

CIC Consultation Response

Annex B: Response Proforma

DEFINITION OF ZERO CARBON HOMES AND NON-DOMESTIC BUILDINGS: CONSULTATION

Respondent Details:	
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Is your response confidential? If so please explain why. (See disclaimer on page 13)	
Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Comments:	
Are you responding as an individual? <input type="checkbox"/> Or are you representing the views of an organisation <input checked="" type="checkbox"/> ?	
If you are responding on behalf of an organisation, please say who the	

organisation represents and, if applicable, how the views of members have been assembled.

The Construction Industry Council is a body representing the views of 31 member organisations which in turn represent the construction professions, research organisations and specialist business bodies. There are also another 30 affiliates and associates who are also members of CIC. The consultative document was sent to members and posted on the CIC website. Responses were invited and a meeting arranged to discuss the document.

Provision is made throughout this questionnaire for you to provide additional comments. If, however, you wish to provide more detailed comments on any aspect of the consultation then please feel free to append additional materials and supplementary documents, clearly marked and cross referenced to the relevant questions, as necessary.

Organisation type (tick one box only)			
House or property developer	<input type="checkbox"/>	Local authority – Planning	<input type="checkbox"/>
Commercial Developer	<input type="checkbox"/>	Local authority – other (please specify)	<input type="checkbox"/>
Housing Association (Registered Social Landlords)	<input type="checkbox"/>	Approved Inspector	<input type="checkbox"/>
Property Management:		Professional body or institution	<input checked="" type="checkbox"/>
Residential	<input type="checkbox"/>		
Commercial	<input type="checkbox"/>		
Public sector	<input type="checkbox"/>		
Builder – Main Contractor (commercial/volume house builder)	<input type="checkbox"/>	Trade body or association	<input type="checkbox"/>
Builder – Small Builders (repairs/maintenance, etc)	<input type="checkbox"/>	Householder:	
		Homeowner	<input type="checkbox"/>
		Tenant	<input type="checkbox"/>
Builder – Specialist Sub Contractor	<input type="checkbox"/>	Energy sector:	
		Generation	<input type="checkbox"/>
		Transmission	<input type="checkbox"/>
		Distribution	<input type="checkbox"/>
		Supplier	<input type="checkbox"/>
		Energy Service Company	<input type="checkbox"/>
Manufacturer	<input type="checkbox"/>	Other non-governmental organisation	<input type="checkbox"/>
Architect	<input type="checkbox"/>	Specific interest or lobby group	<input type="checkbox"/>
Civil/Structural Engineer	<input type="checkbox"/>	Research/academic organisation	<input type="checkbox"/>
Consultancy	<input type="checkbox"/>	Journalist/media	<input type="checkbox"/>
Individual in practice, trade or profession	<input type="checkbox"/>	Development funder	<input type="checkbox"/>
Local authority – Building Control	<input type="checkbox"/>	Other (please specify):	<input type="checkbox"/>

Geographical Location

England	<input checked="" type="checkbox"/>	Wales	<input type="checkbox"/>
England and Wales	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>

Questions

Section 4: Overview of Proposed Approach

Q1. Do you agree that the Code for Sustainable Homes should be revised to reflect the approach to zero carbon homes described in the hierarchy set out in Section 4?

Yes No Do not know

If you agree, how do you think the Code should be revised?

The roadmap to zero-carbon has been defined by the Code for Sustainable Homes which needs to be revised and updated on a very regular basis. While a flexible approach to defining zero carbon is necessary, consistency of approach is vital and for this reason we support the adoption of a similar framework for non-domestic buildings.

If you have any further comments on Section 4 please add them here

CIC feels that clarity in respect to targets and timescales will provide much needed focus for the construction sector which responds well to defined objectives. We endorse the hierarchical approach outlined in this consultation which focuses on : energy efficiency, carbon compliance and allowable solutions but feel that it needs to be supplemented by a rigorous review of the national energy strategy as the long term energy mix will be a vital component in achieving 80% reduction targets.

Section 5: Energy Efficiency and Carbon Compliance

Q2. Government is minded to require very high levels of energy efficiency in 2016, broadly equivalent to some of the most demanding standards currently published by third parties (such as PassivHaus and Energy Saving Trust). Do you agree with that ambition?

Yes No Do not know

If you do not agree to setting very high energy efficiency standards for homes, please say why you disagree.

Q3. Do you agree that the approach to carbon compliance should not favour a direct physical connection of electricity or of private wire over connections via the distribution network?

