



Environmental Audit Committee

Rt Hon Michael Gove MP
Secretary of State
Department for Levelling Up, Housing and Communities
2 Marsham Street
London SW1P 4DF

By email only

21st May 2024

Dear Secretary of State –

Heat resilience and sustainable cooling

The Environmental Audit Committee (EAC) recently undertook an inquiry into heat resilience and Sustainable cooling, over the course of which we received compelling evidence that unseasonably high levels of heat are having serious and widespread impacts on health, wellbeing and economic productivity.ⁱ This is already costing the UK thousands of lives and billions of pounds annually, a situation which is predicted to deteriorate without concerted action. Consequently, we concluded that the social and economic case for accelerating heat adaptation measures in the UK is clear-cut.

Future Homes and Buildings Standards

The heat resilience of homes was a core issue, raised repeatedly throughout our inquiry, and we received extensive evidence from the architecture and building engineering sector, including oral evidence from the Royal Institute of British Architects. We heard that over 4.6 million English homes currently experience summertime overheating. Under a 2°C global warming scenario this is projected to rise to 90% of all UK homes. In our report, published in January 2024, we highlighted the role of Building Regulations in helping to tackle overheating in homes.ⁱⁱ

The Committee notes that your Department launched a consultation on the Future Homes and Buildings Standards (FHBS) in December 2023 – following the conclusion of our evidence gathering but prior to issuing our report – and that this consultation closed in March 2024.ⁱⁱⁱ **I wish to highlight three of our recommendations which pertain to the FHBS, and seek assurance that these will be given due weight in this consultation.**

Extending the scope of Part O

We welcome the introduction of new statutory guidance in the form of Approved Document O (Part O of the Building Regulations), which came into effect in June 2022 and covers the overheating mitigation requirements of new residential buildings. However, we believe this should be widened in scope to maximise its positive effects.

The December 2023 FHBS consultation asks a specific question regarding expanding Part O to apply to conversions of non-residential buildings to residential. We support this proposal.

At the UNFCCC COP28, held in the United Arab Emirates in December 2023, the UK was one of over 60 countries to sign up to the Global Cooling Pledge. This commits countries to a series of actions based on the findings of the Global Cooling Watch report produced by the UN Environment Programme-led Cool Coalition. Among these is a commitment to “establish national model building codes that incorporate market appropriate passive cooling measures and energy efficiency strategies by 2030 for *new and refurbished buildings* [our emphasis]”.

In our report we asked the Government to clarify whether it is intended that Part O of the Building Regulations be expanded to refurbishments, and if this is not the case, that Ministers explain how the UK is to achieve this particular commitment. The Government response to our report fails to address this point, saying only that Part O meets the commitment in relation to new builds and that the FHBS consultation seeks views on updating Part O.

We again request clarification as to how the Government intends to meet the Global Cooling Pledge commitment in respect of refurbished buildings. We support an extension to Part O to cover refurbishments as the most effective and straightforward method of achieving this.

Post-occupancy evaluation

We heard suggestions that there is currently little post-occupancy evaluation of new build homes, meaning the real-world effectiveness of meeting regulations ‘on paper’ is seldom ascertained. Your Department’s December 2023 FHBS consultation sought stakeholder views on the merits of asking all domestic developers to carry out post-occupancy performance testing on the houses they build and to make the results publicly available, but does not envisage making this a mandatory requirement.

We reiterate our recommendation that measures taken under Part O should be subject to post-occupancy evaluation within the first year of their installation.

Encouraging the use of fans (Part L)

We heard that electric fans can be very effective in reducing the need for energy intensive air conditioning units, but that there are currently barriers to the large-scale adoption of ceiling fans, such as the omission of locally controlled air movement in the comfort definition in Part L of the Building Regulations and a lack of design guidance.

We reiterate our recommendation that the Government evaluate the case for amending Part L of the Building Regulations to encourage the use of ceiling fans.

Consultation outcome

I should be grateful if you would please set out in your response: **(i) how many submissions were received by your Department in relation to the FHBS consultation which closed in March 2024; and (ii) when you expect to issue the Government’s response to the consultation.**

Green infrastructure

A second major theme of our report concerns green infrastructure such as parks, trees and green roofs. We heard that nature-based solutions to climate change such as these have significant cooling effects as well as multiple co-benefits (for example, for health, wellbeing, air quality, flood resilience and biodiversity). Increasing the amount of green space is one of the most important tools in tackling the impacts of heat—especially in urban areas, which are naturally hotter due to the urban heat island effect.

