

EMAIL SUBJECT: URGENT – CONSULTATION DEADLINE 19th DECEMBER 2021

[INCLUDE YOUR ADDRESS IF WRITING TO YOUR MP]

Dear Sir or Madam, [insert name MP/MLA if known]

I [am a member of / support] Architects Climate Action Network Northern Ireland (ACAN NI), a group of architects and associated professionals working to address the Climate and Ecological Emergency. I am writing to you for your assistance in pushing for stronger building regulations in order to address the Climate Crisis and fuel poverty in Northern Ireland.

The Northern Ireland Department of Finance is currently consulting on Part F of the Building Regulations (closing 19th December 2021). Part F deals with energy use in buildings. The proposed regulations fail to address the Climate Emergency and represent inadequate progress from the current, already inadequate, regulations.

The Issue - Fuel Poverty and Climate Change

With rising fuel prices putting more people at risk of fuel poverty we must adopt a fabric-first approach of well-insulated buildings in order to radically reduce and eliminate the need to heat buildings. The Finance Department's proposals to alter Part F do not go nearly far enough to reduce energy use and limit our national emissions at the rate necessary to stem climate change.

In Northern Ireland nearly 15% of all carbon emissions are a result of energy used in our homes, and homes are one of the largest single sources of emissions in the UK. Without changing the way we construct and renovate buildings we will fail to reduce emissions enough to mitigate catastrophic impacts of climate change on local and global communities as well as our national finances.

The Regulations

The Building Regulations set standards for how buildings are constructed in Northern Ireland. Part F relates to Conservation of Fuel and Power and determines how buildings use energy. This consultation is important because it affects how buildings will use energy in the coming years. The key issues with the proposals are:

- 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. Using percentage increases over regulations that are unchanged in their detail since 2012, and based on out of date performance criteria, will undoubtedly result in buildings which do not provide the levels of thermal performance standards necessary today so will require upgrades in the immediate future.
- 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 operational 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 made on the operational 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.

The Department for finance have said their current proposals are an incremental step in improving the Building Regulations over time, yet it has taken nearly a decade for this meaningful update to come about. This rate of incremental change is inadequate in a climate emergency and a fuel crisis. *This* update to Part F must make significant steps to produce much better insulated buildings, which in its current form it fails to do.

Your Support

I hope you agree that the new Part F must be much stronger to ensure energy efficiency in buildings. I would be grateful if you would help to challenge the proposals to change Part F in its current form in the following ways:

1. Please write to the NI Finance Minister requesting that his department review the draft regulations so that Northern Ireland can mitigate catastrophic climate change and eliminate fuel poverty.
2. Please use your voice in the NI Assembly in debates, parliamentary questions etc to highlight this issue.

ACAN Northern Ireland has prepared its own response to this consultation, which can be accessed at <https://www.architectscan.org/ni-part-f> where you can sign our open letter to the Finance Minister and use our responses to help form your own consultation response.

ACAN NI

This year ACAN NI addressed the Northern Ireland All Party Group on Climate Change and met with the Finance Minister to discuss the regulation of embodied carbon within the Building Regulations. ACAN NI encourage others in the assembly to support the urgent adoption of Embodied Carbon regulation akin to [Part Z](#).

In 2022, ACAN Northern Ireland will continue to take action to address the twin crises of climate and ecological breakdown, please do not hesitate to contact ACAN NI if you wish to support this cause or have any questions.

Thank you for your time and support.

Yours,

[YOUR NAME]

[Architect (if applicable)]

ACAN NI contact: northernireland@architectscan.org

ACAN NI instagram: [@architectscan_ni](https://www.instagram.com/architectscan_ni)

Further Information

The official consultation page for responses can be found at:

<https://www.finance-ni.gov.uk/consultations/consultation-proposals-amendment-technical-booklet-guidance-part-f-conservation-fuel-and-power>