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The Rt Hon Michael Gove MP  
Secretary of State for Levelling Up,  
Housing, and Communities  
2 Marsham Street  
London SW1P 4DF  
cc: The Rt Hon. Claire Coutinho MP,  
Secretary of State for Energy Security and Net Zero

Wednesday 27th March 2024

Dear Secretary of State,

**Re: Future Homes and Building Standard (FHS) consultation**

the Edge is an organisation that brings together key organisations and individuals in the built and natural environment and it is pleased to have been able to respond to the online consultation on the Future Homes Standard.

the Edge recognises the high importance and urgency of tackling the combined climate and nature emergency and commend any measures that will provide timely, equitable and adequate solutions to pressing challenges including achieving net zero and ecological recovery. For this reason we support moves in the proposed Future Homes Standard to bring an end to the use of fossil fuels for heating in buildings and make the transition to the use of renewable electricity, especially where this can be generated on site using integrated photovoltaics and other technologies. We also welcome the move to apply energy efficiency requirements to buildings undergoing a Material Change of Use (MCU) and there is strong support for post occupancy performance testing of buildings, without which improvements are difficult to achieve – although we believe that this should become mandatory.

However we are also deeply concerned by a number of issues:

1. The incremental tightening of fabric improvement measures has been brought an end far too soon. We cannot unnecessarily waste energy even, or especially, when it comes from a zero carbon source. Energy efficiency is vitally important to relieve fuel poverty, deliver UK energy security and ensure that the limited capacity of renewable electricity generation and grid connectivity is used as wisely as possible. We must certainly continue to improve the fabric energy efficiency of the UK's building stock – this is not a time to let up.

... continued

2. The need to tackle embodied carbon in construction and buildings has been intentionally and worryingly omitted from this consultation yet is an urgent issue and an important element of being 'net zero ready', that should have been included, if only to establish a strong direction of travel for the reduction of excessive emissions generated by the construction industry. the Edge is a longstanding supporter of the Part Z proposition – see <https://www.istructe.org/resources/climate-emergency/embodied-carbon-regulation/>
3. The greatest challenge faced for the reduction of carbon emissions from the built environment in the UK is the existing stock of inefficient and poorly maintained homes and other buildings, yet the Future Homes proposals barely mentions this challenge and the urgent need to upgrade their performance over a range of aspects including energy use, air quality and overheating; especially when they are already being refurbished and repaired. This is a major omission.
4. The proposals choose to use Primary Energy over Delivered Energy as the main metric for assessing compliance, yet it is an opaque measure to all building owners, operators and occupiers without specialist knowledge and capabilities. Delivered Energy that can be straightforwardly monitored via energy meters and is widely understood should be the metric used, as recommended by the Climate Change Committee for EPCs.

We hope and anticipate that these points can be fully incorporated in the finalised proposals for the Future Homes Standard

Yours sincerely



For the Edge

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the Edge is a built and natural environment think tank and network. It is multi-disciplinary in a landscape remarkable for its abundance of single-discipline institutions. Started as a means of creating a shared space between the architectural and engineering institutions, the Edge is a voluntary group with no staff and multiple stakeholders across the built and natural environment professions. We encourage cross-disciplinary debate and campaign for change that will improve outcomes for society.