

Next steps to zero carbon homes – Allowable Solutions

Consultation - Response Form

How to respond:

Please respond by email to: Building.Regulations@communities.gsi.gov.uk.

The closing date for responses is 5pm on 15/10/13.

About you:

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- (i) Are the views expressed on this consultation an official response from the organisation you represent or your own personal views?

Organisational response ☒

Personal views ☐

- (ii) Are the views expressed on this consultation in connection with your membership or support of any group? If yes please state name of group:

Yes ☐

No ☒

Name of group:

(iii) Please tick the *one* box which best describes you or your organisation:

Builders / Developers:		Property Management:	
Builder – Main contractor	<input type="checkbox"/>	Housing association (registered social landlord)	<input type="checkbox"/>
Builder – Small builder (extensions/repairs/maintenance, etc)	<input type="checkbox"/>	Residential landlord, private sector	<input type="checkbox"/>
Installer / specialist sub-contractor	<input type="checkbox"/>	Commercial	<input type="checkbox"/>
Commercial developer	<input type="checkbox"/>	Public sector	<input type="checkbox"/>
House builder	<input type="checkbox"/>	Building Control Bodies:	
Building Occupier:		Local authority – building control	<input type="checkbox"/>
Homeowner	<input type="checkbox"/>	Approved Inspector	<input type="checkbox"/>
Tenant (residential)	<input type="checkbox"/>	Specific Interest:	
Commercial building	<input type="checkbox"/>	Competent Person Scheme operator	<input type="checkbox"/>
Designers / Engineers / Surveyors:		National representative or trade body	<input type="checkbox"/>
Architect	<input type="checkbox"/>	Professional body or institution	<input type="checkbox"/>
Civil / Structural Engineer	<input type="checkbox"/>	Research / academic organisation	<input type="checkbox"/>
Building Services Engineer	<input type="checkbox"/>	Energy Sector	<input type="checkbox"/>
Surveyor	<input type="checkbox"/>	Fire and Rescue Authority	<input type="checkbox"/>
Manufacturer / Supply Chain	<input type="checkbox"/>	Other (please specify)	<input checked="" type="checkbox"/>
		London local government representative body	

(iv) Please tick the *one* box which best describes the size of your or your organisation's business?

Micro – typically 0 to 9 full-time or equivalent employees (incl. sole traders)

☐

Small – typically 10 to 49 full-time or equivalent employees

☐

Medium – typically 50 to 249 full-time or equivalent employees

☒

Large – typically 250+ full-time or equivalent employees

☐

None of the above (please specify)

☐

(v) Would you be happy for us to contact you again in relation to this consultation?

Yes

☒

No

☐

DCLG will process any personal information that you provide us with in accordance with the data protection principles in the Data Protection Act 1998. In particular, we shall protect all responses containing personal information by means of all appropriate technical security measures and ensure that they are only accessible to those with an operational need to see them. You should, however, be aware that as a public body, the Department is subject to the requirements of the Freedom of Information Act 2000, and may receive requests for all responses to this consultation. If such requests are received we shall take all steps to anonymise responses that we disclose, by stripping them of the specifically personal data - name and e-mail address - you supply in responding to this consultation. If, however, you consider that any of the responses that you provide to this survey would be likely to identify you irrespective of the removal of your overt personal data, then we should be grateful if you would indicate that, and the likely reasons, in your response, for example in the comments box.

Questions:

Please note: We very much welcome your views to help inform our decision on the way forward on standards. However, you are not obliged to answer every question. You can focus only on the sections that are most relevant to you.

Chapter 1: Fabric energy efficiency and carbon compliance

Question 1	Do you agree that the government should base its consideration for energy performance standards for 2016 on the fabric energy efficiency and carbon compliance standard recommended by the Zero Carbon Hub and endorsed by the government in May 2011?
Yes <input type="checkbox"/>	
No <input checked="" type="checkbox"/>	
Please give reasons for your answer: Developments across London and elsewhere are already meeting higher standards. As of 1 October 2013, in London, this will be a 40% improvement upon 2010 Building Regulations for domestic and non-domestic properties. While we support the proposed introduction of minimum on-site fabric energy efficiency and carbon compliance standards through a further uplift in Part L of the Building Regulations in line with those recommended by the Zero Carbon Hub, local planning authorities should retain the ability to require higher levels of on-site performance through local planning policies according to local priorities. There may also be a strong justification for going beyond minimum on-site carbon compliance standards for particular developments – for example where opportunities for decentralised energy have been demonstrated, or where a zero- or low-carbon heat network is planned.	

