

# Routes for Nearly Zero Energy

## Cardiff

### 10<sup>th</sup> March 2015

**Milica Kitson**  
**Chief Executive**  
**Constructing Excellence in Wales**

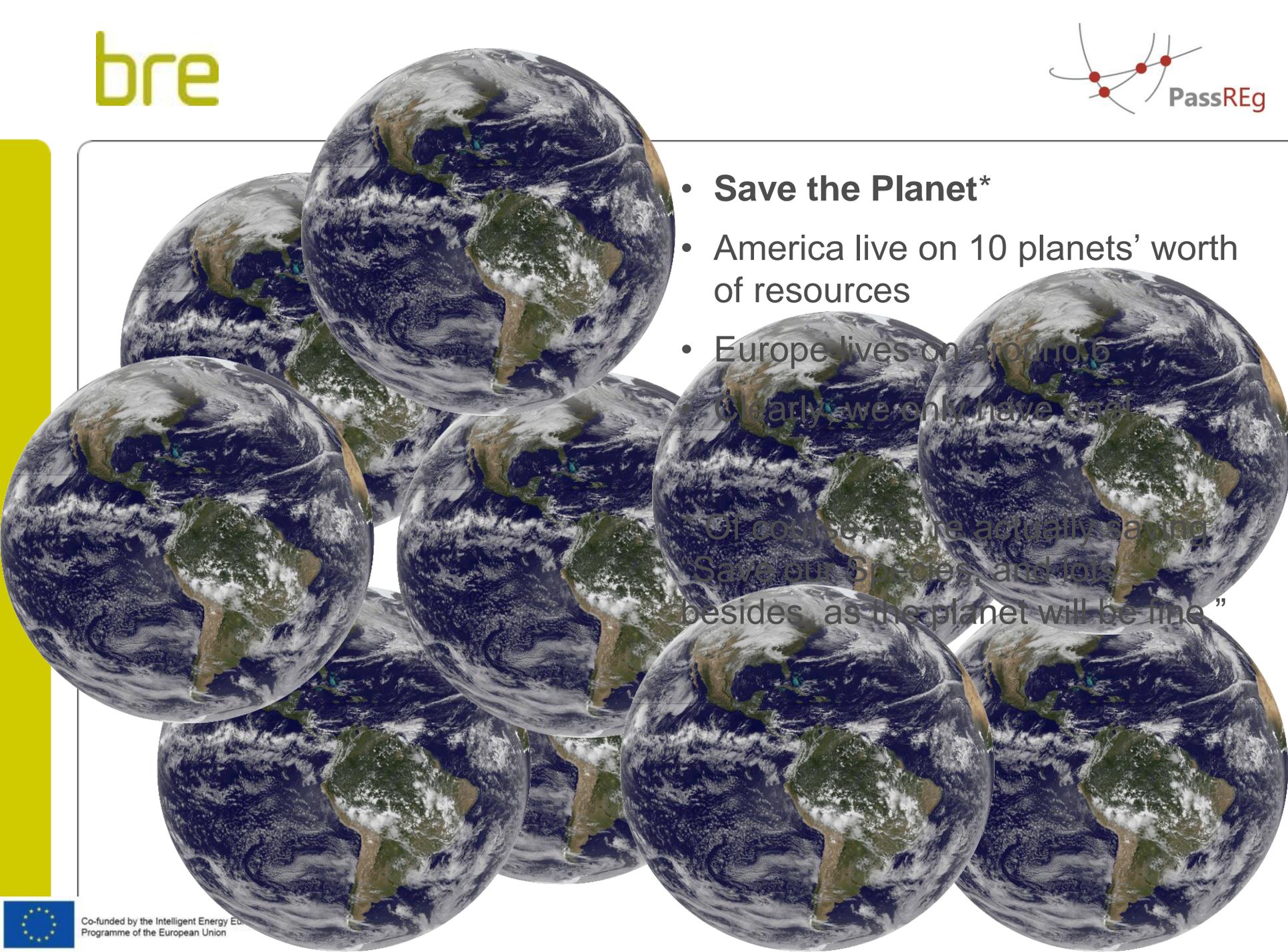
## PassREg Project

# Routes for Nearly Zero Energy

**Andrew Sutton** RIBA  
Associate Director, BRE  
Building Regulations Advisory Committee (Wales),  
Wales Low/Zero Carbon Hub  
Past President, Royal Society of Architects in Wales

