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## **CIH Northern Ireland consultation response to the review of energy efficiency requirements and related areas of Building Regulations**

### **General comments**

CIH welcomes the consultation on the review of energy efficiency requirements and related areas of Building Regulations. We have written our response following consultation with CIH members in Northern Ireland.

We support commitment from the department to enhance energy efficiency. Any delay could intensify the negative impacts of cold, damp homes. Those in the least efficient homes live in the deepest fuel poverty of any tenure, and [calculations by Citizens Advice](#) show that failing to raise energy efficiency standards has collectively cost renters £2.3 billion since January 2021.

The lack of progress continues to hold back achieving the net zero agenda, and to reach the net zero target by 2050, the government's Climate Change Committee advises that all rented homes need to achieve a good level of energy efficiency by 2028. In 2022, over 2.5 million private rented homes did not meet this standard.

Residents in the private rented sector often live in the most inefficient properties and suffer the daily consequences of not being able to keep warm and safe at home. The sector has the highest prevalence of damp of any tenure, and the evidence is clear that poor energy efficiency is often to blame.

### **Summary of question responses**

CIH and our members believe the pace of change to building regulations need to keep up with the net zero journey (note that last year's changes were the first in around 10 years). It is important that changes are timely and implemented correctly, reducing the risk that developers can make a submission on older regulations and deliver to those irrespective of what the new requirements may be.

The maximum time permissible for previously approved applications to commence on site after the introduction of the new standards should be three years. For example, housing associations currently work on an annualised development funding regime but if they move to multi-year budgeting, a three-year grace period would help to facilitate the change.

Our members believe the department should be mindful of other local factors as these consultation responses are collated. This includes the DEARA climate change consultations and climate budgets. Fundamentally, building regulations must facilitate the journey to meet net zero emissions in Northern Ireland.

Furthermore, to support progress on energy efficiency measures in our homes, there are interconnected areas where work needs to progress:

- Further investment in energy efficiency funding schemes like the Social Housing Decarbonisation Fund, with appropriate timescales for submitting bids and completing works
- Support to tackle the skills gap and develop more trained retrofitters across the country
- A clear commitment to net zero targets from the government, including the introduction of minimum energy efficiency standards for rented housing coupled with appropriate funding and fiscal frameworks for landlords.

### **About CIH**

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple - to provide housing professionals and their organisations with the advice, support, and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world. Further information is available at: [www.cih.org](http://www.cih.org).

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November 2023