

The Chartered Institute of Building

Submission to

Communities and Local Government

On the Government's consultation about the

Zero Carbon for New Non- domestic Buildings: Consultation on Policy Options

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CLG consultation on Zero Carbon for New Non-domestic Buildings: Consultation on Policy Options

Introduction

The Chartered Institute of Building (CIOB) represents for the public benefit the most diverse set of professionals in the construction industry.

Our Mission:

To contribute to the creation of a modern, progressive, and responsible construction industry; able to meet the economic, environmental and social challenges faced in the 21st century.

Our 7 Guiding Principles:

- Creating extraordinary people through professional learning and continuous personal development.
- Promoting the built environment as central to the quality of life for everyone everywhere.
- Achieving a sustainable future, worldwide.
- Advocating exemplary ethical practice and behaviour, integrity and transparency.
- Pursuing excellence in management practice, and technological innovation rooted in evidence based science
- Being socially responsible and working responsibly
- Enabling our members to find an emotional resonance with the Institute; their success is our success.

We have over 40,000 members around the world and are considered to be the international voice of the building professional, representing an unequalled body of knowledge concerning the management of the total building process.

Chartered Member status is recognised internationally as the mark of a true, skilled professional in the construction industry and CIOB members have a common commitment to achieving and maintaining the highest possible standards within the built environment.

The Chartered Building Company and Consultancy Schemes (CBCs) are a vital part of the CIOB, providing the Institute's members with a further business perspective.

The CIOB is also a member of the Society for the Environment and is able to award the Chartered Environmentalist qualification. We currently have over 280 Chartered Environmentalist members and this number is growing daily.

Our submission has been developed for the public benefit and is also informed by feedback from our members. Feedback has been analysed and this submission represents the consensus viewpoint which has subsequently been reviewed by Ambassador members.

General Comments

The Chartered Institute of Building (CIOB) welcomes the opportunity to respond to this consultation.

1. We agree the rationale for challenging zero carbon regulations given industry reluctance, lack of energy efficiency standards and drivers including a lack of added value in the building, lowest energy prices and energy costs being a small part of the overall business costs. Additionally there is a lot to be gained in a common approach to this issue regarding the use of common units, for example avoidance of confusion and familiarity with approach for all stakeholders such as building designers, builders, owners and occupiers.
2. Of the three scenario's presented, there seems an opportunity for a flexible approach using a bespoke balance of On and Off options. Further there appear some significant disadvantages of wholly one option or another e.g. not all sites have an off site option if they are a geographically isolated development and some non-domestic schemes may not be big enough for a wholly onsite strategy.
3. Further, we consider building costs are currently different for different sectors and building uses, therefore different zero carbon costs will be reflected in these differing types of construction. For example, a 5star hotel compared to a large warehouse.

Additionally operating costs will be different, it follows that cost drivers and incentives may help operational behaviour e.g. city office block owners and operators may be encouraged to turn lighting off overnight using timed controls.

It is thought more focus needs to be put on measuring energy use so clients can see what is happening. So it is suggested that BMS systems and also DECs (display energy certs) for all buildings over 1000m² to give visibility.

Even with the above measures it is still difficult to modify client's behaviour, such as 'open door' policies. Maybe buildings should declare their energy use/ M² and if above the industry average then they should be made to improve or add LZC.

A carrot and stick approach is required to change behaviour or at least raise the profile of energy conservation and fuel use. Possibly increased VAT on commercial energy bills, Link taxation such as business rates to EPC level or make carbon trading happen more fully.

At the same time business needs incentivising in ways to ensure that they purchase older building stock and improve it and do not overlook it as being too much of a liability to take it on if they get hit by LZC or carbon legislation.

We welcome more details from the proposed extra study regarding this proposal.

One further point, there is a great deal of regulation/burden to industry already in the energy conservation field, given that developers need to meet Part L, SBEM & incoming LZC rules, Energy Performance Certificates and then additionally planning often BREEAM and Merton rule requirements for 10-20% renewable.

4. There is a lot to be gained in a common approach adopting the same measures and approaches for allowable solutions for non domestic buildings as those for homes. for example this could avoid confusion with approach for all stakeholders such as building designers, builders, owners and occupiers. However the scale of each project would need to be considered as would Planning issues.

A flexible approach should be allowed as some technologies may lend themselves to larger scale non-domestic projects rather than or in conjunction with homes.

Additionally there should be potential allowance for future innovative solutions.

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Additionally there should be potential allowance for future innovative solutions.