Question 2	Do you have evidence, including data on costs, which you can make available to DCLG and could be used in reviewing the assumptions underpinning the Fabric Energy Efficiency and Carbon Compliance standards?
Comments:	

For London, the Greater London Authority (GLA) has evidence as to what is deliverable beyond these levels, based on energy policies delivered under the London Plan.
http://www.london.gov.uk/sites/default/files/monitoring_impact_london_plan_energy_policies.pdf

Chapter 2: Design principles for Allowable Solutions

Question 3	Do you agree with these design principles for Allowable Solutions set out in paragraph 2.4 (a to e) of the consultation document?
Agree with all <input type="checkbox"/>	
Disagree with:	
a <input checked="" type="checkbox"/> b <input checked="" type="checkbox"/> c <input type="checkbox"/> d <input checked="" type="checkbox"/> e <input type="checkbox"/>	
<p>Please provide reasons why you disagree with any of the design principles</p> <p>a) and b) We generally support the principle that developers should have some degree of choice and flexibility over the Allowable Solution measures they can undertake to meet their obligations. However, there should be prioritisation of local carbon-reduction projects. It is vital that investment in carbon-reduction projects funded through Allowable Solutions should be directed as far as possible towards the communities that have accommodated new housing development in their areas. This approach would still facilitate choice and flexibility, but will maintain the link that exists in planning between the impacts arising in a local area and their amelioration.</p> <p>d) There are already mechanisms in place within the planning process to check for development viability. Focusing only on the most cost-effective opportunities available could undermine the legitimacy of Allowable Solutions as it would mean that, in urban areas such as London, Allowable Solutions funds would tend to be spent outside the local area, where delivery costs are likely to be lower.</p> <p>From the information provided in the consultation document, it seems unlikely that the proposed carbon price caps (set out in Chapter 5) will be high enough to make the sorts of measures the government proposes in Paragraph 4.18 viable. For example, under the Energy Companies Obligation it is anticipated that there needs to be a rate of £180/tCO₂ to fund external wall insulation. The cost of delivering decentralised energy is also very high compared to basic domestic retrofit measures and it is unlikely that the Allowable Solutions scheme as proposed would deliver any support for this kind of scheme – and certainly not within London.</p>	

Question 4	Are there other design principles which you think that the government should consider? Please provide an explanation for any other design principles suggested
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Comments:

Yes.

Investment in carbon reduction measures/ projects funded through Allowable Solutions should be directed towards the locality of the proposed development wherever possible – in line with locally determined priorities and deliver demonstrable benefits for local communities accommodating housing growth. This would ensure the proposals are in line with the Localism Act.

Time-limited installation of offset measures would ensure that there isn't a significant delay between the carbon emissions being generated and being offset.

Question 5	Do you agree that house builders should have a variety of routes, as set out in paragraph 2.7 of the consultation document, to meet their zero carbon homes obligations?
Yes <input type="checkbox"/>	
No <input checked="" type="checkbox"/>	
Comments: Agree that house builders should have a variety of routes, but disagree with some of the design principles underpinning paragraph 2.7 (as set out under Question 3 above) and some of the specific routes (as set out below).	

Question 6	Do you agree or disagree with any of the routes ((i) to (iv)) identified in paragraph 2.7 of the consultation document and do you have other routes to suggest.
Agree with all <input type="checkbox"/>	
Disagree with: route (i) <input type="checkbox"/> route (ii) <input checked="" type="checkbox"/> route (iii) <input checked="" type="checkbox"/> route (iv) <input type="checkbox"/>	
Suggested other route(s) and reasons: Option (ii) has the potential to be complicated if additional measures are added to the specifications of buildings that already have planning	

permission. Trying to identify additionality will be difficult in practice to manage and will make the planning process more bureaucratic and will require further time and money to be spent.