We applaud the introduction by the Government of statutory measures to mandate the delivery of biodiversity net gain in new developments, pursuant to the provisions of the Environment Act 2021. This provides a clear opportunity for your Department to work with planning authorities and developers to ensure the appropriate delivery of green infrastructure within urban developments.

The findings of the Environment, Food and Rural Affairs Committee’s recent inquiry into urban green spaces are very much in alignment with our own on this subject, and serve to reinforce the evidence base yet further.^{iv}

In light of this I am writing to highlight again the relevant recommendations from our report and request that the response to these be reconsidered and strengthened.

Statutory requirement to protect green space

The Environment, Food and Rural Affairs Committee found that the quality and quantity of urban green spaces were on the decline, continuing a trend that was evident as far back as 2017. As the Climate Change Committee points out in its March 2023 report on Progress in Adapting to Climate Change, **there is no clear legal requirement to protect and enhance public green space. We believe that the introduction of such a requirement would be a critical step in addressing their decline.**

While the Government response to our own report states that “the primary responsibility for urban planning in individual areas sits with local authorities”, it is clear that funding pressures are standing in the way of progress in this area. As the Chair of the Environment, Food and Rural Affairs Committee has concluded: “Increases to the revenue support grant and other one-off grants have not fundamentally addressed significant funding gaps for urban green spaces”.^v

Natural England Green Infrastructure Framework

We believe that Natural England’s Green Infrastructure Framework (GIF) is a significant and welcome step forward in setting out how green infrastructure can be best designed and implemented: yet its potential impact is severely limited by its status as guidance. We also heard that only a small number of local authorities had adopted the GIF so far. Given the elevated risk of heat in urban environments, **we would like to see a mandatory requirement for local authorities in urban areas to apply the Green Infrastructure Framework in the development and execution of planning policy.** We note that the Environment, Food and Rural Affairs Committee also recommends this as part of a suite of measures to elevate the status of green infrastructure.

Green roofs

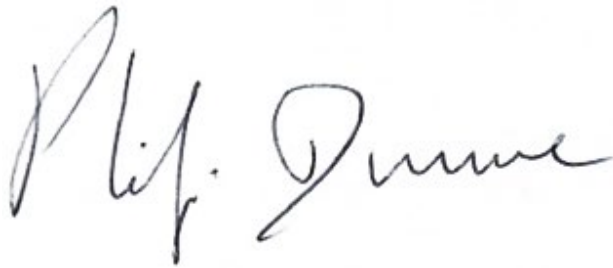
We agree with the Climate Change Committee that **Government policies ought to incentivise the introduction of green roofs**, and we urge the Government to review its position in this area so as to encourage the take-up of this important adaptation measure by individuals, businesses and communities in urban areas.^{vi}

I should be grateful to receive a response to this letter not later than **Wednesday 12 June**.

I expect the Committee will publish this letter together with the response, once received.

I have copied this letter to the Chairs of the Levelling Up, Housing and Communities Committee and the Environment, Food and Rural Affairs Committee.

Yours sincerely –

A handwritten signature in black ink, reading 'Philip Dunne'.

Rt Hon Philip Dunne MP

Chair of the Environmental Audit Committee

ⁱ The evidence received during the course of the inquiry is published on the Committee's website at <https://committees.parliament.uk/work/7811/heat-resilience-and-sustainable-cooling/publications/>

ⁱⁱ Environmental Audit Committee, [Heat resilience and sustainable cooling](#), Fifth Report of Session 2023–24, HC 279

ⁱⁱⁱ Department for Levelling Up, Housing and Communities, [The Future Homes and Buildings Standards: 2023 consultation](#), December 2023

^{iv} Letter from the Chair of the Environment, Food and Rural Affairs Committee, Rt Hon Sir Robert Goodwill MP, to the Secretary of State for Environment, Food and Rural Affairs, Rt Hon Steve Barclay MP, on the subject of that Committee's [Urban green spaces inquiry](#), 14 March 2024

^v *Ibid.*

^{vi} Climate Change Committee, [Progress in adapting to climate change: 2023 Report to Parliament](#), March 2023, p. 220