Part of the BRE Trust



- 
- **Save the Planet\***
  - America live on 10 planets' worth of resources
  - Europe lives on around 6

Clearly, we only have one

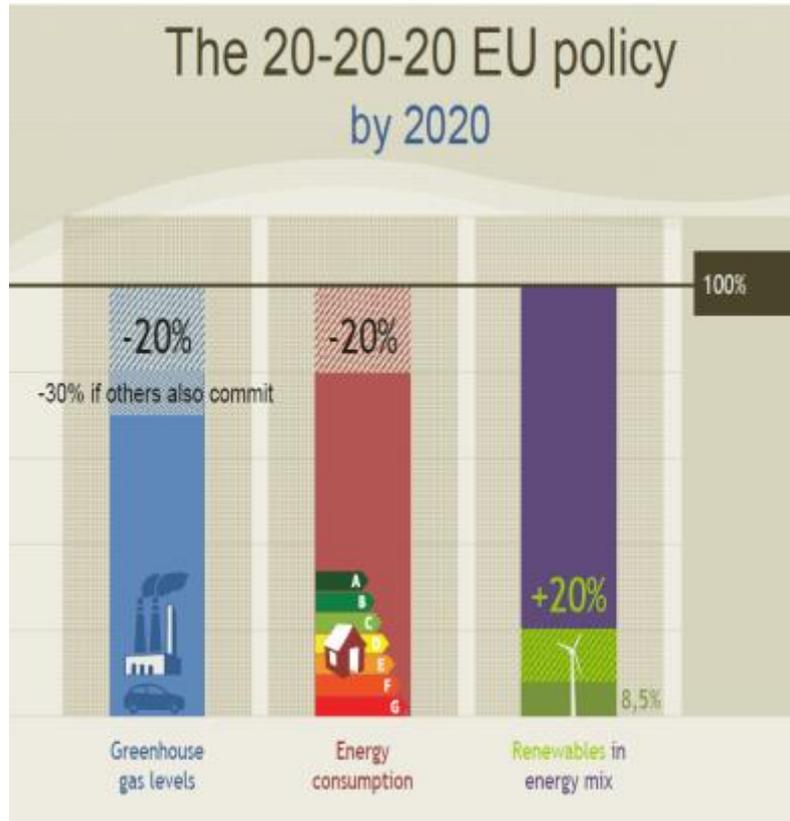
Of course, we're actually saying "Save our Species, and lots besides, as the planet will be fine."



- Ignore the planet, **it's the Law!**
- UK Legislation:  
Climate Change Act (2008)
- 80% reduction in Carbon emissions compared to 1990 levels
- Applies across the whole of UK, including construction sector



- Ignore Law, **keep the Lights on!**
- Oil & Gas peaked in 2010
- Coal peaked before that
- Nuclear peaks in 2020
- Plus mostly imported – currently 40% Middle East, 40% Russia



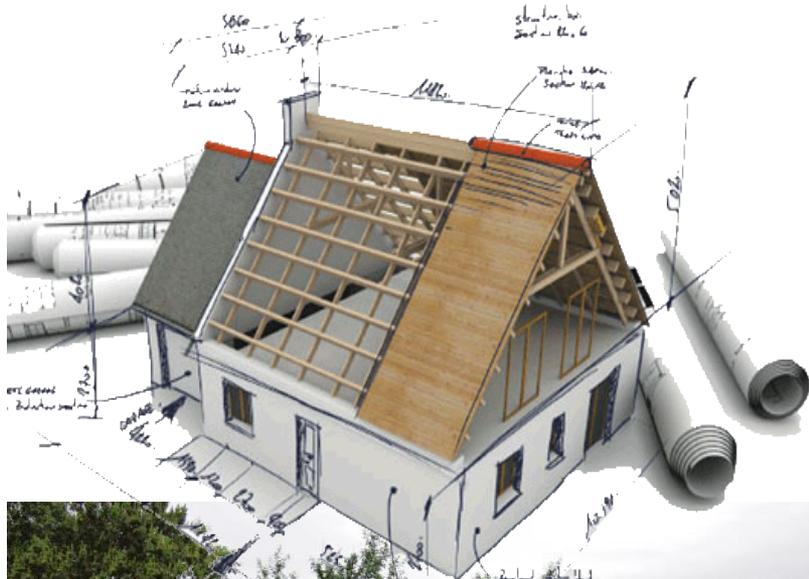
- EU Response: **20-20-20 Policy**
- Underpins many decisions
- 20% reduction in CO<sub>2</sub> levels
- 20% reduction in consumption
- 20% increase in renewables
- To be achieved by 2020



