

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.	

TRADA, the Timber Research and Development Association was set up in 1934 to provide technical support in the use of timber in construction.

Its membership of approximately 1700 businesses is split into corporate or trade members and professionals, which includes architects, engineers, developers, universities etc.

The matter has been discussed with our board members but views have not been formally assembled.

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	✓
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	✓	Wales	<input type="checkbox"/>
England and Wales	<input type="checkbox"/>	Other	<input type="checkbox"/>

		(please specify)	
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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

We believe very strongly, based on logic alone, that there should be only one 'definition' for all govt policies sharing the use of the 'zero carbon' phrase. Anything else will cause complete confusion.

However, we do not agree that the overall proposed approach in this consultation is right for a number of important reasons.

What is being proposed is not in fact a zero carbon home because the allowable solutions element is too creative to still fit the intuitive meaning of the phrase. The average house buyer, if sold a 'zero carbon home' would understandably expect it to have zero energy bills, which is not the case. The Advertising Standards Authority will no doubt become involved if we pursue the proposed approach.

Essentially what is being proposed is low carbon homes with a tax to make up the difference that cannot be realistically achieved. We believe that we should aim for low carbon and be quite content with this as a challenging target.

'Low carbon' as a phrase has the benefits of:

- Being honest about what is being offered*
- Providing some much needed flexibility on what levels are set for different building types and locations*

We therefore strongly urge the government to scrap the notion of requiring all homes to be zero carbon and adopt the honest phrase of low carbon homes.

We acknowledge that high standards of energy efficiency are both achievable and cost justifiable. However providing full energy requirements on site are not achievable commercially. Taxing developers to make up the difference is neither justifiable nor necessary. Para 2.11 makes it clear that this proposed policy will only make a modest contribution to promoting renewables, yet it will probably have a devastating consequence for the housebuilding industry.

There are plenty of other much more appropriate policies in place to develop the renewable energy industry. It is perfectly realistic to continue encouraging the growth in the renewables industry without unnecessarily burdening the housebuilding industry.

New houses have to compete with existing houses. The vast majority of consumers are not going to pay huge extra costs for houses which have very long pay-back periods on the energy equipment, particularly when the

maintenance requirements are far more complicated and expensive than they are used to. The issue of economics for the home buyer and developer has not been considered in this proposal. Until they are properly considered we will achieve very little. Germany has addressed this issue by aiming for much more achievable standards and providing grants that cover the up front additional capital costs. Without this they will tell you that the PassivHaus standard would not have taken off. We ignore this vital issue at our peril.

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

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

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.

We suspect that many people will not pick up on the fact that whilst the energy requirements may be similar to the likes of PassivHaus, the overall suggested requirements are far in excess of any other standards.

Whilst we are fully supportive of setting heating and hot water standards at the proposed level, we do not agree with setting such high overall standards.

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**

We believe that a different approach is required all together in relation to the 'carbon' and 'allowable solutions' sections given in this proposal.

We strongly believe that policy should aim for the highest standards that are both commercially and technically achievable. Beyond this the policy is not justifiable.

We believe that a different mechanism is required in relation to using on site renewable technology. The goal should be that where it can be justified it is used. Otherwise it should not.

Renewable energy is usually only economic at medium or large scale and therefore should be handled by energy companies, with possible input from planning.

We propose that all issues regarding off site energy are removed from this policy altogether and handled separately by other policies. There is no justification for involving house builders / developers in off site energy production for all dwellings.

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?

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?

Some of the assumptions made will not be in place after 2010, which will alter the results given in appendix E.

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:

We need SAP2009 in place before this can be meaningfully decided.

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:

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)?

It will be necessary to set different fixed single numbers for different building types however. This is one strong reason for using the phrase 'low carbon' rather than 'zero carbon' since in practice different building types will be achieving different levels of performance.

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

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.

Whilst many of the suggested activities may help to some extent, these issues should not in our opinion be handled in this fashion. The problem is that we

are trying to force an almost utopian standard on all new houses. The proposal acknowledges that this cannot be achieved in many cases and therefore suggests various ways of trying to get around this problem. Some of these ways are nothing more than a 'green tax'. If there is to be a green tax why should new home buyers bear the brunt? We all acknowledge that new renewable energy production is needed and this should be created in the normal business manner, with the cost met across the whole of the supply and demand chain – not skewed heavily towards new building buyers.

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?

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.

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 :

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:

County level is probably required if people are to feel that the issue is local. Regional governments are not recognized by the public, probably because they have not voted for them.

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

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.

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:

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.

We do not believe that forcing a 'green tax' on developers to make up the difference between what is reasonable and cost justifiable is in any way appropriate.

If government wishes to genuinely encourage local on site solutions the capped amount will need to be roughly equivalent to the cost of installing solutions. If it is significantly cheaper developers will simply pay the capped amount assuming that the development is still commercially viable. The cost of fitting on site solutions would need to be the issue that defines the level of capped cost.

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.

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

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?

Yes No Do not know

Comments:

Consistency of approach is vital across the country.

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?

Yes No Do not know

Comments:

Consistency of approach is vital across the country.

If you have any further comments on Section 6 please add them here

Section 7: Costs and Benefits

Q25. Do you agree that the Impact Assessment broadly captures the types and levels of cost associated with the policy?

Yes **No** Do not know

If you do not agree, please say why not.

Q26. Do you agree that the Impact Assessment broadly captures the types and levels of benefits associated with the policy?

Yes **No** Do not know

If you do not agree, please say why not.

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?

It suffers from the same failings that are commented above in regard to domestic buildings.

What alternatives do you propose?

Set high achievable (technically and commercially) targets for each building type.

Accept that we cannot truly achieve zero carbon and therefore call it low carbon.

Incentivise the energy industry to deliver greener energy at medium and large scale over the coming years. Simpler more cost effective mechanisms are required than those in place and being prepared at present.

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:

The approach should be similar but we do not agree with the one proposed.

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

Clearly many non-domestic buildings are not going to achieve anything like self-sufficiency in energy production.

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

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

We do not agree with the hierarchy for homes or non-domestic.

*If you disagree, what alternative would you suggest and why?
Set high achievable (technically and commercially) targets for each building type.
Accept that we cannot truly achieve zero carbon and therefore call it low carbon.
Incentivise the energy industry to deliver greener energy at medium and large scale over the coming years.*

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?

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?

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: