

Zero carbon for new non-domestic buildings: Consultation on policy options (November 2009) Response form

This form can be downloaded from:

www.communities.gov.uk/publications/planningandbuilding/newnondomesticconsult

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Are you responding as an individual?

Or are you representing the views of an organisation?

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.

BCSC represents businesses operating in the retail property sector, our mission being to promote industry best practice and advance the professional aims of the retail property industry. Our membership is a broad church of nearly 3,000 property professionals including owners, developers, retailers, surveyors, architects and public sector managers. One of our primary aims, as embedded in BCSC's Sustainability Charter, is to significantly reduce carbon emissions from buildings in the retail property sector.

**Is your response confidential? If so please explain why.
(See disclaimer on page 5 of the consultation document)**

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>
Comments	

Provision is made throughout this questionnaire for you to make 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)

Commercial developer	<input type="checkbox"/>	Local authority – Planning	<input type="checkbox"/>
Residential developer	<input type="checkbox"/>	Local authority – Building Control	<input type="checkbox"/>
Property management:		Approved Inspector	<input type="checkbox"/>
Commercial	<input type="checkbox"/>	Trade body or association	<input checked="" type="checkbox"/>
Public sector	<input type="checkbox"/>		
Residential	<input type="checkbox"/>		
Builder – Main contractor (commercial/volume house builder)	<input type="checkbox"/>	Householder:	
Builder – Small builder (repairs/ maintenance, etc)	<input type="checkbox"/>	Homeowner	<input type="checkbox"/>
		Tenant	<input type="checkbox"/>
Architect	<input type="checkbox"/>	Non-governmental organisation	<input type="checkbox"/>
Civil/structural engineer	<input type="checkbox"/>	Specific interest or lobby group	<input type="checkbox"/>
Local authority – Other	<input type="checkbox"/>	Research/academic organisation	<input type="checkbox"/>
		Other (please specify):	<input type="checkbox"/>

Geographical Location

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

CONSULTATION QUESTIONS

Chapter 2

1. Do consultees agree that we should establish challenging energy efficiency standards for non-domestic buildings covering space heating and cooling, and measured on a kWh/m²/year basis? If not, why not, and what approach to setting energy efficiency standards would you prefer?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>
Comment: We agree that Government must set challenging energy efficiency standards measured on an annual basis. We believe that these have to be based on an agreed benchmark, which would also apply to DEC's when required. It should be noted that retailers presently measure the "sales area" in different ways. In order to achieve consistent reporting at a shopping centre level an agreed standard would be necessary. This could perhaps be the gross area of the retail stores. We support the introduction of the kWh/m²/year unit of measurement. However, we would suggest that at present retailers seem to prefer to work in units of ft².	

Chapter 3

2. Which of the three scenarios would you favour as a basis for setting onsite aggregate targets for zero carbon trajectories and why?

Off-site rich	<input type="checkbox"/>
Balanced	<input checked="" type="checkbox"/>
On-site rich	<input type="checkbox"/>
Comments. <i>If you do not agree with any of the three scenarios, please provide comments here, stating why and what you would prefer.</i> We believe that focus must remain on the overall reduction of carbon consumption across the building stock rather than on a particular number of units designed or refurbished to meet the zero carbon standard. BCSC supports the UK Government's proposed definition of zero carbon, with the use of allowable solutions where necessary.	

We do not believe that the use of only onsite solutions would be workable for every site and would therefore prohibit certain developments here in the UK from progressing. BCSC believes that we should be encouraging district heating and cooling schemes. However, we appreciate that these can have a significant cost.

On this point, we are of the view that if the cost of the scheme can be shared between the centre developer and other users via an ESCO this would represent the best way for a shopping centre to meet its reduction targets.

3. What views do you have on the impact of the costs of building to zero carbon standards in different sectors? How and why does sensitivity to new build costs differ between sectors?

Comment:

The costs indicated in table 3.27 indicate that the cost increase for a shopping centre show a relatively low (6%) increase. However, it should be noted that this is for the 'balanced' approach.

We believe that more work would be required to explore the cost viability with scenario 1 and 3.

Chapter 4

4. Do you agree that we should adopt the same measures and approaches for allowable solutions for non-domestic buildings as those for homes?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

Comment:

BCSC believes that comparable methods should be adopted in order to promote simplicity and consistency.

This will enable the wider construction industry to benefit from the learnings of the process involved in reducing emissions in the housing stock. To begin from scratch and develop new allowable solutions and technologies for the commercial sector would be an unnecessary waste of time and money.

We would encourage Government to ensure that local authorities are appropriately involved in situations where 'off site' renewable energy sources such as biomass or CHP are used on a district basis. In these circumstances,

local authority involvement will be crucial at a strategic level.