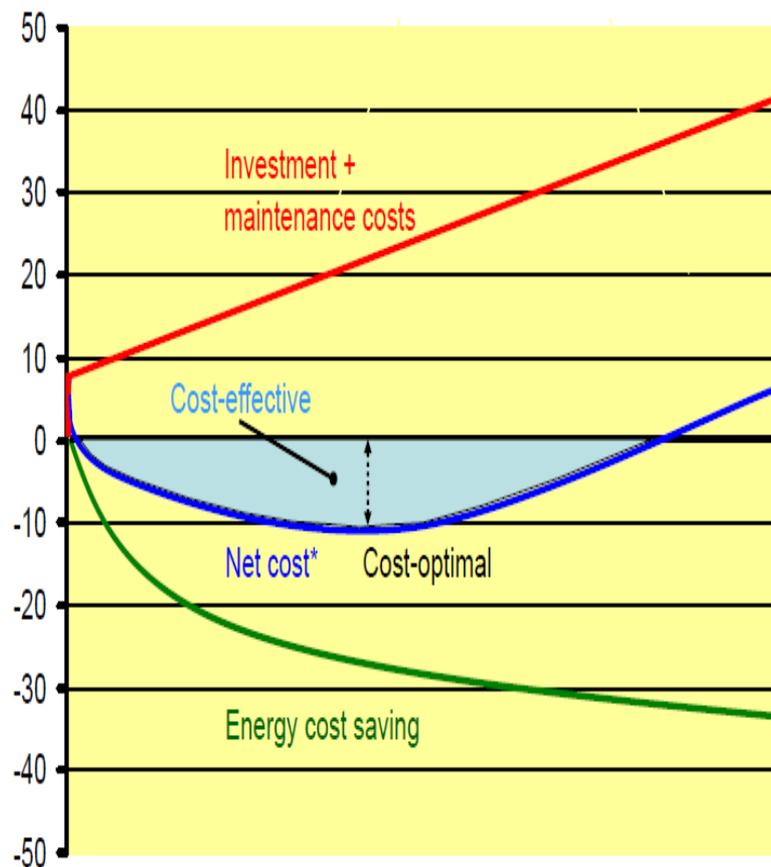






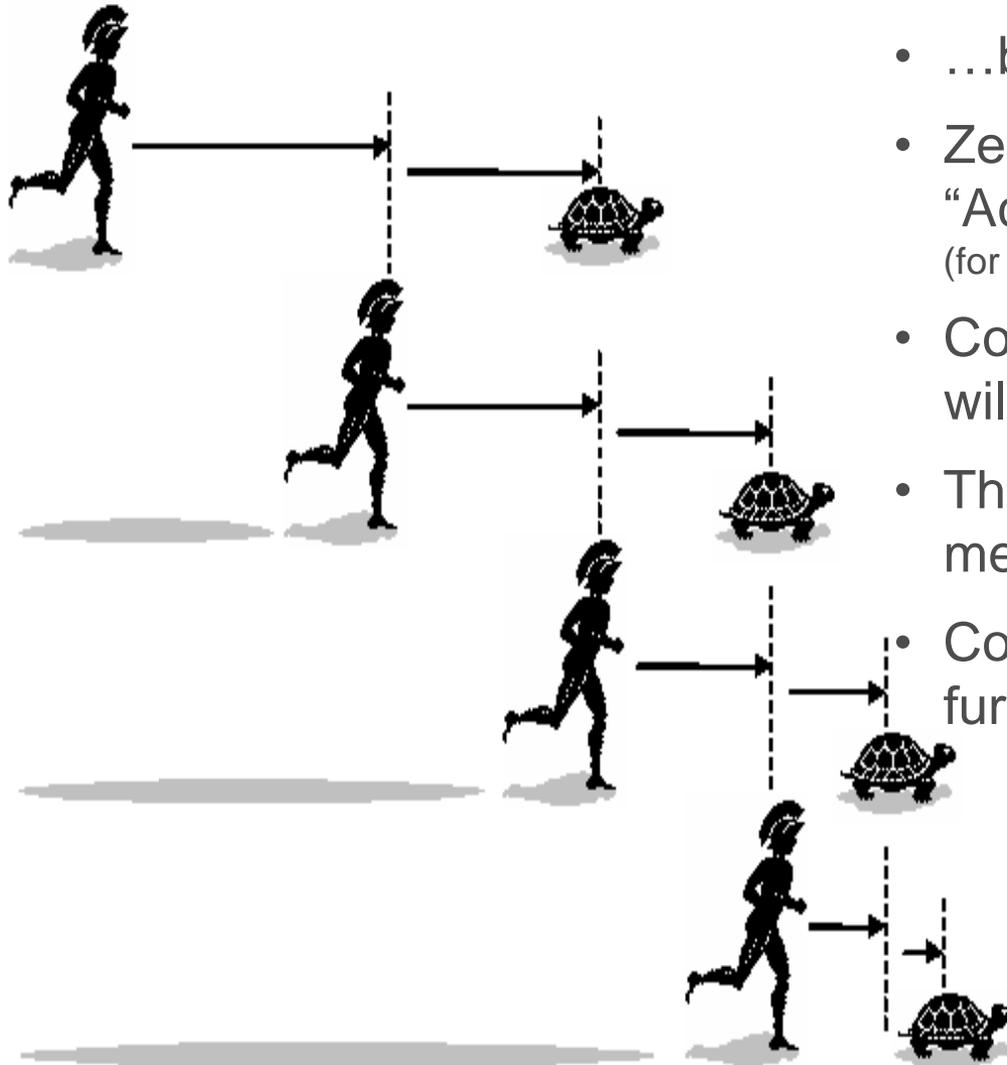


- Possible that **EPBD**, or **UK** interpretation may try to address the actual performance, not just the designed performance
- So what we actually build, not what we say we've built.

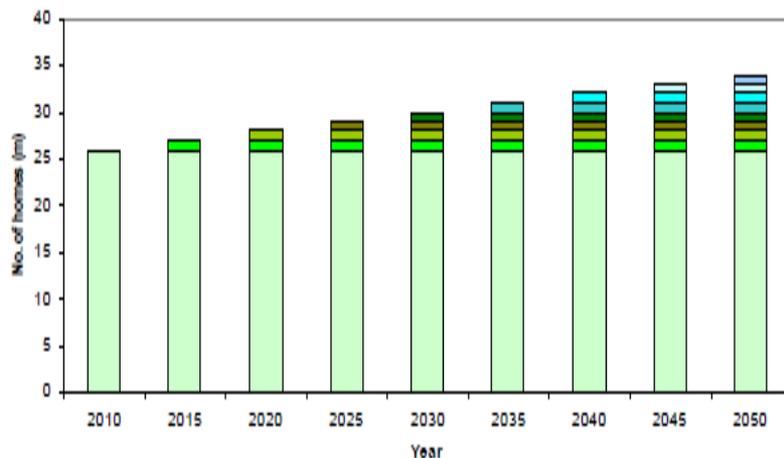


**Simplified Cost / Time  
for “Cost Optimal”**

