

St Pancras Group proposal: *An alternative approach for Sustainable Buildings*

The advent of a new Government provides a real opportunity to make significant and highly beneficial changes to policy, legislation and funding in regard to sustainable buildings. In the opinion of this group of experts there is a need for a much simpler and better framework of legislation (and funding), which will be much cheaper to Government and industry and much more beneficial to the environment and to building occupants and users.

The main reason as to why we need a new approach is that there is a huge gap between the **aspirations** of legislation and the **reality** of building performance. Please see the recently published Zero Carbon Hub Report Carbon Compliance for Tomorrow's New Homes –Topic Group 4 report Closing the Gap Between Designed and Built Performance (http://www.zerocarbonhub.org/resourcefiles/TOPIC4_PINK_5August.pdf) for recent evidence of this deep seated problem. This gap is increasing as legislation gets more demanding and more complex. Furthermore the disparity between legislation and reality is not only creating huge costs to occupiers and the nation, but is also resulting in significant unintended consequences which are likely to have further negative impacts on performance, health and the environment.

In contradiction to the thinking and policy of the previous Government, this group believes that the best way to achieve both long term sustainability in the built environment and real short term reductions in buildings environmental impact is to focus on basics, and to learn to walk before we try to run. We need to take into consideration the very poor nature of building performance in the UK, the low levels of knowledge and ability, and the long timescales required to introduce new concepts and learning into the industry, before we attempt unproven and world beating standards. In a word, we need a properly planned and co-ordinated policy that integrates the reality of construction and building use with legislation and research. In this way we will build a firm and durable foundation for a sustainable future.

In our opinion a properly integrated approach requires simplified standards (with a focus on reduction of energy use), the proper monitoring of building performance, and training and education throughout the supply chain and including users. Policies which complicate this process should be dropped. If we do not simplify processes, then the consequence of pursuing multiple, complex and often conflicting aims will be to continue to produce more badly performing and expensive buildings, with huge and unnecessary costs in both Government and Industry.

This group suggests the following radical changes to policy:

1. Improve performance now by clearer, simpler, better legislation

- Reduce complexity by making Building Regulations the sole regulatory tool for buildings performance.
- Prioritise energy reduction: Introduce a simple but stretching energy based metric for building energy performance, such as AECB Silver Standard or FEES (Fabric Energy Efficiency Standard). Any such standard should use clear and absolute energy terms such as kWh/m²/yr.
- Eliminate conflicting legislation such as the Code for Sustainable Homes and the Zero Carbon Homes Policy.
- Replace codes and standards for higher levels of performance with a simple framework of fiscally neutral tax incentives.
- All other sustainability requirements should be brought into Building Regulations or, if not possible, into Planning (ie ecological impact of development which is already part of Planning)
- Ensure real penalties for non-compliance. This is easier because legislation is simpler and clearer.

2. Ensure we learn from what we do:

- Introduce mandatory monitoring and smart metering of building fabric performance within 2 years, with a simple methodology, and a central data base recording real performance.
- Develop proper and better tools for monitoring and compliance through pilot schemes and R & D
- Have no major changes to Building Regulations for at least 6 years, which allows for the necessary 6 year cycle of planning, building, monitoring and learning. This also gives industry confidence to embrace the regulations and to invest in the skills to deliver to them.

3. Look to the future:

- Incentivise excellence through fiscally neutral tax incentives, Planning gains and other means. Insist on real and full building monitored data from all grant funded processes.
- Ensure that feedback from monitoring, exemplar projects and research is integrated into training and education of all parts of the supply chain and also building users.
- Create an independent publicly owned expert knowledge centre for the collation of data and research, and for the direction of funding for training in the sector.

These principles are proposed by this group as the best way to tackle the performance gap given the current state of the industry (and country) in terms of knowledge and ability. This is also an approach which puts responsibility and knowledge into the hands of those who build buildings as well as those who use them. It is an approach which is practical, low risk and low cost. It will deliver a real improvement in our buildings performance, while lowering environmental impact and ensuring long term gains for industry, building users and the country as a whole.

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