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SUFFICIENCY IN THE NATIONAL BUILDING RENOVATION PLANS RECOMMENDATIONS FOR MEMBER STATES



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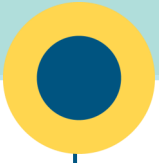
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Sufficiency in the NBRPs: What do the template (Annex II EPBD) and the Commission's annotated guideline say?

National Building Renovation Plans (NBRPs) are in essence the roadmaps to guide the decarbonisation of national building stocks. **Member States were required to submit the first draft NBRPs by 31 December 2025, with final versions due by the end of 2026.** The **template** included in **EPBD Annex II** sets out the required content in more detail, including both mandatory and optional indicators¹. To support Member States in preparing their plans, the Commission published an **annotated template in June 2025**, designed to streamline and clarify the drafting process.

Both EPBD Annex II and the annotated template refer to sufficiency, but neither provides a definition or illustrative examples of the types of measures that could fall under this category. This document aims to fill that gap by providing inspiration and support for Member States in formulating effective sufficiency measures that can contribute to multiple policy objectives simultaneously.

- **Annex II EPBD refers to sufficiency in part c) "Overview of implemented and planned policies and measures",** where **sufficiency measures** are mentioned in the **context of district and neighbourhood approaches**².
- The **Commission's annotated template for the NBRP** places even stronger emphasis on sufficiency and briefly clarifies its meaning: **"... Sufficiency (make the most of the existing stock, renovate instead of building new)."**³
- Sufficiency is **also referenced in part c) under section (j),** which concerns **"the reduction of whole-life -cycle GHG emissions for the construction, renovation, operation and end of life of buildings."**
- The guideline further notes that: **"as operational emissions are tackled elsewhere, this should focus on embodied emissions",** and be **"combined with measures to prevent ... CDW (Construction and Demolition Waste)."**⁴
- Additionally, in **part c) under section (d) on housing affordability,** the Member States are invited to include measures on **data collection on vacant buildings** and facilitation of their renovation, conversion or repurposing. This recommendation aligns with sufficiency principles, even if the term is not explicitly used.

Embodied carbon emissions are the GHG emissions associated with the material extraction, manufacture, construction, maintenance, renovation and demolition of a buildings. A disproportionate amount of these emissions are released before the building is handed over for use and operation ('upfront carbon spike').

¹ For more guidance on NBRPs in general see BPIE 2025: [Delivering the EPBD. A guide towards better, affordable and more resilient buildings for all in Europe](#). Chapter 1.2

² EPBD, Annex II: [Directive - EU - 2024/1275 - EN - EUR-Lex](#), part c), section (k).

³ COM 2025: [NBRP annotated template](#), p. 38

⁴ To be reported in the same part c) under section (g)



'Sufficiency' in the building sector: How can local and national policymakers benefit from integrating it in broader climate and energy plans ?

- **Local, regional and national decision-makers face the challenge of tackling multiple issues at once:** meeting climate goals, reduce land-sealing and biodiversity loss, providing affordable housing, strengthen communities and revitalise regions, all while struggling with tight municipal budgets.
- **The concept of sufficiency offers a systemic approach for the built environment** that can support these objectives. Sufficiency means reducing the absolute consumption of energy and material resources while ensuring a decent life for all. Applied to the building sector, it means above all **'making the best use of existing buildings'** to create a built environment that is attractive, affordable, and aligned with the actual space and accessibility needs of occupants, all while respecting planetary boundaries⁵.
- **Europe's building stock holds significant untapped potential:** 34% of the EU population lives in underoccupied homes⁶, **20 — 25% of housing remains under-utilised**, 6–17% of residents live in overcrowded conditions, average office occupancy rate is around 57%⁷, vacancy rates are often not known.
- Applying sufficiency measures, such as **renovating and repurposing vacant buildings, converting office space into housing, subdividing large houses, and behavioural measures** such as space sharing or flexible time-use, can address this fundamental misallocation of space and mismatch of Europe's housing system.⁸
- Prioritising existing buildings can thus not only help to **reduce the life-cycle GHG emissions** of the built environment, but also **to reduce infrastructure costs** for local authorities by avoiding urban sprawl and commuting, **reduce land-take and resource consumption**, while providing **affordable, high-quality housing** in a cost and time effective manner and **revitalising neglected neighbourhoods**.