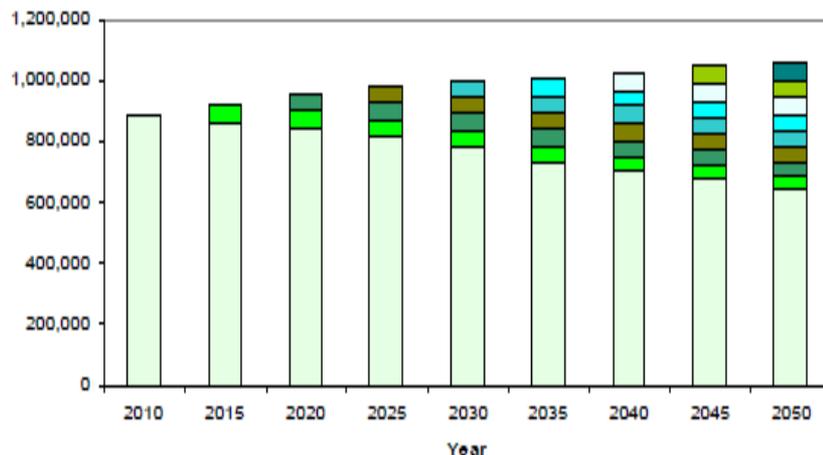
- **EPBD** says all this must be done in a “**Cost Optimal**” fashion...
- That’s not just Capital Cost; that’s lifecycle cost, including:
  - Investment
  - Maintenance
  - Operation
  - Energy (inc. energy sales)
  - Disposal
- Nations that have more than a 15% gap between standards and cost optimal will be challenged
- But that’s not all...



- ...because **Cost Optimal** is tricky!
- Zeno's paradox -  
“Achilles & the Tortoise”  
(for the Greek literati in the audience!)
- Cost Optimal for nZEB currently will be set in Building Regs.
- The Industry will (should!) improve methods to achieve this target
- Cost Optimal will then move a little further ahead of us...



### Domestic building rate



### Non-Domestic building rate

- But isn't the real problem the existing stock?
- **EPBD** applies to refurbishment, so **UK Regs** will have to as well
- “Major Renovation” is defined as 25% of surface or of value
- Includes technical systems as well as building elements
- Caveated by “*technically, functionally and economically feasible*”  
(but you can bet this will be tied to Cost Optimal, not capital price!)

18.6.2010 EN Official Journal of the European Union L 153/13

**DIRECTIVE 2010/31/EU OF THE EUROPEAN PARLIAM AND OF THE COUNCIL of 19 May 2010 on the energy performance of buildings (recast)**

THE EUROPEAN PARLIAM AND THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union, and in particular Article 194(2) thereof,

Having regard to the proposal from the European Commission,

Having regard to the opinion of the European Economic and Social Committee<sup>(1)</sup>,

Having regard to the opinion of the Committee of the Regions<sup>(2)</sup>,

Acting in accordance with the ordinary legislative procedure<sup>(3)</sup>,

Whereas:

(1) Directive 2002/91/EC of the European Parliament and of the Council of 16 December 2002 on the energy performance of buildings (EPBD) has been amended several times. Since further improvements are needed, it should be replaced by a new Directive.

(2) An efficient, primary energy supply and solid fuels, and also the leading energy sources.

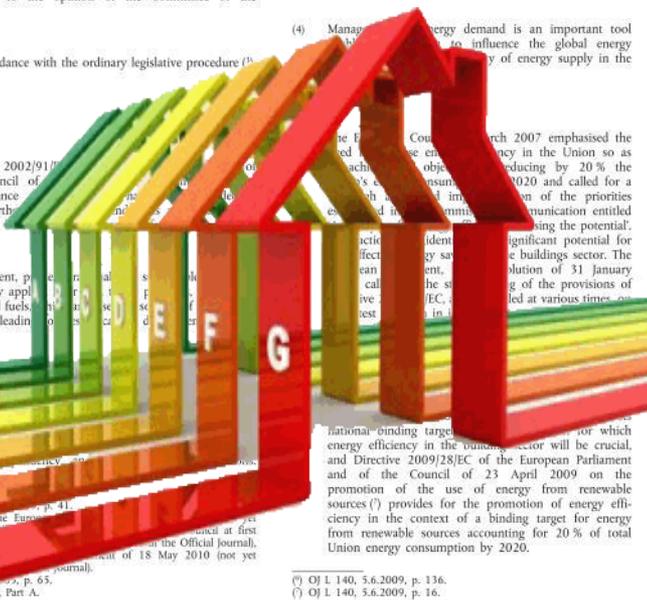
(3) The European Council in March 2007 emphasised the need to improve energy efficiency in the Union so as to reach the objective of reducing by 20% the Union's energy consumption by 2020 and called for a comprehensive approach to the implementation of the priorities of the communication entitled 'Energy Efficiency: Realising the potential'. This communication identified a significant potential for energy savings in the buildings sector. The Commission's communication of 31 January 2008 on the implementation of the provisions of Directive 2002/91/EC, as amended, called for various measures to be taken in order to achieve the target.

(4) Managing energy demand is an important tool to influence the global energy supply in the context of energy efficiency.

national binding target for which energy efficiency in the building sector will be crucial, and Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources<sup>(4)</sup> provides for the promotion of energy efficiency in the context of a binding target for energy from renewable sources accounting for 20% of total Union energy consumption by 2020.

<sup>(1)</sup> OJ L 140, 5.6.2009, p. 136.  
<sup>(2)</sup> OJ L 140, 5.6.2009, p. 16.

