

Andrew Stunnell OBE MP
Parliamentary Under Secretary of State
Communities and Local Government

31st August 2010

Dear Minister

We are writing to you as a group of leading sustainable building experts (under the name of the St Pancras Group) in response to your call for suggestions for changes to Building Regulations. We welcome this opportunity to comment and are grateful for the fresh approach which you are taking. We feel strongly that it is time for a review of the nature of Building Regulations and how they relate to both the construction industry and the environmental challenges which we face in the 21st century.

Our main concern is that at present legislation such as Building Regulations is not having a significant impact on the actual performance of buildings in terms of their energy use, carbon emissions and overall environmental impact. There is a considerable and growing gap between the aspirations of legislation and the reality of buildings. This is getting worse as legislation becomes ever more ambitious and there is the added risk of many unintended consequences for health, cost and environmental impact. It is for this reason that we believe an entirely new approach is necessary.

It should also be said, of course, that Building Regulations exist alongside other building related legislation, such as the Code for Sustainable Homes and the Zero Carbon Homes policy. These have a considerable impact on Building Regulations and also, of course, on construction and building use. Many of us who are writing to you now have been involved with these regulations for many years, giving up a lot of time freely to advise Government, and have become acutely aware of the complexity of this situation. As a result many of us have been considering the nature of regulation in regards to building for some while, and the resulting short proposal should be understood as part of a much deeper and longer consideration of the issues. It should also be said that this proposal is supported in principle by many people and organisations beyond this group, with whom it has been discussed.

This letter is a plea for Government to listen to those who know about sustainable buildings. At present we are not going forward in this area, but are rather going backwards in terms of environmental impact while at the same time creating huge risks and liabilities. However there is a much better, simpler and cheaper way of legislating for sustainable building in the UK. It is this which we propose and which we hope you will have time to consider. We have made a brief analysis and proposal in the document accompanying this letter. This is not a long or detailed document, but what we hope is the basis for a more detailed discussion.

We would welcome the opportunity to meet with you to explain our position more fully at any time. We will also be writing to Grant Shapps, Bob Neill and Baroness Hanham on the same basis.

Yours sincerely,

Jon Bootland (on behalf of the Sustainable Development Foundation)

Alan Clarke CEng MSc MEI

Chris Herring (as Chair of AECB)

Professor Adrian Leaman

Neil May (as Chair of the Good Homes Alliance)

David Olivier BSc, MInstE, MASHRAE

Professor David Strong (as CEO of Inbuilt)

Peter Warm CEng BSc MInstE

This letter and proposal has been put together in discussion with

Professor Malcolm Bell (of Leeds Metropolitan University)

Professor Robert Lowe (of UCL Energy Institute)

Professor Tadj Oreszczyn (of UCL Energy Institute)

For further information or discussion please contact

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