6. If technology and assessment mechanisms are available then dates could be soon, however it may be necessary to introduce a voluntary transfer period to allow for training and give designers options to incorporate into the building designs.

The allowance level perhaps should be relevant to the proposed option in terms of contributed output/potential carbon saving, for example solar power is considered better in most circumstances to wind power.

Government can do more to require businesses to purchase green energy as a proportion of their overall energy requirement. This would then incentivise people to generate more green energy using renewables and surpluses could be exported to the grid for a premium price. This is happening in a very small way currently it is believed.

7. In several areas of this consultation the principle “polluter pays” and incentivisation for carbon reduction is mentioned. We find it difficult to reconcile these principles with a flat rate approach.

We feel there is a danger that a flat rate approach will be seen as just another operating cost/tax type overhead to building owners and occupiers.

Designers only have a short term interest in the building not a longer term interest therefore the incentive for them to ensure low carbon solutions is unclear particularly if there is no obvious incentive for their clients.

A scale would possibly solve this concern, however any scheme should be simple for designers to employ and Building Control professions to use as a basis for regulation.

Any unregulated energy consumption will be difficult to control once the building is constructed and operational. The designers and Building Control professionals will no longer be involved in the project to monitor the success of measures built into the project.

Businesses or large energy users perhaps should be subject to compulsory 'Energy Audits' which cover their estates as often they would not have EPCs as no building sales or leases etc, such as university sites or large industrial complexes.

8. A scale would possibly be a better solution, however any scheme should be simple for designers to employ and Building Control professions to use as a

basis for regulation. Consider the Energy Performance certificate approach or that of white goods.

Any unregulated energy consumption will be difficult to control once the building is constructed and operational. The designers and Building Control professionals will no longer be involved in the project to monitor the success of measures built into the project – additionally consider speculative development.

Businesses or large energy users perhaps should be subject to compulsory 'Energy Audits' which cover their estates as often they would not have EPCs as no building sales or leases etc, such as university sites or large industrial complexes.

9. Only a large sector of industry such as the public sector could make a difference to the wholesale adoption of zero carbon measures, in terms of the goals proposed in this document such as innovation and demonstrable benefits.

Successful adoption by the public sector will reap the benefits and political points to encourage others in these difficult economic times. Technology failure will hinder achievement of goals.

Consider the Design Life of buildings carbon rewards may be increased with longevity of building design which could additionally assist the sustainability agenda.

10. The public sector and Government could assist with the sponsorship of innovation, such as the scheme to promote home loft and cavity insulation – a “cheap” initial cost for maximum benefit approach.

Additionally, barriers need to be removed for all renewables and LZC up to a certain scale (being quite large). They should all get permitted development to encourage use, certainly given the timescales, otherwise I can see wind farms being stuck in planning for at least 5+ years. The same could be said of the River Severn barrage. Maybe national plans need to be developed that show zoned areas for renewables and then get on with it.

More public buildings need to be built quickly to act as exemplars of Zero Carbon, otherwise the 2018 public buildings target is going to be missed. I think talk of the public sector being an 'early adopter' is quite naive and possibly a bit late on. Full details of public building design and energy strategy

should be made public for lessons.

11. Trial projects mentioned in this consultation document seem to imply some proposals are currently a practical approach, continued monitoring and feedback over time will be needed to establish continued good practice. More projects will add to the rigor of the trials.

12. Local Government procurement can support the wider Public Sector initiatives and drivers.

Additionally barriers such as local planning impediments need to be removed for all renewables and LZC up to a certain scale (being quite large). They should all get permitted development to encourage use, certainly given the timescales, otherwise it may be seen that wind farms could stuck in planning for at least 5+ years – consider the recent unsuccessful proposals for a Scottish island. The same could be said of the River Severn barrage.

Maybe national plans need to be developed that show zoned areas for renewables to enable swift construction and adoption of these carbon proposals.

More public buildings need to be built quickly to act as exemplars of Zero Carbon, otherwise the 2018 public buildings target is going to be missed. I think talk of the public sector being an 'early adopter' is quite naive and possibly a bit late on. Full details of public building design and energy strategy should be made public for lessons.

13. The proposed package of measures and proposals seem suitable “in principle”, however there is more work acknowledged to be completed within the document.

Additionally, we believe more thought should be given to regulation of proposals by the Building Control professionals. These individuals whilst eminently placed to perform this function in terms of technical capability, will require additional training.

Further, once to building work is complete Building control professionals have no on-going input to building projects unless it is a licensed premises etc making it difficult to assess unregulated energy use.

It would seem an auditing role is required in this regard, but how such a role would be empowered is unclear.