

## **Irish Green Building Council Submission**

### **DRAFT 'Bringing Back Homes Manual for the reuse of existing buildings'**

#### **July 2018**

The following document is the Irish Green Building Council's (IGBC) response to the Department of Housing, Planning, Community and Local Government on the draft manual for the reuse of existing buildings. We also attach our comments in the required excel format. Our comments focus on some of the issues of greater strategic concern to our members rather than detailed editorials. We attended the workshop in the Department of Housing on 2<sup>nd</sup> of August. However the timing of the consultation does not allow for extensive consultation with members.

The IGBC was launched in 2011 and is comprised of organisations and businesses from the entire value chain of the built environment on both the demand and supply sides. These include educational institutions, professional institutes, NGOs, local authorities, contractors, architects, engineers, energy companies, property investors/developers as well as leading national and transnational companies. A full list of IGBC members is [available here](#).

The Objectives of the Council are to:

- Provide a source of leadership for sustainability and quality in the built environment
- Promote and assist in the provision of credible metrics for measuring progress towards the end goal of sustainability
- Provide a source of resources to organisations transitioning their activities towards more sustainable practices
- Be central to alignment of the policies of organisations seeking to achieve sustainability in the built environment

In 2016, the IGBC built a community of close to 200 key stakeholders to co-design an ambitious National Renovation Strategy (NRS) for Ireland. This work completed as part of [Build Upon \(H2020 project\)](#) led to the publication of a [comprehensive set of recommendations for a better NRS](#). Since the completion of this project, IGBC has further engaged with key stakeholders to implement some of these recommendations. As part [EeMAP](#) (H2020), IGBC is working to develop the principles of an energy efficient mortgages for Europe. It has also worked on better incentivising building professionals to upskill in renovation as part of the SEAI funded [ECCoPro project](#). Through the years, our members have repeatedly highlighted the need for better Integration of urban regeneration and retrofit policies – [see the open letter recently sent to Ministers Donohoe, Naughten and Murphy](#).

After extensive research and consultation with the industry, the IGBC has developed the [Home Performance Index](#) label to encourage quality and excellence in residential developments. Although focusing on new homes, many of the same The Home Performance Index includes 28 indicators that directly or indirectly impact planning, quality of life and our environment.

At international level, IGBC is an established member of the [World Green Building Council](#) and is [Renovate Europe national supporting partner in Ireland](#).

In this submission, the Irish Green Building Council offers general comments on various key areas within its remit of providing leadership in the transition to a sustainable built environment.

1. The IGBC welcomes the publication of the "Bringing Back Homes - Manual for the reuse of existing buildings". This is an excellent and useful document with clear illustrations and guidance. For some years, the IGBC and [its members](#) have supported a better use of available sites within the core centres, and an increase in the occupancy of underutilised buildings.

The dispersed and fragmented character of housing in Ireland has too often had a negative impact on our environment and on people's quality of life. It has also made it costly and often unfeasible for the state to align and invest in infrastructure delivery.

2. The IGBC is delighted to see the Department acknowledging the negative impact of these vacant properties on whole neighbourhoods, people's quality of life and our economy, including tourism.

3. In particular, the IGBC welcomes the inclusion of comprehensive guidance and high-quality case studies in the manual. Stakeholders involved in Build Upon ([Recommendation 5.2](#)) and [ECCoPro](#) projects have highlighted the importance of publishing more case studies and guidance. It provides excellent clarity on the application of planning and regulations to different scenarios but advises that this

4. IGBC does not believe that the publication of this manual on its own will be sufficient to significantly increase the number of viable residential projects. Some of the other issues for consideration are listed below.

- The IGBC is delighted to see that a pilot survey will be undertaken in some Local Authority areas to assess the numbers of homes available for reuse. Quality data is critical to tackle this issue - [See Build Upon recommendation 8.3](#). However, comprehensive data on the scale of the problem isn't sufficient. We need to gain an excellent understanding on why these properties are vacant or underutilised. The pilot studies should be carried out to elicit accurate data on this issue too as it was recently done in the UK by the Building Research Establishment (BRE).
- The IGBC welcomes the acknowledgement that the regulatory systems regarding planning, fire safety, accessibility, building control and conservation cannot be dealt with in isolation from each other if we are to support the renovation of these buildings. The IGBC calls for the development of common templates for evaluating renovation projects using a triple bottom line approach, i.e. quantifying environmental, social and economic impacts. Such templates could be used by social housing providers for making the business case for renovation as part of funding applications, but also by investors willing to weigh the opportunity of renovating multi-unit buildings - [Build Upon Recommendation 5.4](#). This document could for instance be developed by the working group set up to implement action 5.21 of Rebuilding Ireland or by the Vacant Homes Unit.
- As a one-size-fits-all approach does not work with renovation projects, the IGBC asks the Department to fully support the [recommendations made as part of the ECCoPro project in relation to upskilling building professionals in renovation](#). Lack

