

Conor Murphy MLA
Department of Finance
Clare House
303 Airport Road
Belfast, BT3 9ED

Dear Finance Minister,

We are writing to you regarding your department's current consultation on the proposed uplift to Part F of the Building Regulations. With almost 15% of all carbon equivalent emissions in Northern Ireland a result of energy used in our homes an update to these regulations is critical.

As a group of independent professionals working in the construction industry, we are concerned about how far these proposals go. We feel that they need to be significantly more onerous in the context of the climate and ecological emergency, and do not go far enough in supporting Northern Ireland to reduce its carbon emissions.

With rising energy costs many in our society are facing the choice between heating and eating, the Department of Finance has a responsibility to ensure buildings are insulated well enough so as to eliminate fuel poverty. The Department of Finance should be taking the opportunity to help families and businesses with rising energy costs by ensuring all new and refurbished buildings are very well insulated.

Our five main areas of concern with the proposed uplift are as follows.

- 1) **The uplift should not be based on percentage based improvements.** It should instead comprise a comprehensive and clear reworking of the regulations based on current data and calculation methodologies. The use of percentage increases over regulations that are unchanged in their detail since 2012, and based on out of date performance criteria, will result in buildings which do not provide the levels of thermal performance necessary.
- 2) **Existing buildings should not be forgotten in this uplift.** The omission of updates to limiting factors for existing buildings - including new extensions - means they can continue to be constructed to poor thermal standards. Furthermore the lack of requirement to upgrade any existing fabric when extending an existing dwelling continues to store up problems for the immediate future.
- 3) **Fabric performance requirements should be more onerous.** The proposals for fabric performance requirements are welcomed however they could be greatly improved, reducing the energy use of all new buildings designed to net zero.
- 4) **This consultation should also cover Part K (Ventilation) in tandem.** Elements covered in this consultation will impact on compliance with areas covered in other Technical Guidance Documents, such as Part K - Ventilation, and vice versa. These areas should be addressed in tandem to see meaningful progress on the efficiency of buildings.
- 5) **Embodied Carbon.** The carbon footprint of construction, known as embodied carbon, accounts for 11% of global emissions and can account for around 70% of a building's emissions in its lifetime. The new Part F should therefore also include Embodied Carbon. Otherwise the department should set out a clear and immediate time frame for introducing new Embodied Carbon Building regulations in line with [Part Z](#) proposals in England.

Whilst we welcome the consultation, the scale of destruction globally caused 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, and we urge you to reconsider the current proposals laid out for this uplift to Part F.

Yours Sincerely,

Architects Climate Action Network Northern Ireland