⁵ BPIE 2024: Prioritising existing buildings for people and climate. Sufficiency as a strategy to address the housing crisis, achieve climate & resource targets and revitalise communities.

⁶ Eurostat. Housing in Europe 2023. interactive edition.

⁷ Savills 2023: Spotlight: European Office Occupancy Rates.

⁸ BPIE & Ramboll 2024: Sufficiency in the built environment – for the Whole Life Carbon Roadmap. Final report for DG Environment; European Environmental Bureau (2024): Sufficiency in the built environment: A Factsheet.





Inspiration and examples

Guidance for Member States on what to include in the NBRPs

How can Member States follow the recommendation to include sufficiency in their NBRPs? The following section provides practical examples for translating sufficiency principles into concrete policies and measures.



Prioritise the existing building stock in Public Procurement and other strategies

Why?

Since the revitalisation and conversion of existing buildings is not yet the norm, strategically prioritising such approaches can help unlock their benefits for the climate, the environment, and people. Embedding sufficiency principles across key policy areas ensures that the advantages of reusing existing buildings are systematically realised.

What?

Member States can report where such prioritisation is already in place or where it will be introduced, e.g. in public procurement, housing and regeneration strategies, land-use targets and other environmental and climate policy strategies.

Example: In Barcelona, The Sustainability Protocol of the Metropolitan Region⁹ mandates prioritisation of conversion over new construction. It also sets carbon footprint threshold values for both new built and conversion projects, to ensure that conversion options are implemented in a climate-efficient manner.

The French Climate and Resilience Law from 2021¹⁰ promotes the goal of net-zero land take, encouraging development within the existing built environment over greenfield sites.



Plan to gather data on vacancies and under-used spaces

Why?

National and regional authorities often lack reliable data on vacancy or under-used properties. This makes it difficult to match housing needs with vacant or under-utilised buildings and limits the potential for converting, renovating, or adapting these spaces.

What?

Measures already taken to improve data and monitoring, or plans to improve the data situation, could be reported in the NBRPs. These may include introducing reporting obligations, the use of existing administrative databases and datasets, digital tools, or local surveys to identify vacancies and under-occupied buildings. For vacant buildings owned by public authorities, synergies with the data collection required under the EED (Article 6) should be exploited.

⁹ AMB Sustainability Protocol: [Criteria for AMB and IMPSOL projects and works](#); also see: BPIE 2025: [Conversion of offices into affordable housing. Final report for DG Environment](#).

¹⁰ Légifrance. [Loi n° 2021-1104 du 22 août 2021 portant lutte contre le dérèglement climatique et renforcement de la résilience face à ses effets](#) (EN: Act on combating climate change and strengthening resilience to its effects).

Examples: The French National Plan to Combat Vacancy from 2021 developed a dataset in collaboration with local authorities to identify and address vacancies¹¹. This plan not only provides municipalities with vacancy data but also offers tools for contacting owners of vacant properties. It has improved understanding of the root causes of vacancy and strengthened the capacity of regional authorities to develop solutions.

Another example is the Vacancy Ordinary from Utrecht¹² (The Netherlands) established in 2023. It requires owners to report residential properties vacant for more than six months. Based on these declarations and municipal investigations, Utrecht municipality maintains a vacancy register. After three months, the municipality contacts owners to discuss bringing the property back onto the market. If a building remains vacant for a year, the municipality may propose a tenant and request the owner to offer a rental agreement. Exceptions apply to certain associations and secondary residences.



Leverage the potential of district-level approaches

Why?

Addressing vacancy on a building-by-building basis is unlikely to address structural challenges such as degraded public spaces, weak mobility links, and socio-economic challenges. Integrated district- or neighbourhood-level regeneration can provide a more effective and cost-efficient approach by coordinating renovation, land-use planning, and community services. However, municipalities often lack the means, such as flexible funding and relevant data, to take targeted action.

What?

