whilst we welcome the consultation, the scale of destruction wrought globally by the climate crisis is shocking in its speed and severity, and our response must be proportionate. We urgently require far reaching changes to the regulatory landscape, but we urge you to reconsider the current proposals laid out for the Future Homes Standard. With 150,000 houses built every year, it is imperative that Government policy reflects what the UK needs now and in the future to reach our carbon emissions targets.

Yours Sincerely,

Architects Climate Action Network