

CIOB response to the Public Consultation on the Review of Building Regulations Part L (Conservation of Fuel and Energy) and European Union (Energy Performance of Buildings) Regulations

Introduction

The Chartered Institute of Building (CIOB) is the world's largest professional body for construction management and leadership. Our 45,000, members, including over 2,500 in Ireland, work globally in the development, conservation and improvement of the built environment and to promote the science and practice of construction for the benefit of society.

Having had an enthusiastic membership base in Ireland since the 1960s, we are growing our Irish team to increase the reach and impact of our work, and to support members and the wider construction community in Ireland. Our response to this, and other similar consultations, signals our intention to be a more influential voice when it comes to policy issues impacting the built environment in Ireland, and to provide education opportunities for those working in the industry. We would be happy to continue discussions on foot of this response.

CIOB Response

Part L

Buildings and dwellings in Ireland are improving. Building regulations over the last decade have improved quality, with many new structures achieving NZEB status, and airtight building envelopes. However, with some of these improvements, particularly airtightness, the importance of ventilation is often overlooked.

Poor ventilation can have serious consequences for buildings and for people: It can lead to condensation and mould damaging walls and fabric, and poor health for occupants. High humidity levels can affect allergies and complicate respiratory diseases brought on by certain biological agents such as mites and mildew.

In many dwellings and buildings that are compliant in terms of insulation and airtightness, the required air flow rates through passive venting are sometimes not met. Therefore, while we welcome the introduction of self-regulating devices, (Demand Control Ventilation, and Heat Recovery Ventilation, for example) the regulations must allow that it is still possible to ventilate a dwelling by natural means such as open vents in walls, and windows, thus ensuring the ability to adequately ventilate regardless of the status of any mechanical ventilation system in a building.

Otherwise, in buildings that use mechanical ventilation, when the system is switched off, the air will be of poor quality, and occupants will suffer associated health problems. This is of particular concern in local authority housing, where residents do not always have control of heating and air conditioning.

Whatever the outcome of this consultation, we must ensure that buildings continue to meet standards when it comes to achieving desired flow rates.

Electric Charging

Where car parking spaces are necessary – bearing in mind that current planning legislation disbars their use in central urban locations – the CIOB is happy with the proposed changes to Part L, and the provision of electric charging infrastructure in new and existing buildings.

However, this new infrastructure should not lead to *additional* car parking spaces, given the national policy priority for dense, public transport led development:

In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances¹

This guidance should not be overlooked when it comes to electric vehicles. Aspects of previous apartment planning guidance have been amended and new areas addressed in order to remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduce costs, and this should be maintained. This is a public realm issues and, as the guidance states, car parking 'should not be compromise the quality of amenity space, building design or streetscape'.² This position should be maintained regardless of whether a parking space is for an electric or petrol-powered vehicle.

Nevertheless, the National Climate Action Plan makes electric vehicles a priority. In the interest of maintaining interdepartmental policy coherence, it therefore makes sense - in buildings and dwellings that require car parking - for there to be a enough Electric Vehicle charging points adjacent to the building, and preferably charged by a renewable system.

¹ Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities. Department of Housing, Planning and Local Government.

² *ibid*