Local authorities should prioritise establishing district/neighbourhood-level regeneration programmes that bundle renovation of vacant or underused buildings with upgrades to energy systems, mobility, green infrastructure, and socio-economic support. These programmes should integrate vacancy data, involve residents from the outset, and coordinate funding streams to ensure affordability and long-term sufficiency.

Examples: In Chemnitz-Brühl, Germany, an integrated district level regeneration programme renovated 90% of buildings, deployed a low-temperature district heating network, transformed vacant structures, and stabilised heating costs for residents.¹⁴

Santa Coloma de Gramenet (Spain) combined building upgrades with redesigned public spaces and resident engagement, reducing energy demand by 36% while preventing displacement of low-income households.¹⁵



Integrate sufficiency advice in One-Stop-Shops

Why?

Surveys in different Member States show that a share of the population considers their home too large or reports feelings of loneliness. Many are open to changing their living situation but often do not know how to begin.

¹¹ French national Plan to combat vacant houses; also see BPIE & Ramboll 2024: *Sufficiency in the Built Environment – for the Whole Life Carbon Roadmap*.

¹² Local Laws and regulations. *Vacancy Ordinary from Utrecht*.

¹³ See also: Climate Action Network Europe (2025). *Beyond the Building-by-Building approach: Unlocking the Neighbourhood and District-Level Integrated Renovations Potential*.

¹⁴ RIFS Policy Brief, 2024. *Lokale Strategien für die energetische Sanierung stärken* (EN: Strengthening local strategies for energy-efficient renovation). See also: Climate Action Network Europe (2025). *Beyond the Building-by-Building approach: Unlocking the Neighbourhood and District-Level Integrated Renovations Potential*.

¹⁵ Román-López et al. 2021. *Área de conservación y rehabilitación 1: Carrer Pirineus, Santa Coloma de Gramenet Barcelona* (EN: Conservation and rehabilitation area Santa Coloma).

What?

Article 18 of the EPBD mandates the roll-out of One-Stop-Shops (OSS) to provide integrated renovation advice. These platforms could also offer guidance on sufficiency measures for households. OSS and local contact points could advise on legal and financial options that help owners or tenants make better use of existing living space, for example, by restructuring floor plans, sharing or subletting homes, or engaging in home-swaps.

Examples: Göttingen, Germany, has set up a Living Space Agency ('Wohnraumagentur')¹⁶ within the local public administration. It provides comprehensive guidance and support to promote more efficient use of existing living space as part of a strategy for affordable and future-oriented housing. The agency offers advice on affordable and innovative concepts for space-saving and communal living models.



Strategy to make public owned vacant offices available for conversion into social housing

Why?

The conversion of office space into affordable housing can deliver environmentally friendly and low-cost homes in central urban areas. However, for social housing agencies involved in such projects, the purchase price of the building is often a decisive factor for economic viability.

What?

When the public sector provides buildings in good locations at reduced prices, it can significantly improve the financial feasibility of office-to-housing conversions while helping to create urgently needed housing in cities.

Example: Municipalities, such as Barcelona and Cork sold office buildings to a reduced price to social housing developers, who transformed the vacant building into affordable and inclusive housing.¹⁷

The French national law Loi Duflot II encourages, among other provisions, the sale of public buildings at reduced price for social housing purposes.¹⁸



Adapt building regulation to make repurposing and reuse of existing buildings easier

Why?

Building regulations can sometimes obstruct conversion and repurposing projects. Rigid requirements tailored for new constructions, e.g. acoustic insulation, plumbing and electrical wiring requirements, minimum distance between building units and neighbouring properties, or provisions imposing a minimum number of parking spaces per resident in densely built-up urban areas, can make adapting existing buildings unnecessarily difficult.

What?

A more flexible and pragmatic conversion code would better support such projects. This should not imply deregulation, therefore minimum quality design standards covering both technical requirements (e.g.

¹⁶ Stadt Göttingen. Wohnraumagentur; also see: BPIE 2024: Prioritising existing buildings for people and climate. Sufficiency as a strategy to address the housing crisis, achieve climate & resource targets and revitalise communities.

¹⁷ BPIE (2025): Conversion of offices into affordable housing. Final report for DG Environment.