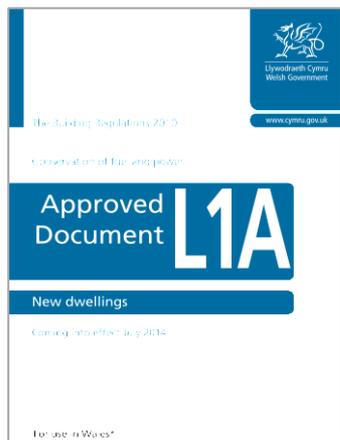
- **EPBD;**
  - Nearly Zero Energy
  - New & major refurbishment
  - Remaining energy low carbon
  - Cost Optimal method
- **by End of 2020**  
(or 2018 for public)



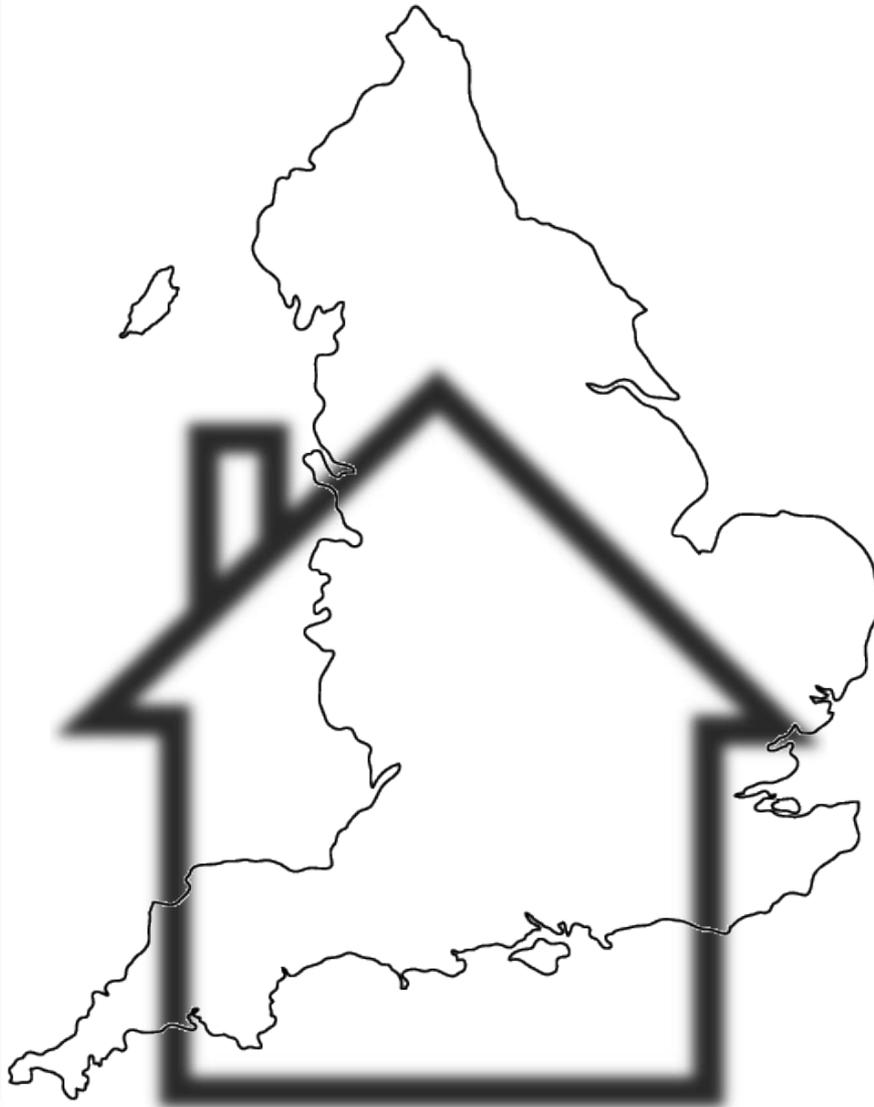
## “Zero” Carbon



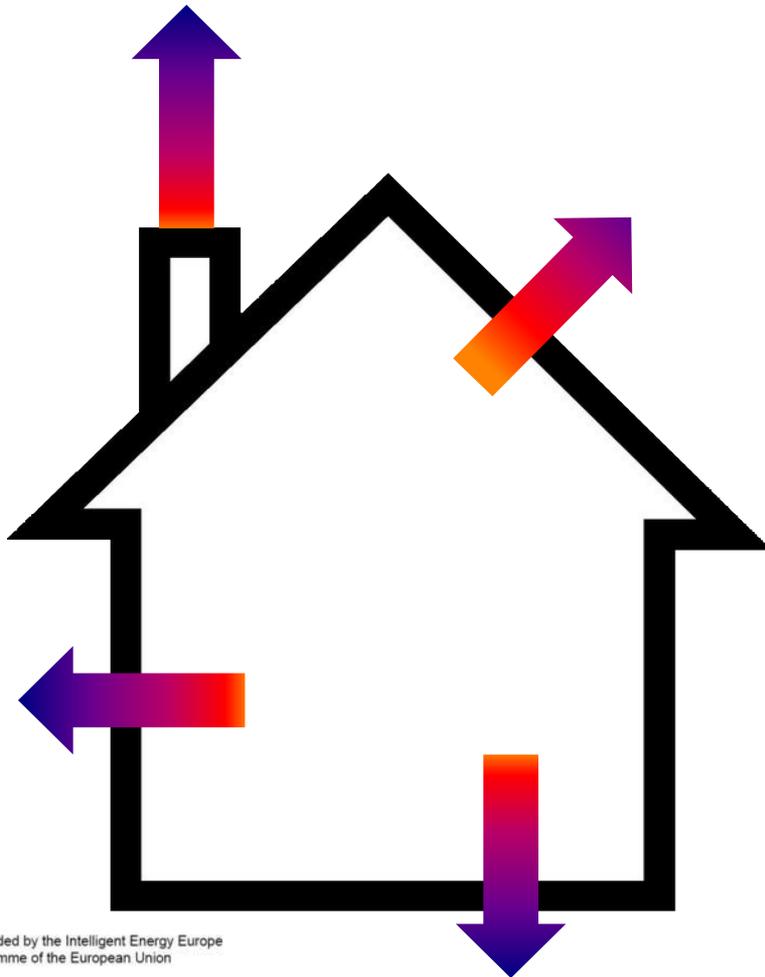
- How far have we got so far?
- “Zero Carbon” is not nZEB, but is roughly the goal with “significant renewables” requirement in EPBD
- 2002 improved around 10-15%
- 2006 improved c.25%
- 2010 improved c.25%
- Zero Carbon redefined to exclude unregulated energy
- 2014 improved c.9%



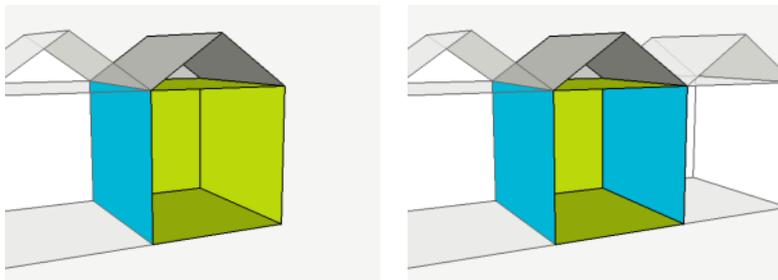