of skills could lead to a lack of coherent advice, poor quality work and ultimately to a general loss of confidence in renovation as cases of building and health problems from inappropriate upgrading works emerge. As of April 2018, Ireland's main construction professional bodies, including the Association of Consulting Engineers of Ireland, Engineers Ireland, IPAV, the RIAI and the SCSI have committed to move this work to the next stage if there is clear support from government.

- It is risky to assume that the complexity of renovation and regulations can be resolved by simple guidance without the involvement of highly skilled professionals. The guidance should recommend the involvement of professionals to achieve quality outcomes.
- Figure A1 in Appendix A1 illustrates the above point. The example given illustrates how opportunities will be missed by not using a high quality renovation professional, including the opportunity of creating a unique and light filled home from an existing shop, by maximising what is already there. Colour by numbers solutions like this, risk isolating renovation from good quality design, ending up with unimaginative lowest common denominator solutions with less than optimal levels of natural light, that erases local history, cultural value and dumbs down the street. What happens with the less visible issues such as the quality and implementation of energy efficient renovation, use of appropriate materials to the structure, and correct application and interpretation of regulations during renovation? This is why we need to encourage a strategy of using high quality professionals skilled not only to decarbonise our building stock but also capable of adding value to our buildings, streets and communities at the same time.



- The aggregation of projects can lower costs, improve quality and facilitate access to public and private funding. Furthermore, under the Energy Performance of Buildings Directive (EPBD) 2018 recast, member states should encourage the aggregation of projects. We believe that the final document should include guidance and case studies to facilitate aggregation of projects.
- For historic protected and unprotected buildings, technical guidance documents should be developed to ensure appropriate methods and materials are used. E.g. materials used in energy efficient renovations of historic buildings must be hygrothermally appropriate, as identified in the SEAI-funded study "[Deep Energy Renovation of Traditional Buildings: Addressing Knowledge Gaps and Skills Training in Ireland](#)". Conservation guidelines to minimise the impact of modern renovation systems on the cultural significance of historic buildings should be introduced. The guidelines should not be prescriptive or technically specific, but they should clearly identify the main issues and consider relevant conservation principles. International guidance models already exist and ICOMOS Ireland could perhaps support the government with the development of these guidelines. The Manual should also support the development of specialised training to upskill

building professionals in the energy efficient retrofit of historic vacant and underutilised buildings.

5. Bringing under-utilised stock into use is essential. The document should not just focus exclusively on town and city centres' main streets. The suburbs of our major towns and cities also need densification and consolidation if they are not to suffer from depopulation brought about by smaller household size. Reduction in population density in these areas makes the provision of vital infrastructure such as schools, and public transport even more challenging, and leads to loneliness and isolation of the elderly.

The option to vertically/horizontally extend semi-detached or terraced housing, subdivide them vertically/horizontally could be explored. The additional unit could pay for the entire cost of the development. We suggest developing guidance and case studies for the most common building types found in the suburbs as is done in this document for town and city centres' main streets. There is currently an overly conservative planning approach to our sprawling suburbs which have little cultural or aesthetic value but which often have greater potential to increase housing density.

6. We do not understand why the document does not give more importance to climate change nor acknowledge Ireland's obligations under the COP 21 Paris Agreement, the requirements under article 4 of the Energy Efficiency Directive for a national renovation strategy (now included under the EPBD recast in 2018.) Nor does it substantially mention Ireland's implementation of the Energy Performance of Buildings Directive recast 2010 and its requirement for near Zero Energy Buildings (nZEB) post 2020, implemented through the draft Building regulations Part L -dwellings (except in the appendices) We must avoid short term siloed solutions, instead fully integrating tackling our housing crisis with tackling climate change. This needs to be evident on every page of this document. There is little point in having separate documents to tackle different issues and one high quality document should serve the dual purpose of encouraging deep energy retrofit, tackling climate change and bring homes back into use.

IGBC were worried by the approach and attitude of some of the Local Authority speakers at the workshop on the 2<sup>nd</sup> of August who claimed that by taking a minimalist approach they could bring back homes into use for very little by targeting a minimum energy performance of a C2 versus having to build new A3 rated homes. There is a danger here of undermining the government's own commitment to the implementation of nZEB, and tackling climate change. Projects funded by the state should not be encouraged to take the same attitude often seen in the less progressive parts of the private sector of trying to complete work before regulatory deadlines. **It is expected that any publicly funded projects provide leadership and achieve nZEB irrespective of regulatory cut off dates, and therefore all should comply with the new draft part L 2018.**

Climate Change is the most imminent challenges facing our planet. Bringing back vacant and under-utilised properties into use provides us with a unique opportunity to tackle both the housing crisis and major environmental issues. The IGBC regrets that energy efficiency, climate change and the provision of comfortable decent homes are hardly mentioned in the document. We believe this is another missed opportunity to implement a proper integrated national energy efficiency strategy aimed at full decarbonisation of the Ireland's building stock.

Together the residential and transport sectors account for 29.9% of Ireland's greenhouse gases emissions.

As people living in central locations are usually less reliant on cars, bringing back these properties into use could reduce our fastest growing source of carbon emissions, transport. Reusing these buildings would also reduce the negative environmental impacts associated with urban sprawl such as altered terrestrial water cycle and biodiversity loss.

The Energy Performance of Buildings Directive (EPDB) 2018 recast encourages member states to consider relevant trigger point in the life of buildings. Trigger points can be defined as opportune moments in the life cycle of a building (e.g. from a cost-effectiveness or disruption perspective) for carrying out energy renovation. Regeneration and energy renovation are clearly linked, and the IGBC believes that the document should put a greater emphasis on high quality energy upgrades of these properties.

The IGBC is pleased to see that the department recommend that the design team should explore reuse, recovery and recycling opportunity in that order, and welcome the reference made to "Design out waste: a design team guide to waste reduction in construction and demolition projects". However, as there is an increasing level of demolition taking place, the IGBC believes this section should be expanded and more guidance included. All cases where demolition of substantial buildings are proposed should require comparative calculations for environmental and carbon impacts to justify demolition. The IGBC, with the support of the EPA, has facilitated this by the development of Environmental Product Declarations Ireland ([EPD Ireland](#)) and the promotion of Life Cycle Assessment (LCA). The "[Towards a circular economy in construction](#)" report recently published by the IGBC also provides useful guidance and case studies. We suggest the Department include a link to this document and to [EPD Ireland](#) in the final version of the manual.

7. Furthermore, the IGBC believes that the upgrading of homes in itself is not enough to regenerate communities. Thriving communities also depend on a high quality, sustainable public realm, good transport and connectivity, adequate security, and the provision of amenities and green space.

In Ireland, there is a perceived higher quality of life in the commuter belts when measured against concerns related to anti-social behaviour, traffic, or access to some services in urban areas. However, the examples of Paris<sup>1</sup> or Copenhagen<sup>2</sup> show that higher density areas can be associated with high quality of life.

Although the [Home Performance Index](#) has been developed for new homes some of the indicators can play a positive role in ensuring that both homes and neighbourhood are attractive and sustainable. In particular, the following considerations should be taken into account:

1. Good quality, healthy, bright dwellings with excellent daylighting, thermal comfort and adequate private space
2. Guaranteeing excellent acoustic privacy between dwellings
3. Walkable distance to amenities, education, health facilities and transport
4. Walkable access to parks and places where children are safe to play.

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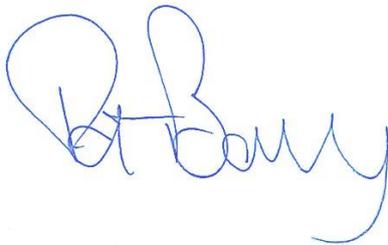
<sup>1</sup> [Brueckner, Thisse and Zenou, 1999](#)

<sup>2</sup> Mick Bradley, presentation on Copenhagen's development strategy, Better Homes 2017.

In parallel to upgrading these buildings, this may require renewal of public spaces so that people feel safer, happier and more likely to use them, as well as improvement of public footpaths and links to local cycling and public transport networks.

8. To bring these buildings back into use and to create vibrant communities, the IGBC call for a fully integrated cross-departmental approach. A successful regeneration strategy will have positive impacts on the housing crisis, on citizens' health and wellbeing, our environment and the economy – directly through job creation and innovation, and indirectly by making our towns and cities more attractive. Planning for better quality, more sustainable homes and neighbourhoods is not only good for the planet, it is good for people and makes economic sense. The Departments of Transport, Climate Action, Health, Jobs and Finance should hence be directly involved in the development and implementation of the strategy.

Yours faithfully



Pat Barry

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