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## RIBA response for reducing red tape – a BIS inquiry

July 2010

### Summary

In order to tackle climate change, it is important that there is a clear and workable regulatory framework in place, but there are a number of areas where we would welcome clarity, simplification and in some areas, an acceleration of activity. In particular, which we would like to see the government prioritise:

- **Post-occupancy evaluation** - There is a real need to properly measure, post-occupation, how the actual carbon performance of buildings matches up to that forecast at the time of design. This is a huge problem and one the RIBA is seeking to address through our joint project with CIBSE called 'Carbon Buzz' (see [www.carbonbuzz.org](http://www.carbonbuzz.org)). Officials at DECC and BIS are fully briefed on this project, but there is a need for government to ensure that the issue is addressed.
- **Existing Buildings** - It is estimated that around 80-90% of buildings that will be used in 2050 already exist and it is essential that the government undertakes a thorough analysis of regulations and planning policies to ensure that retrofit and refurbishment is not discouraged. New build should not be the only option and changes may be needed in building regulations and the planning system to reflect this, as well as fiscal stimuli applied and appropriate guidance given to owners and occupiers of buildings.

### RIBA Recommendations:

- The Code for Sustainable Homes should form the basis of a Code for Sustainable Buildings, covering all building types, and which should focus primarily on energy and emissions.
- Government needs to urgently agree a workable definition of zero carbon, which we believe should be based on the hierarchical model outlined in the earlier Definition of Zero Carbon consultation, and should clearly define 'allowable solutions'.
- There needs to be a review of the numerous building performance standards, regulatory and non-regulatory, that cover various building types – wherever possible these should be aligned, common agreement found on the most appropriate standards, and wherever possible should be unified within building regulations.
- We believe that a national trajectory to zero carbon is required to underpin efforts by the construction industry and other sectors.
- Local planning policies should be developed to enable local authorities to set out their own roadmap to a low carbon local community:
  - mapping local heat, power, cooling and energy generating opportunities against current and future needs
  - setting local green infrastructure priorities
  - setting incentives and policies to encourage investment in appropriate development and refurbishment
  - developing local policies to integrate building refurbishment and adaptation programmes, and local public and private development, with the development of neighbourhood-level heat, energy and cooling networks
- Building regulations, planning and the use of non-regulatory standards need to be reviewed and aligned to ensure that buildings meet performance targets:

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- There are a number of standards, regulations and voluntary best practice that are applied right across construction and refurbishment, be they related to energy efficiency, space, access or health and safety. Often these standards are not well aligned and can be confusing or even conflicting. We believe there is a need to streamline and align standards, and unify them where appropriate.
  - There is a need to resolve the conflicts and newly created overlaps between planning requirements and building regulations. Certain technologies (ground source and air to air heat pumps, district heating, CHP) should be declassified as renewable. We propose that these non-renewable technologies are implemented to improve energy efficiency and reduce carbon emissions, and that they should be regulated, assessed and controlled by Building Regulations and not through the planning system.
  - Only 'on-site' solutions (energy produced via solar and wind energy through photovoltaics, solar thermal systems or wind turbines) should be classified as renewable. This would simplify the planning process.
  - Incorporate all building performance criteria into the improved building regulations, and do not use planning legislation and decision conditions to demonstrate compliance with building performance criteria
  - Enforcement and long-term measurement of performance of both new and existing buildings will be critical to cutting energy use and lowering carbon emissions. We believe the current mechanisms are wholly insufficient and unsatisfactory.
  - Local authorities and central government should create targeted incentives and increased awareness of relevant benchmarks, enabling building owners and users to improve the performance standards of new and existing buildings
  - We question whether the existing Part L framework is appropriate as we move forward to the 2013 revisions and beyond. We suggest it would be appropriate to explore other alternative routes, for example through a measure KWhr/m<sup>2</sup> or Heat Loss Parameters coupled with a Services Compliance Guide.