5. Are there any extra allowable solutions that should be used specifically for non-domestic buildings?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>
Comment: BCSC is of the view that 'off site' renewable sources not directly connected to the building should be deemed 'allowable'. The current scenarios provide for where there is a direct connection with the building either through wires or pipes for heating and cooling liquids. We believe that in many instances this may not be the most efficient use of renewable energy. For instance, if a developer wanted to install wind turbines as part of a renewable 'mix' of energy then the current scenarios would not allow it unless the turbines were directly linked to the building. This could well be unachievable due to the position of the building. Wind turbines are clearly best suited for windy, exposed places, not in city centre developments. If certain dedicated 'off site' renewable supplies were 'allowed' then this would enable and encourage developers to invest in renewable energy sources in the most appropriate places.	

6. Do you agree with the proposal to introduce an element of allowable solutions for non-domestic buildings at 2016? What views do you have on the level at which this should be set, and the impact this will have?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>
Comment: We support the intention of Government to make all buildings as low carbon as possible and applaud the adoption of a hierarchy of allowable solutions, as outlined. We urge the Government to continue to develop a graduated, flexible approach in implementing a zero carbon standard. With this in mind, we would support the proposal to introduce an element of allowable solution for non-domestic buildings, providing that it was not at a prohibitive cost.	

Chapter 5

7. Do you favour an approach of setting a flat rate requirement above 100 per cent regulated emissions to account for unregulated emissions?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>
Don't know	<input type="checkbox"/>

Comment:

We would not support a flat rate requirement above 100 per cent to account for unregulated emissions.

In many commercial buildings (or parts of shopping centres) the final use of the unit may not be known at the time of design/construction.

The energy load in a shopping centre unit could turn out to be just lighting and air conditioning or alternatively it may transpire to be a heavily refrigerated supermarket.

It is true that if a developer is constructing a building where the installed loads of the tenants is known then the extension of the coverage to unregulated energy could be coped with.

However, it must be acknowledged that this is not always the case.

8. Would you favour the 10 per cent allowance, the 20 per cent allowance or another rate? Why?

10 per cent	<input type="checkbox"/>
20 per cent	<input type="checkbox"/>
Other	<input type="checkbox"/>

Comment:

We believe that the 10% scenario needs to be modelled and further work done before a recommendation on this could be made.

Chapter 6

9. Do you agree with the overall work programme we have outlined for the public sector?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>
Comment: We support the principle of the public sector leading the way in driving down carbon emissions. However, we would urge the Government to embed flexibility in this policy to ensure that mixed use (private/public) developments are able to proceed.	

10. Are there other ways in which you think the public sector could usefully provide leadership for the move to zero carbon?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>
Comment: We would strongly welcome a commitment by the Government to provide a body, similar to that of the zero-carbon hub for domestic buildings, to help offer strategic guidance to the commercial property industry as we work to develop low carbon technologies and workable policy frameworks.	

11. Do you agree that the public sector should start trialling allowable solutions from 2015?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>
Comment: We agree that the public sector should start trialling allowable solutions as soon as possible. We are keen to ensure that the industry is able to maximise learning opportunities as we work towards finding the most appropriate technologies for specific sites.	

12. What role(s) do you think local government can play in contributing to public sector leadership on zero carbon buildings?

Comment:

We believe that local authorities can help both the public and private sectors by actively encouraging district energy schemes.

They could also act as a catalyst through providing localised incentives such as a reduction in business rates for fully compliant buildings.

We also think that there may be scope for a relaxation in town planning rules to encourage - reduce obstacles - to CHP & other such low-energy schemes.

Chapter 7

13. Does this package of measures and proposals for next steps address the key delivery issues to make progress towards the zero carbon ambitions? If not, what action is needed and by whom?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

Comment:

The proposed package is certainly a step in the right direction.

However, we believe that further incentives from both Government and local authorities are essential.

We would recommend a policy to be introduced whereby buildings in full compliance are entitled to reduced business rates.

We would also suggest that the Enhanced Capital Allowance schemes could be extended and better coordination between planning and building control is necessary.

General suggestions and observations

14. If you have any other comments on the proposals for zero carbon for new non-domestic buildings, please add them here.

Comment:

We recognise that there are many ways in which shopping centres can reduce their carbon emissions, via both behavioural and technological changes, and as an organisation BCSC is committed to relaying best practice in both of these areas between developers, landlords and retailers.

Shopping centres are often the hub of low carbon energy communities in current mixed-use schemes. Indeed, shopping centres fortified with low carbon CHP technologies are often the most effective way for domestic dwellings in a mixed-use scheme to meet their own low carbon objectives.

BCSC remains committed to seeing that carbon reduction decisions are taken in context, recognising that non-domestic buildings can achieve significant emissions saving goals in conjunction with other types of buildings. Such savings cannot always be guaranteed when the different assets are acting as (and treated as) separate entities.

We look forward to the Government's further work in reducing carbon from non-domestic buildings and to responding to the forthcoming consultation dedicated to developing the trajectory towards the 2019 zero carbon target.