- **What next?**
- Wales has not yet set Standards to map out nZEB delivery
- Obligated to use SAP/SBEM tools
- Dropped TAN22 requirements, looking to deliver in Regs
- Some current topics that may be considered:
  - Performance Gap
  - Integrated Design



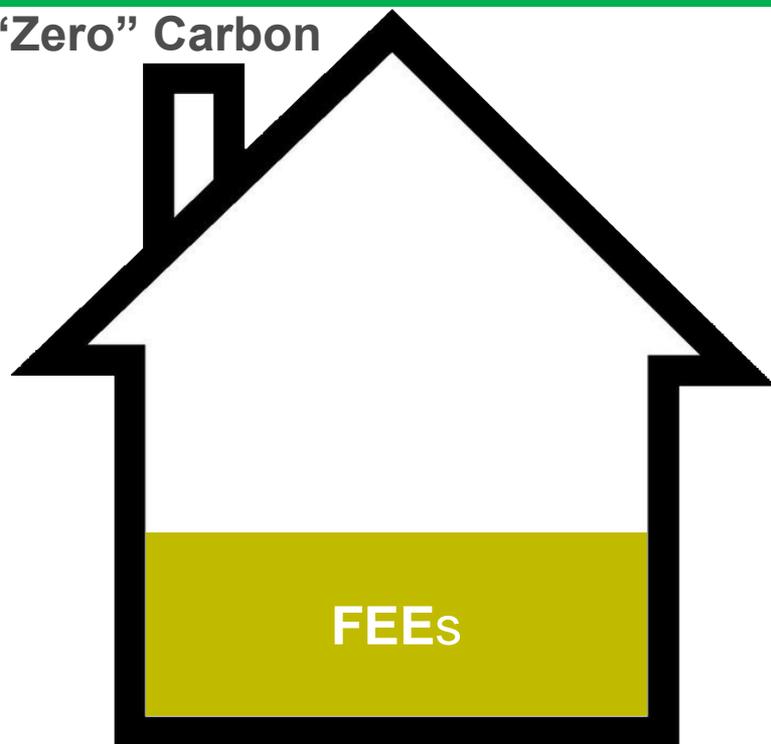
- **What is England doing?**
- **Domestic first** (*slightly clearer!*)
- Intending to deliver “Zero Carbon” by 2016 (although the redefined version)
- Broken into 3 steps:
  - Fabric Energy Efficiency
  - Carbon Compliance
  - Allowable Solutions
- Has EPBD obligations for 2020 that may impact after this, given the “Cost Optimal” clause