Option (iii) could be acceptable if, as outlined under the additional principles above, the measures are delivered within the local area. Housebuilders should be obliged to use the local authority carbon abatement service where one has been established before contracting with a private third-party Allowable Solutions provider. Local authorities are in the best position to deliver carbon reduction schemes that contribute towards the delivery of local priorities, and they already have a strategic role in promoting local low carbon energy schemes and supporting/ promoting retrofit projects.

No consideration is given to who the private sector providers would be. We would like clarification on this.

Option (iv) should be a last resort and only then if a localised, or at least regionalised, fund is created. Unless this happens London will pay, but not benefit. Any funds held on a London-wide basis should be ring-fenced to the borough in which the developments were located.

Question 7	(For house builders) How likely are you to use any of the routes identified in paragraph 2.7 of the consultation document? Please complete the table below
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Route	Very likely	Occasionally	Unlikely
(i) Doing more onsite	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(ii) Delivering off-site through own actions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iii) Contracting with a third party	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iv) Payment into a fund	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Please add any comments about your reasons. 			

Question 8	Do you think the current market could scale up to meet additional demand for carbon abatement?
Yes <input type="checkbox"/>	
No <input type="checkbox"/>	
Comments: No comment.	

Chapter 3: Other delivery options considered

Question 9	Do you agree that the government should set out a national policy framework for Allowable Solutions and not leave it to local authorities to decide locally?
Yes <input type="checkbox"/>	
No <input checked="" type="checkbox"/>	
<p>Please give reasons for your answer.</p> <p>The government can set a national framework that still allows for the policy to be applied in a way that has due regard to the specific local circumstances (e.g. land values, build costs and sale values).</p> <p>As they currently stand, the proposals contravene the Localism Act principles, which are focused upon more closely aligning local priorities with the standards of new developments. They also remove the link between the local area and the benefits that accrue to it as a result of the new development coming forward.</p> <p>Local authorities are bound by viability constraints, and so any cost that is set would fit within the local financial constraints and would not act as a brake upon development.</p> <p>Communities in the local authority area are more likely to view developments favourably if they can see the full range of impacts is being mitigated within their local authority area and the benefits accrue to their area. If communities see that Allowable Solutions payments are leaving the borough, they may be less willing to accept any real or perceived negative impacts arising from the proposals. This will impact upon development viability and may act as a constraint upon developments.</p>	
Question 10	Do you agree that a mandated local approach to the delivery Allowable Solutions has no role in this national policy for the reasons set out in paragraphs 3.13 to 3.18 of the consultation document?
Yes <input checked="" type="checkbox"/>	

No ☐

Please give reasons for your answer.

Partially agree. While we agree that local authorities should not be compelled to introduce a scheme according to a 'mandated local approach', there should be an option for Allowable Solutions to be funded and supplied at the local level where a local authority wishes this. For example, as noted above, housebuilders should be required to use the local authority carbon abatement service where one has been established before contracting with a private third-party Allowable Solutions provider.

Chapter 4: Allowable Solutions measures and verification

Question 11	Should Allowable Solutions be concentrated on particular types of measure?
Yes <input type="checkbox"/>	
No <input type="checkbox"/>	
Please give reasons for your answer No comment.	

Question 12	Do you think that Allowable Solutions should be confined to only to measures in the non traded sector of the economy?
Yes <input type="checkbox"/>	
No <input type="checkbox"/>	
Please give reasons for your answer No comment.	

Question 13	Should measures in the traded sector be supported by Allowable Solutions, provided that they meet the appropriate criteria?
Yes <input type="checkbox"/>	
No <input type="checkbox"/>	
Please give reasons for your answer No comment.	

Question 14	Do you think that Allowable Solutions should be confined to measures in the built environment?
Yes <input type="checkbox"/>	
No <input type="checkbox"/>	
Please give reasons for your answer No comment.	

