

***Consultation on the  
Building Regulations (NI) 2000 New  
Requirements relating to  
Plans of No Effect and  
Minor amendments/clarification  
to Parts A, E, F and L***

***Comments by***

**Northern Ireland Environment Link**

**4 June 2010**

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the environment of Northern Ireland. Its 58 Full Members represent over 90,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are agreed by Members, but some members may be providing independent comments as well. If you would like to discuss these comments further we would be delighted to do so.

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## **Introduction**

We welcome the consultation process and commend the effort to involve stakeholders in the proactive development of policy work to ensure the many benefits that involvement of and input from stakeholders can achieve. The process takes time, but when done in a true spirit of collaboration saves time in the long-term by identifying and addressing concerns of citizens, non-governmental organisations and other government departments and agencies at an early stage.

Northern Ireland Environment Link publishes its Policy Priorities annually in our document titled *The Way Ahead*. This consultation relates to all four of the main themes within that report; climate change, sustainable development, environmental protection and planning. We welcome the proposals contained within the proposals. Building regulations offer huge opportunities for Northern Ireland to help address major issues of climate change, fuel poverty, energy security and energy costs, and proactive and strong regulations will ensure that Northern Ireland can become a leading low carbon economy.

### **Plans of No Effect (Q1 and 2)**

We welcome the proposed change so that if development has not commenced after three years the plans are essentially voided. The technology and social demands are changing so rapidly that it is necessary that such old plans are not put into effect without substantial updating to reach new standards.

### **Removal of provision of Target Emissions Rates for material change of use (Q3)**

We strongly object to this and feel that such a removal of these requirements for reporting are fundamentally opposed to efforts to drive increased energy efficiency and reduce carbon emissions. There is mention that there are alternative arrangements for reporting but without detail on what these are we must strongly object to removing this requirement to report on carbon efficiency.

### **Fire Safety (Q 4 and 5)**

No comment.

### **Efficiency of Heating Appliances (Q6 – 11)**

We support these clarifications in that they increase the clarity around the demand for greater efficiency, but still feel that these proposed standards could, and should, be more demanding given the ever increasing cost of fuel, the carbon costs of heating and the long lifespan of heating appliances. Setting higher standards will drive the market for efficient appliances and ensure long term (lifetime) financial and carbon costs are decreased for the residents.

### **Provision of Energy Performance Certificate (Q12)**

This appears to merely remove a duplicated requirement from the regulation and that EPCs will still be submitted to both the owner and Council; on the understanding that both will still get EPCs we are content with this change. EPCs are a vital and visible way to promote energy efficiency as a major factor when buying a property and must be promoted strongly as such.

### **Technical corrections to references (Q13)**

Supported.