Yes No Do not know

Q4. Government is minded not to allow offsite renewable electricity to be claimed as part of the carbon compliance calculations. Do you agree with this approach?

Yes No Do not know

Q5. Is the Building Control system the right regulatory framework for monitoring and enforcing carbon compliance?

Yes No Do not know

If not, what approach would you prefer and why?

This is the right framework but it also needs the linked to a co-ordinated approach in relation to planning and a proper programme of post-occupancy evaluation.

Q6. Does the analysis of carbon dioxide reductions from different technologies and the associated costs set out in Annex E look about right to you?

Yes No Do not know

If not why not?

Q7. Is it right to rule out a carbon compliance level based on eliminating 100 per cent of regulated emissions plus emissions from cooking and appliances onsite as from 2016?

Yes No Do not know

If not, why not?

Q8. Assuming feed-in tariffs and renewable heat incentives cannot be claimed towards the cost of installing low and zero carbon energy in support of a new home, which of the following carbon compliance levels would you favour for 2016 (please tick):

(i) a continuation of the 44% to be introduced from 2013

or (ii) 70%

or (iii) 100%

Please give reasons for your preference:

100% is unrealistic. 70% is a reasonable compromise to aim for.

Q9. If feed-in tariffs and/or renewable heat incentives could be claimed by a house builder or energy service company, what would be your answer to the previous question (please tick)?

- (i) a continuation of the 44% to be introduced from 2013
- or (ii) 70%
- or (iii) 100%

Please give reasons for your preference:

Carbon compliance should be positive and reflect a level of aspiration but there also needs to be a practical evaluation of what can be expected from the house-building industry in the present climate

Q10. Following the outcome of this consultation, should Government indicate the level of carbon compliance proposed for 2016 as:

(i) a single number

or (ii) a range, with the final number to be decided through subsequent Part L reviews?

If you prefer a range, how wide should the range be (please express as a number)?

If you have any further comments on Section 5 please add them here

A single number has the advantageous of simplicity and ties in with analogous rating systems for electrical appliances etc.

Section 6: Allowable Solutions

Q11. Do you disagree with the inclusion of any of the allowable solutions listed in Section 6.3?

Yes **No** **Do not know**

If you do disagree, please list which allowable solutions you disagree with and state your reasons.

Each of the allowable solutions has merit. Having a range to choose from will improve the likelihood of the policy working in practice

Q12. Assuming directly connected offsite renewable electricity does not count towards carbon compliance, should it count towards the allowable solutions?

Yes **No** **Do not know**

Q13. Are there any further measures which you think should be added to the list of allowable solutions at this stage?

Yes No

If so, what are they and why should they be added now?

There is nothing to be added at this stage but any listing should allow for future innovation.

Q14. Please provide any views on how the Community Infrastructure Levy (CIL) might be used as an allowable solution in a way that is consistent with the Government's approach to the CIL.

As a complementary measure to existing section 106 solutions CIL has a role to play.

Q15a. Paragraph 6.6 notes that carbon compliance measures and nearly all the allowable solutions relate to measures undertaken in the locality of the housing development. Do you agree that this provides sufficient emphasis on local measures?

Yes No Do not know

Comments:

This is primarily a national issue.

Q15b. Alternatively, would you favour an approach which gives further prioritisation to local emissions reductions?

Yes No Do not know

If so, how do you suggest this should be achieved?

Should there be a further distinction between reductions achieved in the same government office region as the zero carbon home versus reductions achieved elsewhere in the UK?

Yes No Do not know

Comments:

Q16. Do you agree that the review mechanism proposed for 2012 will provide predictability for industry now, while enabling the policy to be adjusted in the light of developments between now and 2016?

Yes No Do not know

Comment

Until they know the outcome of the review, there is no predictability for industry. Industry will need time to gear up for these changes.

Q17. Should development on brownfield land be subject to derogations from allowable solutions that are not available to other forms of development?

Yes No Do not know

If you agree the brownfield land should be subject to such derogations, please say how this could be done?

Q18. Do you agree with the proposed scope of the review mechanism?

Yes No Do not know

If not, please set out what you think the scope should be.

A review must be based on measured evidence. Life-time carbon costs and embodied energy needs to be considered.

Q19. Is 2012 the right time to undertake a review of the allowable solutions?

Yes No Do not know

If not, do you think the review should be (i) earlier , or (ii) later ?

Comments:

This is a reasonable date to choose but in many ways the review process needs to be continuous to reflect the continuous change in knowledge.