¹⁸ Also referred to as law ALUR; Loi pour l'accès au logement et un urbanisme rénové, (EN: Law for Access to Housing and for Renovated Urbanism).

energy performance, comfort, safety) and community involvement should be maintained to ensure that conversions do not result in the creation of substandard units.

Example: In 2024 the Swedish Government has tasked the Building Authority Boverket with amending the current building code to simplify rules and cut costs for adapting and converting of existing buildings¹⁹.

The German federal state of Lower Saxony has amended its building code in 2024, which facilitates better use of the existing stock by simplifying procedures and making certain measures (such as conversions, vertical extensions and changes of use) exempt from approval. It also replaces fixed parking space requirements for the construction of new residential units.²⁰

Incentives for updating zoning to allow mixed-use and/or fast-track permitting for conversion

Why?

Smooth permitting processes are essential to accelerate conversion projects and make better use of existing buildings. Lengthy permitting procedures can increase project costs and risks, discouraging adaptive reuse.

What?

Streamlining approvals for zoning changes from commercial to mixed-use, introducing multi-purpose permits, and establishing expedited “fast-track” processes can incentivise conversion projects and enable faster, lower-cost delivery. Such measures should be contingent on safeguards that ensure public benefits, such as reductions of whole-life carbon, long-term affordability for tenants, and positive contributions to the surrounding neighbourhood.

Example: The Swedish government has introduced a planning incentive to reward municipalities for revising their land use plans to allow, for example, for the conversion of office spaces into residential units²¹.

France has introduced a “reversible building permit” in June 2025, allowing a building to be authorised for several successive uses without needing a completely new permit when changing use (e.g. office, first, housing later). Change of use then only requires an advance notification and not full re-permitting²².

Funding programmes to make best use of the existing building stock

Why?

The legal, administrative, market and business environment is still strongly tilted toward new construction, making conversion or adaptive reuse more complex, risky and financially less attractive. Targeted financial incentives can help correct this imbalance and encourage the reuse of existing buildings.

What?

Subsidy programmes can be designed explicitly to support the use of existing buildings, or they can reward projects that achieve more ambitious life-cycle GHG targets, for example, by offering a bonus when lower embodied-carbon levels are achieved. Because conversions retain the load-bearing structure and avoid major new material inputs, they generally make it easier to meet ambitious embodied carbon thresholds.

¹⁹ Regeringskansliet Website 2024. [Government assignments from the Ministry of Rural Affairs and Infrastructure](#) (machine translation).

²⁰ Architekturbblatt (2024): [Erste Umbauordnung beschlossen](#). (EN: First ‘conversion code’ adopted).

²¹ Svensk författningssamling 2023. [Regulation on support to municipalities for detailed plans that enable single-family housing construction and conversions from commercial premises to residential properties](#) (machine translation).

²² Légifrance. [LOI n° 2025-541 du 16 juin 2025 visant à faciliter la transformation des bureaux et autres bâtiments en logements \(1\)](#) (EN: Act to facilitate the conversion of offices and other buildings into housing).

Example: In early 2025, Hamburg introduced the additional funding module “Sustainable Construction”, which grants financial bonus for residential housing that demonstrate lower embodied carbon emissions than conventional construction²³. The scheme applies to both new builds and conversions, with the latter generally making it easier to meet the respective limit values. The principle is straightforward: the lower the life-cycle GWP per m², the higher the bonus.



Tax measures on vacancies and/or reduced VAT for conversion and renovation

Why?

Tax systems are often not designed to encourage the renovation and/or conversion of vacant buildings.

What?

One possible measure is the introduction of vacancy taxes, intended to incentivise owners to return empty properties to the market. In addition, reduced VAT rates can be used to promote conversions and renovation work.

Example: In France, a tax applies to vacant buildings in municipalities with dense housing markets; other municipalities, that are not on the list established in the decree, are free to decide to impose the tax.²⁴

In Belgium in the Brussels Region it is an offense under the Brussels Housing Code to keep a property unoccupied for more than twelve months²⁵.

In Ireland, tax incentives are granted for the renovation or conversion of owner-occupied homes or rental properties in historic city centre areas. This also includes tax relief for the conversion of retail space into homes²⁶.