Question 15	Do you think that measures should just be confined to residential buildings or should also cover non domestic buildings?
Residential buildings only <input type="checkbox"/>	
Residential and non domestic buildings <input checked="" type="checkbox"/>	
<p>Please give reasons for your answer</p> <p>To allow for measures such as decentralised energy to be included which, given their size, are likely to include non-domestic properties. Also, local community buildings, such as schools, church halls and libraries, could be targeted early on to act as beacons for the community to raise awareness and education about energy savings.</p> <p>Given the longer term proposal for zero carbon non-residential properties from 2019, developing the scheme so as to allow for the integration of non-residential Allowable Solutions into the scheme will offer more certainty for developers.</p>	

Question 16	Do you think that there should be any spatial limitations on Allowable Solutions?
Yes <input checked="" type="checkbox"/>	
No <input type="checkbox"/>	
<p>Please give reasons for your answer</p> <p>As discussed above, Allowable Solutions should be delivered in the locality of the development. If the last resort option of paying into an Allowable Solutions fund is used, this should be a London-wide rather than national fund to ensure London benefits from its fair share of Allowable Solutions funding in line with the level of new development that takes place in London.</p>	
If yes, do you think that Allowable Solutions should be limited to projects located in:	
(a)	the locality of the development <input checked="" type="checkbox"/>
(b)	England <input type="checkbox"/>
(c)	United Kingdom <input type="checkbox"/>

Please give reasons for your answer.

See above.

Question 17	Do you consider that the five criteria set out in paragraph 4.17 of the consultation document are appropriate to determine Allowable Solutions' measures?
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Yes ☐

No ☒

Please give reasons for your answer

The spatial criteria should be narrowed to ensure projects must be located in the locality of the development, as explained above.

Market additionality. It will be difficult to define additionality and risks making the scheme unnecessarily bureaucratic to deliver in practice. The risks around the scheme may also serve to unnecessarily increase the cost of the measures.

Cost effectiveness. A ceiling price doesn't in and of itself guarantee competition and cost effectiveness. A ceiling price may serve to artificially inflate the cost of carbon for some measures, particularly those which have a high level of carbon reduction proportional to the cost of the measures – e.g. loft and cavity wall insulation. As the final few months of the Carbon Emissions Reduction Target demonstrated, the increase in the cost of carbon didn't translate into a significantly higher number of harder to treat measures being installed, just a higher amount of funding for standard measures such as loft and cavity wall insulation. A floor price would ensure a minimum amount of carbon reduction measures can be delivered whilst driving innovation and competition by forcing Allowable Solutions to be delivered at as cost effective a price as possible.

Question 18	Are there other criteria you consider should be used?
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Yes ☒

No ☐

Please give reasons for your answer

Community benefits. Proposals that improve community assets in the local authority area development is taking place in, and/or help to deliver benefits to the community in the local authority area more generally should be considered as more appropriate because of the wider benefits the development brings such as grid resilience, air pollution mitigation etc.

Timeframe for delivery. Putting a limit on the amount of time between the development being built and the Allowable Solutions measures being installed to minimise the amount of time where carbon emissions are not being offset.

Question 19	Do you have evidence that you are willing to share with DCLG about the likely supply of Allowable Solutions' measures?
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Comments:

A number of local authorities, at the request of the local population, have produced evidence-based studies to inform carbon offsetting that could be shared with DCLG. In London (e.g. Westminster, Islington, Sutton, Lewisham and Waltham Forest) and elsewhere (e.g. Milton Keynes Brighton, Southampton, Reigate and Bandstand, Cambridgeshire, Cambridge, Aylesbury Vale, Thurrock, Oxfordshire County Council, Stockport and Manchester), also public sector bodies such as the Olympic Legacy Agency have already done this and many more are already working on collecting offsetting funds and delivering projects to save carbon.

Question 20	Do you agree that the verification system for Allowable Solutions should include arrangements for deeming savings as a form of ex ante verification?
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Yes ☒

No ☐

Please give reasons for your answer

Both ex ante and ex post are viable ways of delivering Allowable Solutions.

Question 21	Do you have views on how such a system might best operate?
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Comments:

It could be based on the standardised approach adopted for the Green Deal and ECO.

Question 22	Do you agree that the verification system for Allowable Solutions should include arrangements for ex post verification?
Yes <input type="checkbox"/>	
No <input type="checkbox"/>	
Please give reasons for your answer No comment.	

Question 23	Do you have views on how such a system might best operate to provide the best balance of assurance while avoiding overly burdensome reporting and monitoring processes?
Comments: No comment.	

