Activity 4C: Policy Development – Real-world Energy Consumption

The issue
Building regulations and Energy Performance Certificates (and therefore all other metrics that use them) use are based solely on the theoretical energy consumption of buildings. In reality, buildings can use twice or even three times the energy that they are predicted to use.

This discrepancy can be for a number of reasons (some technical and some behavioural) such as:
- Controls difficult to use
- Poor build quality
- User behaviour
- Changes in operational patterns of building
- Poor commissioning
- Lack of sub-metering leading to a lack of knowledge around energy use

NPPF guidance
None

What would a policy seek to achieve?
Planning involvement usually ends when a building is occupied so there would need to be a policy that requires a developer to carry out future actions.
Can it ever be applied to individual domestic or developer-led domestic scale?
Can the policy ever penalise the owners of buildings where consumption is much higher than expected?

Would the policy suit being flexible or can a more rigid policy be implemented?
Flexible policies can accommodate more building types but are also open to interpretation on the part of the developer.
Perhaps this policy would be better suited to apply to certain client types or procurement routes. Speculative developers would have a very different approach to this than owner-occupiers.

What issues or elements of sustainability could a policy conflict with?
None

How could the policy be made implementable?
Initial ideas to promote discussion:
- Developers required to have commissioned the design team to participate in Soft Landings where extended involvement of designers ensures building is being operated as intended in design
- Developers required to have in place a program of seasonal commissioning program
- Program is put in place to ensure behaviour change training focussed on energy efficiency occurs.
- A compliant sub-metering strategy and a contract in place for an energy management company to monitor, benchmark and report on the findings for a number of years.
- How could the policy be evidenced?