Regulate short-term rentals

Why?

Short-term rentals can lead to eviction and housing shortage especially in tourist cities. Buildings are kept empty for large parts of the year to maximise short-stay revenue.

What?

Prioritising long-term occupancy over short-term stays helps to ensure that the housing stock is used to meet resident’s essential housing needs and reduces the pressure to build new accommodation.

Example: Barcelona has implemented strict regulations on short-term rentals to address housing shortages and the impact of mass tourism on local communities. The city has decided not to renew any new tourist-flat licenses, revoking all existing licenses by end of 2028, to turn those properties back into long-term housing stock.

²³ IFB Hamburg. Mietwohnungsneubau 1. Förderweg. (EN: New rental housing construction 1st funding channel). Chapter 3.2.3.

²⁴ Gouvernement. 2025. Que sont les taxes sur les logements vacants? (EN: Everything you need to know about taxes on vacant housing).

²⁵ Brussels Capital Region. Empty properties: what to do with vacant houses.

²⁶ Department of Housing, Local Government and Heritage (2025). The Living City Initiative.



Absolute metrics in the National WLC Roadmaps (Article 7 EPBD)

Why?

Article 7 of the EPBD mandates the assessment of life-cycle GWP of new constructions. As the metric expresses GHG emissions per m² per year (kgCO₂-eq/m²/yr) it remains a *relative* indicator and therefore neither penalises oversized designs nor promotes space-saving or sufficiency-oriented design. Furthermore, current limit values are derived from bottom-up benchmarks that reflect today's typical construction practices and, as such, are not guided by climate targets defined in the Paris Agreement.

What?

To integrate sufficiency principles into new buildings, the introduction of absolute metrics – such as life-cycle GWP per capita or function – should be considered in the National Roadmaps in which Member States define WLC limit values.

Example: While no regulation yet sets top-down limit values for life-cycle GWP per capita or function, some academic and industry initiatives offer useful guidance for establishing ambition levels aligned with climate targets. For example, [Hørup et al.](#) propose a science-based top-down method for setting allowable upfront emissions in new buildings.²⁷ Similarly, the [Danish Reduction Roadmaps](#) targets drastically lower life-cycle GHG limit values aligned with planetary boundaries.²⁸



Prevent unnecessary demolition by introducing mandatory pre-demolition audit linked to WLC assessment²⁹

Why?

Demolishing and build new remains a default approach, even when adaptive reuse or renovation would deliver significant GHG and resource savings and help preserve cultural and architectural heritage.

What?

Mandatory pre-demolition audits, which assess materials and their re-use potential, can be linked to Whole-Life-Carbon requirements. Demolition would be approved only when the combined emissions from demolition and reconstruction are demonstrably lower than those of a reuse or renovation scenario. Making this link can substantially reduce CDW and promote a mindset-shift towards preserving existing buildings as the new norm.

Example: The [France Climate and Resilience Law \(2021\)](#) promotes repurposing and conversions by requiring a "*diagnostic de réversibilité*", an assessment of a building's potential for conversion or alternative future use prior to any demolition or new construction project³⁰.

In [Germany](#), the German Institute for Standardisation (DIN e. V.) has published DIN SPEC 91484, a standard outlining procedures for recording construction products to identify their reuse potential ahead of demolition or renovation³¹. Developed jointly with industry stakeholders, it serves as a practical guide for pre-deconstruction audits and forms a basis for future regulatory development.

²⁷ Horup et al. (2023): [Defining dynamic science-based climate change budgets for countries and absolute sustainable building targets.](#)

²⁸ [Reduction Roadmap Denmark](#); also adapted for Swedish conditions in [Reduction Roadmap Sweden](#).

²⁹ Noted in part c) under section (g) the CDW related policies and measures.

³⁰ [Légifrance. Loi ° 2021-1104 du 22 août 2021 portant lutte contre le dérèglement climatique et renforcement de la résilience face à ses effets](#) (EN: Act on combating climate change and strengthening resilience to its effects).

³¹ Pre-demolition audit [DIN SPEC 91484:2023-09](#)