Question 24	Should there be sanctions for non delivery of the expected carbon savings for Allowable Solutions' measures?
Yes <input type="checkbox"/>	
No <input type="checkbox"/>	
If Yes, how should those sanctions operate? No comment.	

Chapter 5: Price cap

Question 25 Please provide your view on whether the government should:

(a) allow the market to set its own price? Or ☐

(b) set a single fixed price? Or ☐

(c) set a ceiling price but enabling Allowable Solutions to be brought forward at lower prices? Or ☐

(d) set a floor price for Allowable Solutions? ☒

(tick one box above only)

Comments:

We believe that the options should be developed further. One option could be that a floor price is set, which could be a national price if local authorities did not want to deliver a local allowable solutions scheme. There may be some value in also setting a ceiling price, but rather than setting a fixed maximum capped price, we would advocate setting a cap based on a set proportion of the average local property sales price. However, setting a single national ceiling price together with no mechanism for prioritising local projects would inevitably result in almost all of the Allowable Solutions being implemented outside of London in parts of the country where more cost-effective measures are available.

Question 26 Which price do you think should be adopted and why?

low ☐

central ☐

high ☐

Comments:

We disagree with the price caps proposed as none of the three would be sufficient to enable delivery of carbon reduction projects within London. Many urban authorities, including the London boroughs, have land restriction, and a diverse and complicated existing built environment that would promote local offsetting. Instead we would advocate setting a cap based on a set proportion of the average local property sales price.

We would like clarification on how the proposed cost of carbon was derived as it seems to be out of date. We recommend that DCLG uses the same figures as DECC in its carbon work.

Question 27	What impact do you think the different price caps will have on the extent to which Allowable Solutions projects will be brought forward?
Comments: <p>The proposed price caps would lead to the majority of allowable solutions funding being spent outside of London, despite the fact that a large proportion of all new housing is built in London. London Councils' work on the Carbon Emissions Reduction Target (CERT) indicates that London does not receive a fair share of the funding available nationally to support retrofitting work. This needs to be addressed by the Allowable Solutions proposals, not reinforced by them.</p>	

Question 28	What impact do you consider the different price caps will have on the viability of house building and would the impact differ in different parts of England?
Comments: <p>A higher price cap will be viable in London.</p>	

Question 29	Is 3 years an appropriate interval to review the price cap?
Yes <input type="checkbox"/>	
No <input type="checkbox"/>	
If no, how often do you think it should be reviewed? <p>No comment</p>	

Question 30	Should Allowable Solutions cover 30 years of residual emissions?
Yes <input type="checkbox"/>	
No <input type="checkbox"/>	
If no, how often do you think it should be reviewed? <p>No comment.</p>	

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Question 31	Do you think the calculation of the carbon abatement required should take account of the expected and actual decarbonisation of the electricity grid?
Yes <input type="checkbox"/>	
No <input checked="" type="checkbox"/>	
Please give reasons for your answer	
Policy is too uncertain in this area for any realistic assumptions to be made about the nature of grid decarbonisation.	

Chapter 6: Allowable Solutions delivery routes

Question 32	Do you agree that route (i) of the house builder 'menu' can be accommodated within current Building Regulations compliance processes?
Yes <input checked="" type="checkbox"/>	
No <input type="checkbox"/>	
Please give reasons for your answer	

Question 33	What kinds of Allowable Solutions measures undertaken under route (ii) of the house builder 'menu' do you consider could be accommodated within current Building Regulations compliance processes?
Comments: Boroughs do not support this route for a number of reasons including that it will offer no additionality, it will encourage developers to build to the lowest possible standards and it will add complexity in terms of the verification process.	

Question 34	Do you think that house builders should be able to enter into a direct transaction with third parties, including local authorities, to deliver Allowable Solutions?
Yes <input checked="" type="checkbox"/>	
No <input type="checkbox"/>	
Please give reasons for your answer Funding should be tied to the local authority area where the development is happening and therefore local authorities should be able to get involved in the process. Should local authorities choose not to deliver Allowable Solutions measures, either for a particular development or at all, the developer would need to	

find another delivery agent to do so in the local area.

Question 35	How might that approach operate?
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Comments: No comment.

Question 36	Do you have any evidence of how such a system might work which could be drawn upon in developing such an arrangement?
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Comments: No comment.

