

Ms. Clover Summers  
Sustainable Buildings Division  
Department for Communities and Local Government  
Zone 5/G10  
Eland House  
Bressenden Place  
London  
SW1E 5DU

23<sup>rd</sup> February 2010

Dear Clover,

Zero Carbon for non-domestic buildings: Consultation on policy options

We are writing to you with the Home Builders Federation response to the Government's consultation on Zero Carbon for non-domestic buildings.

The Home Builders Federation (HBF) is the principal trade association representing private sector house builders in England and Wales. Our members are companies who between them build about 80% of the new homes in England and Wales.

The HBF has considered this consultation with two specific aims and objectives:

- 1) There are HBF members involved in constructing mixed-use developments and any changes to the regulations on Zero Carbon for non-domestic buildings will need to clearly reflect upon this;
- 2) It is necessary to ensure that there is similarity between the requirements for domestic and non-domestic buildings in regards Zero Carbon and that any effort made in non-domestic does not bring any unintended consequences to domestic buildings.

We would be happy to discuss any of these issues further with the Department if this would be helpful and facilitate effective solutions.

If this letter is to be made available on the internet, please can you ensure that the signature does not appear.

Yours sincerely,

Dave Mitchell  
Technical Director

# 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](http://www.communities.gov.uk/publications/planningandbuilding/newnondomesticconsult)

<b>Name:</b> D F Mitchell	Please return by: <b>26 February 2010</b> Responses should preferably be submitted by email to: <a href="mailto:buildgreen@communities.gsi.gov.uk">buildgreen@communities.gsi.gov.uk</a>  Alternatively, hard copy responses should be sent to:  Clover Summers Sustainable Buildings Division Communities and Local Government Zone 5/G10 Eland House Bressenden Place London SW1E 5DU
<b>Role:</b> Technical Director	
<b>Organisation:</b> Home Builders Federation (HBF)	
<b>Address:</b> 1 <sup>st</sup> Floor Byron House, 7-9 St James's Street, London, SW1A 1EE	
<b>Telephone:</b> 020 7960 1600	
<b>Fax:</b> 020 7960 1601	

e-mail: dave.mitchell@hbf.co.uk

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.

HBF represents the views of its members who build around about 80% of the new homes built in England and Wales.

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** The response is not confidential but please ensure that no HBF staff signatures appear on websites etc.

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"/>
<b>Property management:</b>		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"/>	<b>Householder:</b>	
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/m<sup>2</sup>/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:** This is the correct metric to use which will align with the metric to be used on new homes. It is important to only use one metric and to that end it will be necessary to alter BREEAM.

### 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.** *If you do not agree with any of the three scenarios, please provide comments here, stating why and what you would prefer.* Scenario 2 preferred as it appears to be the same as the 2013 improvement being taken for new homes. This will show a consistent approach.

**There is more work required however to ensure that no sector is unfairly disadvantaged.**

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 issue of costs is a very sensitive one. Given that the Zero Carbon

Hub have done a lot of good work in this area for new homes it would seem logical to ask them to follow this work through to include non domestic. It is of major importance that the cost of implementation does not prevent or hinder future growth in the industry. This is also of major importance to house building.

## 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:** Yes - for consistency reasons.

The issues surrounding allowable solutions need to be resolved very quickly.

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

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

**Comment:** As mentioned in question 4 we need consistency between both sectors.

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

**Comment:** For consistency with house building, both sectors should be running to the same time table.

This is particularly important on large mixed use developments where a district heat and power scheme might be required.

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

**Comment:** It would seem appropriate. Need to be careful that this does not contradict any approach made in new homes.

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

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

**Comment:** 10 per cent. This is going to be a highly sensitive area so a gradual slow approach would be best.

## 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"/>
<b>Comment:</b>	

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"/>
<b>Comment:</b>	

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"/>
<b>Comment:</b> This will enable the sector to be in a better position to deliver allowable solutions with confidence.	

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

**Comment:** More in depth checking that standards required are achievable. A national consistent approach needs to be adopted by planners in ensuring that any targets they set are in line with national regulatory framework.

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:** Yes, it probably does. Although not covered by this consultation, the question still remains of how to deal with existing non domestic which will provide the bigger savings.

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:**