Q20. Please indicate which one of the following is your preferred basis for setting the capped cost:

(i) Shadow Price of Carbon

or (ii) price of carbon dioxide implied by Renewable Obligation Certificates;

or (iii) price of carbon dioxide implied by incentives for emerging renewable technologies (ie two ROCs)

Please give reasons for your preference.

The shadow price of carbon is too low at present.

Q21. Of the following, which is your preference as to the number of years of residual emissions to be covered via allowable solutions:

(i) 30 years

or (ii) 60 years

Please give reasons for your preference.

Sixty years is the general life expectancy of a building.

Q22. If you do not think that either 30 or 60 years is appropriate, then please say what your approach would be.

<p>Q23. Do you consider that the role outlined for Local Planning Authorities in paragraphs 6.52 - 6.56 is reasonable in relation to their capacity and expertise?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> Do not know <input checked="" type="checkbox"/></p> <p>Comments:</p> <p>There would appear to be too many people involved in this exercise to achieve a single goal.</p>
<p>24. Do you consider that the role outlined for Building Control Bodies in paragraphs 6.52 - 6.56 is reasonable in relation to their capacity and expertise?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Do not know <input type="checkbox"/></p> <p>Comments:</p> <p>Resources, education and training need to be required. The role of the planning authorities also needs to be considered in relation to this.</p>
<p>If you have any further comments on Section 6 please add them here</p>
<p>Section 7: Costs and Benefits</p>
<p>Q25. Do you agree that the Impact Assessment broadly captures the types and levels of <u>cost</u> associated with the policy?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> Do not know <input checked="" type="checkbox"/></p> <p>If you do not agree, please say why not.</p>
<p>Q26. Do you agree that the Impact Assessment broadly captures the types and levels of <u>benefits</u> associated with the policy?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> Do not know <input checked="" type="checkbox"/></p> <p>If you do not agree, please say why not.</p>

Q27. Do you agree that the Impact Assessment reflects the main impacts that particular sectors and groups are likely to experience as a result of the policy?

Yes **No** Do not know

If you do not agree, please say why not.

If you have any further comments on Section 7 please add them here

Section 8: New Non-domestic Buildings

Q28. Do you agree with the Government's policy objectives for carbon reductions from non-domestic buildings set out in paragraphs 8.1 - 8.17?

Yes **No** Do not know

If not, why not?

What alternatives do you propose?

Q29. When considering how to achieve the policy objectives set out in paragraphs 8.1 - 8.17 do you agree that the Government should consider the same policy mechanisms for non-domestic buildings and for domestic buildings?

Yes **No** Do not know

Comments:

A consistent approach favours understanding and implementation

Q30. Do you think that Government should work on the presumption that zero carbon for non-domestic buildings should cover both regulated and unregulated emissions, as for domestic buildings?

Yes No Do not know

Comments:

Q31. Do you think that Government should exclude some elements of energy use for non-domestic buildings from the definition of the zero carbon standard, such as energy for industrial processes?

Yes No Do not know

If yes, which elements of energy use should be excluded and why?

Heating requirements might be an issue and insulation measures in as far as they relate to heating may also need to be considered.

Q32. As the Government considers policy for zero carbon in new non-domestic buildings, do you agree that we should follow the same hierarchy as for homes, recognising that the timing and level of different thresholds may need to be adapted to reflect the different types of non-domestic buildings?

Yes No Do not know

If you disagree, what alternative would you suggest and why?

Q33. We would welcome further evidence on the practicality and costs of meeting particular thresholds for energy efficiency or carbon compliance for different types of non-domestic buildings.

Q34. Notwithstanding a future decision on the regulatory aim for zero carbon for non-domestic buildings and the outcome of the forthcoming Part L consultation, would you see advantages in setting milestones towards that goal after 2013?

Yes **No** Do not know

What approach would you favour and why?

A constant review is needed.

Q35. Do you agree that the Government should base any support for sustainability tools on the criteria set out in paragraph 8.51?

Yes **No** Do not know

Are there any other criteria which should be used also?

Q36. Are there any other areas, apart from those listed in paragraph 8.52, that Government should encourage a sustainability tool for non-domestic buildings to cover?

Yes **No** Do not know

If yes, which areas?

These tools need to be applied to post occupancy evaluation to allow evidence to be gathered in relation to actual performance.

If you have any further comments on Chapter 8 please add them here

Please make any further additional comments here, ensuring that you clearly refer to any relevant questions or responses submitted above.

Any other comments:

We should not be talking about "zero" carbon homes or buildings since such facilities are technically impossible. We should refer to homes that help people live zero carbon lifestyles and buildings that help businesses achieve zero carbon corporate behaviour.