



RSUA

The Royal Society
of Ulster Architects

Dr Steve Aiken MLA
Chair, Committee for Finance
Room 373, Parliament Buildings,
Ballymiscaw, Stormont,
Belfast, BT4 3XX

1 March 2022

Amendment of Technical Booklet Guidance to Part F (Conservation of fuel and power)

Dear Steve

I write to seek the Committee's support for the speedy implementation of the changes to Technical Guidance to Part F, in particular the preferred option set out in the consultation by the Department of Finance with the support of the NI Executive.

The Royal Society of Ulster Architects (RSUA) encourages the Committee not to act as a brake on the implementation of this new guidance but instead to seek to ensure that appropriate measures are in place to support the wider construction industry through the implementation phase.

No time for delay

It is important to re-emphasise that there are no new regulations under consideration at this time. When the regulations were updated in 2014 the Department of Finance gave an [undertaking](#) that the supporting technical guidance was to be consulted upon and approved in advance of 2019, when the regulations for Nearly Zero Energy Buildings (NZEB) would come into operation.

The NZEB regulations came into operation in 2019 but there was technical guidance produced. It is already more than 3 years late. No further delay should be countenanced.

Delivery

RSUA calls on the Committee to endorse the preferred option set out in the consultation which would require NZEB buildings to better the current Target Emissions Rate (TER) outputs by 40% in the case of new houses.

This uplift is achievable today. Indeed at the launch of the consultation the Finance Minister visited a house built in 2013 which would meet these new standards. Numerous architects and builders are already working to these higher standards to deliver housing which is cheaper to run. The higher standards are normal in the Republic of Ireland and this change has been signalled for a long time in Northern Ireland. It is our clear view that the local market is ready for this change.

Need for action

Emissions from home heating in Northern Ireland are practically the same now as they were 20 years ago. RSUA believes the proposed changes are the absolute minimum step that could be taken at this stage. Further significant advances will be required over the coming years to address the climate challenge. The current spiralling cost of home heating just goes to highlight the importance of building homes now that have a low heating demand.

Support

RSUA wants to ensure that the speedy implementation of this new guidance does not slow down the supply of new homes. Therefore we seek the Committee's support for measures to be put in place to assist the wider construction industry during the implementation phase, for example:

- A protocol to fast track changes to planning permissions to enable buildings to meet the new technical guidance.
- Sufficient financial support for housing associations to meet the costs of any redesigning required or additional capital costs associated with meeting the new technical guidance in the short term
- Government support for upskilling across the sector

I am conscious that extensive deliberations at the Committee will only serve to slow the process down and therefore I am not seeking to meet with the Committee. However, if you believe this is necessary, I could accommodate this at very short notice.

Yours sincerely

Ciarán

CIARÁN FOX
Director