Question 37	Do you agree that provision of a matching service should be considered?
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Yes <input type="checkbox"/>

No <input type="checkbox"/>

Please give reasons for your answer: No comment.
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Question 38	Do you have views on how such a system might work to assist house builders?
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Comments: No comment.

Question 39	Do you have any evidence of existing matching services which could be drawn on in developing such an arrangement?
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Comments: No comment.	

Question 40	Do you agree that provision of a brokerage service should be considered?
Yes <input type="checkbox"/>	
No <input type="checkbox"/>	
Please give reasons for your answer Brokerage/ matching schemes are problematic, as is being seen through ECO due to high levels of complexity and management required, and associated high costs.	

Question 41	Do you have views on how such a system might work to assist house builders?
Comments: No comment.	

Question 42	Do you have any evidence of existing brokerage services which could be drawn on in developing such an arrangement?
Comments: No comment.	

Question 43	Do you agree that provision of a fund approach should be considered?
Yes <input checked="" type="checkbox"/>	

No ☐

Please give reasons for your answer:

Agree, but only on the basis that this is a last resort and is established regionally (i.e. London-wide). A national fund has significant issues highlighted above – in particular it removes the link between the impacts of a development and their mitigation.

Question 44	Do you have views on how such a system might work to assist house builders?
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Comments:

Setting different ceiling prices in different parts of the country, as suggested above under Question 26, in order to take into account differences in sale prices/ land values (i.e. setting higher price in London than elsewhere) and the costs of implementing Allowable Solutions (generally more expensive in London).

Question 45	Do you have any evidence of existing funds which could be drawn on in developing such an arrangement?
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Comments:

No.

Question 46	If invested in a fund, Allowable Solutions payment capital and profits can both be reinvested on a revolving fund basis to increase long-term potential carbon savings. However, commercial returns and/or capital could be given back to house builders rather than reinvested, but this would mean less carbon being abated and hence a higher upfront investment would be required to meet the house builder's zero carbon homes obligation.
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Is there any interest from house builders in investing into a fund which abates carbon and also makes a return rather than making a smaller one-off payment?

Yes ☐

No ☐

Comments:

The government should clarify how allowable solutions will work with funding arising from other government carbon policies (FITs, RHIs, ECO, etc.).

Question 47

What are your views on the assessment of the delivery options set out in the table below paragraph 6.19 of the consultation document?

Comments:

Some factors have not been addressed including localism and the fact that there is no incentive for local communities to welcome developments into their area if the benefits will be felt outside of that area, State Aid rules, EU competition and tax implications. The assessment also does not consider the local authority as an Allowable Solutions provider.

Question 48

Are there other considerations which government should be taking into account?

Comments:

Localism – the extent to which the mechanism supports the local authority area in which development is taking place.

Other benefits to the community such as air quality, health and quality of life improvements, employment, improvement/installation of community resources.

Grid resilience – the extent to which the proposal is more or less likely to reduce energy demand, increase the generation of energy and therefore increase grid resilience in the local authority area where developments are taking place

Fuel Poverty – the extent to which it addresses fuel poverty issues within the local authority where development is taking place.

The government should clarify how allowable solutions will work with funding arising from other government carbon policies (FITs, RHIs, ECO, etc.).

Question 49	<p>In the light of this analysis what is your preferred delivery route?</p> <p>house builder DIY <input type="checkbox"/></p> <p>bilateral <input type="checkbox"/></p> <p>matching / brokerage <input type="checkbox"/></p> <p>fund <input type="checkbox"/></p> <p><i>(tick one box above only)</i></p>
<p>Please provide reasons for your answer.</p> <p>No comment.</p>	

Chapter 7: Next steps

Question 50	What do you think an appropriate familiarisation period might be for industry and appropriate transition arrangements for Allowable Solutions?
Please provide reasons for your answer.	

Question 51	A development stage impact assessment accompanies this consultation document. Do you have any views on the analysis, costs and benefits presented in that impact assessment? Can you provide any additional evidence to inform the further development of the impact assessment?
Comments: The impact assessment doesn't consider any of the range of impacts which arise as a result of not requiring Allowable Solutions to be delivered within the local authority area where development is taking place as set out above under Question 48.	