

Building regulations - energy standards and associated topics - proposed changes: consultation

18/11/2021

Built Environment Forum Scotland (BEFS) is an umbrella body for organisations working in the built environment in Scotland. Drawing on extensive expertise in a membership-led forum, BEFS informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's historic and contemporary built environment. BEFS is a supporting member of the [Climate Heritage Network](#).

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This consultation on the proposed changes to building regulations - energy standards and associated topics is welcome.

Other relevant consultation responses from BEFS can be seen below, as many issues overlap and demand associative consideration:

[Draft Heat in Buildings Strategy, Achieving Net Zero Emissions in Scotland's Buildings Consultation](#)

[Housing to 2040](#)

[Domestic Energy Performance Certificates \(EPC\) Reform Consultation](#)

BEFS will be responding only to relevant questions and sections of **Part 3** of the consultation document – **Energy, All Buildings:**

Question 20 – Do you agree with the proposed introduction of the term 'major renovation' as defined below as an additional means of identifying when aspects of building regulations shall be applied to an existing building?

'We propose that the term 'major renovation' become a defined term within Building Regulations, adopting the same definition as elsewhere in the UK to support simplicity of understanding and consistency in application. As follows:

'major renovation' means the renovation of a building where more than 25 % of the surface of the building envelope undergoes renovation.'

Yes

BEFS recognises the benefits of the standardisation of terminology towards a common approach and is supportive of removing barriers to energy efficiency measures through economising spend.

In particular, the document notes at 3.2.1 *'The premise of such a trigger is that the undertaking of significant construction work provide the opportunity to make other beneficial changes to the building at a lower cost than would be encountered if such works were done separately. Making such improvements more economically viable.'*

However, any works to the surface of the existing building envelope should be sensitive and appropriate, and the proposed introduction of the term should be read within the existing planning process and statutory requirements for listed building consent where relevant.

BEFS also notes and supports the statement in Annex 6.D.4 on the importance of assessment: *'Recognising the complexity of the existing building and its systems, assessment should be carried out by persons with the necessary expertise to identify and assess cost-effective and energy efficient improvement.'* We would

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further add to this that BEFS considers this necessary expertise should include identifying suitable materials and installation skills appropriate for works to and adaptation of traditionally constructed buildings.

Question 21 – Do you support the improvement in maximum U-values for elements of building fabric for Domestic buildings, as set out above?

Yes

However BEFS notes the importance of appropriate renovations and a nuanced approach to traditionally constructed buildings and recognises this approach as outlined in the Guidance to Standard 6.2: 6.2.7 Conversion of historic, listed or traditional buildings [Building Standards Domestic Technical Handbook \(extract\), Consultation proposals – Section 6 ‘Energy’](#). We would also highlight that to deliver the above the relevant skills, appropriate materials and supply chains for materials must be in place; recognising a skills shortage, Skills Investment Plans for [Construction](#) and for Scotland’s [Historic Environment Sector](#) provide points for expanding the skills sector across the built environment.

Question 22 – Do you support the improvement in maximum U-values for elements of building fabric for Non-Domestic buildings, as set out above?

Yes

As above.

Question 23 – Do you support the standardisation of values and approach for conversions, extensions and shell buildings, as set out above and in sections 3.2.2 and 3.2.3?

Yes.

Whilst BEFS is broadly supportive of standardisation of values intended to optimise improvement as set out in the draft Heat in Buildings Strategy, we would refer to comments made in response to the previous questions, and advocate for the approach as outlined in the Guidance to Standard 6.2: 6.2.7 Conversion of historic, listed or traditional buildings [Building Standards Domestic Technical Handbook \(extract\), Consultation proposals – Section 6 ‘Energy’](#). We would reiterate that conversions and extensions to existing and traditionally constructed or historic buildings should also be assessed with the necessary expertise and any work following assessment should include identifying suitable materials and installation skills appropriate for works to and adaptation of traditionally constructed buildings.

BEFS also considers the possibility of unintended consequences of standardisation, in that building type may need to be considered in order that older buildings are not made less comfortable to live in.

Question 25 – Do you support the continued alignment of minimum provisions for fixed building services at a UK level within the Domestic Building Services Compliance Guide?

Yes

As above - BEFS recognises the benefits but would raise potential for unintended consequences of standardisation, in that building type may need to be considered in order that older buildings are not made less comfortable to live in.

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Question 26 – Do you support the continued alignment of minimum provisions for fixed building services at a UK level within the Non-domestic Building Services Compliance Guide?

Yes

As above.

Question 28 – Do you agree with the proposal to limit distribution temperatures in wet central heating systems to support effective implementation of low and zero carbon heat solutions and optimise the efficiency of heat generation and use?

Yes

BEFS is broadly supportive but would caution that consideration should be given to how traditionally constructed buildings function; building type and other measures of optimising heat generation and use may need to be considered to avoid traditionally constructed buildings becoming (avoidably) less comfortable to live in.

Question 29 – Do you agree with the proposed extension to the provision of self-regulating devices to include when replacing a heat generator?

Yes

BEFS understands that this extension to the provision of self-regulating devices allows for zoned and controlled heating to a room/series of rooms. We support this as an efficient proposal and would reiterate the importance that assessment of older and traditional buildings be undertaken with an understanding of any challenges (or energy saving opportunities) presented by their layout or design.

BEFS responses to a number of Consultations in relation to the Built Environment can be found at:

<https://www.befs.org.uk/resources/consultations/>

RESPONDENT INFORMATION

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Responding on behalf of an Organisation - **BEFS** (Built Environment Forum Scotland)

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The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference: **Publish response with name**

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to

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do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise? **YES**

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy. **I CONSENT**