



THE INSTITUTE OF HISTORIC BUILDING CONSERVATION

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Dear Mr Mountain

Re: Building a Greener Future: towards zero carbon development

The IHBC welcomes the Government's initiatives in addressing global warming, and the proposed raising of standards for new developments. We also strongly support the need to tackle energy use in the existing stock, but we are concerned that potential measures developed through the Buildings Review may not have considered implications in terms of design quality and impacts on the Historic Environment. Joined-up Government is needed to ensure that measures to deal with different environmental issues are coordinated rather than counter-productive: why, therefore, is this consultation ending on the very day that the Government's Heritage Protection White Paper is published? In the spirit of promoting such linkages, we would also refer you to our comments submitted on the proposed revision of PPS 1 on Climate Change, also posted on our web site (www.ihbc.org.uk).

Q1 *Are we right about the need for new housing to lead the way in delivering low carbon and zero-carbon housing, and is it achievable in the timescale we have set out?*

Yes in terms of new housing leading the way, but the aims for zero carbon construction should not be restricted to housing. Proposals should encourage minimum carbon use in all types of construction, and should not be restricted to single use types. Mixed-use should be positively promoted.

We support the aspirations in terms of timescale, but achievability depends above all on changing the outlook of the mass housebuilders, through firm and enforced regulation. This is the only way in which change on the scale needed can be achieved. Without firm regulation, we will continue the depressing pattern of failing to turn ground-breaking examples of best practice into generality: e.g the exemplar buildings erected 25 years ago for Homeworld 81 at Milton Keynes which had no significant influence on housebuilding practice, and more recently the difficulties Bill Dunster has had in developing the highly-praised BedZed model into a market housing context.

Q2 *Have we got the assessment of costs and benefits right?*

We are concerned that no reference appears to be made to the potential costs arising from (a) either workforce skills development (for both new builds and upgrading existing) needed for the construction and building services industries, or (b) new monitoring and enforcement measures required from the regulators.

Q3 *Have we got the balance right between the contribution of the planning system and that of building regulations? Are there other policy instruments we should consider? Are there ways in which we can design our policy instruments to achieve the same goals more cost-effectively?*

Planning and Building Control need to be coordinated to deliver design quality (in terms of both performance and physical aspects) through from initial briefing to planning approval and then on the ground. This requires a development team approach with planners and building control, working closely together. Two current problems are (a) the lack of effective Building Control enforcement to ensure that claimed performance standards are actually delivered (to date, Part L has been aspirational but toothless); and (b) the use of Approved Inspectors (and Licensed Installers) remote from the planning authority, so precluding a development team approach.

Q4 *Are there significant solutions to climate change that our policy framework does not encourage and are there other things we should be doing to address this?*

The policy framework does not yet encourage:

- 1) the re-use of existing buildings in preference to new-build (to save embodied energy)
- 2) construction in a way that provides for future re-use of materials (e.g. use of lime mortar rather than cement, so allowing bricks to be re-used)
- 3) construction in ways which minimise energy use
- 4) best practice in retro-fitting of energy-saving measures (e.g. in minimising impacts on the Historic Environment: an updated and widely-publicised successor to English Heritage's *Interim Guidance on applying Part L to Historic Buildings* is long overdue; we also commend to you the *Guide to Building Services for Historic Buildings* published by CIBSE, the Carbon Trust, and Action Energy ISBN 1-903287-30-8).

Q5 *Are we right in our assessment of what we should seek to achieve through the planning system and through Building Regulations? Are there other policy instruments we should consider?*

These measures need to be coordinated with Government policies for Planning and the Historic Environment, to ensure that both new design and the upgrading of existing buildings achieve wider environmental aims while preserving and enhancing the special character of our country and its historic environment. Most particularly, the existing special consideration for Historic Buildings under the Building Regulations needs to be continued, enhanced, and linked to reviewed GPDO controls over permitted development in Conservation Areas. Such coordinated regulation needs to be supported and promoted through well-publicised advice on best practice for upgrading historic buildings.

Q6 *Are there areas of duplicative – or even conflicting – regulation in the framework that we have described? Do these threaten to get in the way of meeting the goals we have set?*

No response.

Q7 *Do you agree that all new homes should receive a rating against the standards set out in the Code for Sustainable Homes should be mandatory from April 2008?*

Yes.

Q8 *Do you believe that our timetable for delivering zero carbon development through more stringent Building Regulations is sensible and achievable, too stringent, or not stringent enough?*

We would recommend consideration of the related issues, identified above, through detailed research and investigation, before presuming that any timetable is appropriate.

Q9 *Do you think our assessment of the costs of achieving these targets is realistic? Can you offer additional supporting evidence on costs?*

See concerns noted under Q2.

Q10 *We believe that a zero carbon target is the most robust framework for reducing the carbon footprint of new development. Do you agree that our definition of zero carbon in paragraph 2.33 is the right approach? Where there are circumstances in which the additionality of offsetting measures outside the development can be demonstrated and are more cost-effective (e.g. on small infill developments), is there a case for carbon neutrality (i.e. taking account of offsetting measures)?*

Potentially, yes.

Q11 *Does the framework that we describe give adequate room to authorities and developers to make best use of the opportunities available at different spatial levels, for example district heating and district cooling?*

No answer.

Q12 *Do you agree that, for the reasons set out, there should be a national strategy for regulating the emissions from buildings supported by local promotion of renewable and low carbon energy supply?*

Yes, subject to local promotion of minimising energy demand.

Q13 *Are we right to assume that our twin goals – of delivering the new homes that are needed and reducing emissions from the housing stock – will be achieved more effectively by relying on national standards (i.e. Building Regulations and the Code) than through encouraging earlier action by individual local authorities?*

National standards will have the widest impact, but should not preclude earlier exemplary action by local authorities.

Q14. *Given that the proposed PPS on climate change will apply in England but not in Wales, are there any specific implications in Wales for the future direction of Building Regulations implied by this consultation?*

This should be the subject of a separate consultation.

END OF FORMAL SUBMISSION.

I trust these comments are helpful.

Yours faithfully

Dr Seán O'Reilly
Director, IHBC