- Fabric Energy Efficiency Standard **FEEs**
- Minimum overall performance of building fabric & systems on site;
  - U-Values
  - Thermal bridges
  - Airtightness
  - Heating (& cooling) system(s)
  - Lighting
- Means the energy used to maintain internal comfort per year per m<sup>2</sup> of building; kWh/m<sup>2</sup>/annum
- Not to be confused with nZEBs primary energy, which uses the same scientific units

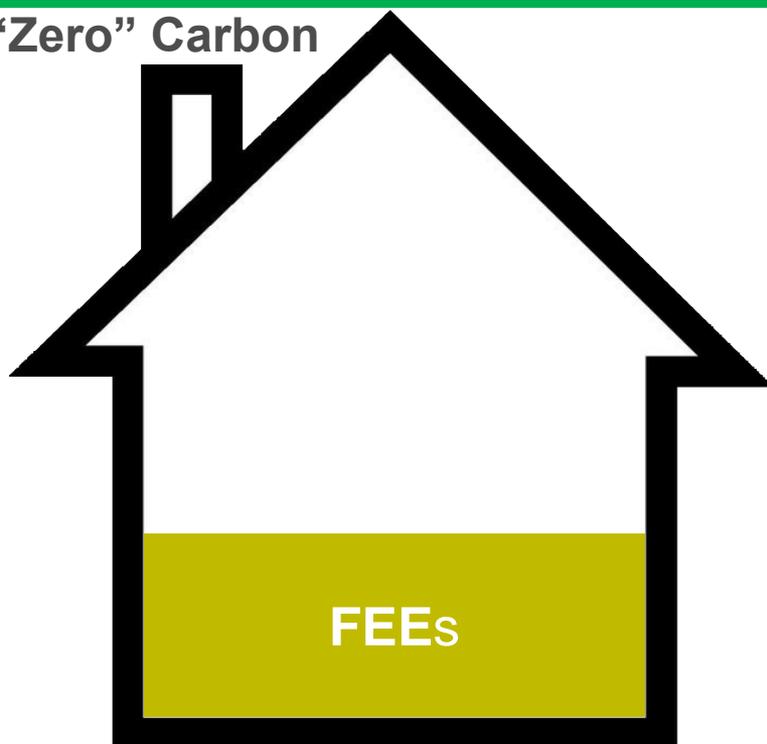


“Zero” Carbon

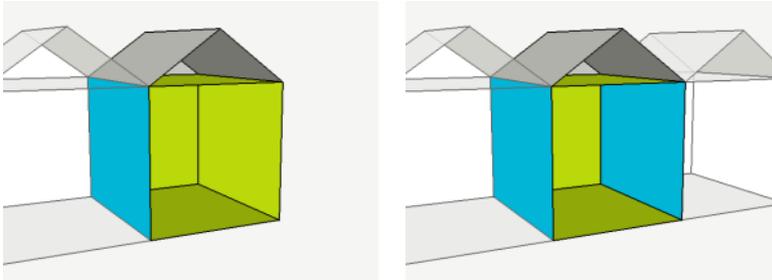


- Fabric Energy Efficiency Standard **FEEs**
- **Detached or Semi detached**  
= **c.46 kWh/m<sup>2</sup>/annum (full)**  
= c.52 kWh/m<sup>2</sup>/annum (interim 15% relaxation)
- **Terraced & Apartments**  
= **c.39 kWh/m<sup>2</sup>/annum (full)**  
= c.43 kWh/m<sup>2</sup>/annum (interim 15% relaxation)
- Backstops for worst performance of particular elements  
(Wales pushed these harder in 2014 B. Regs than England has done so far)

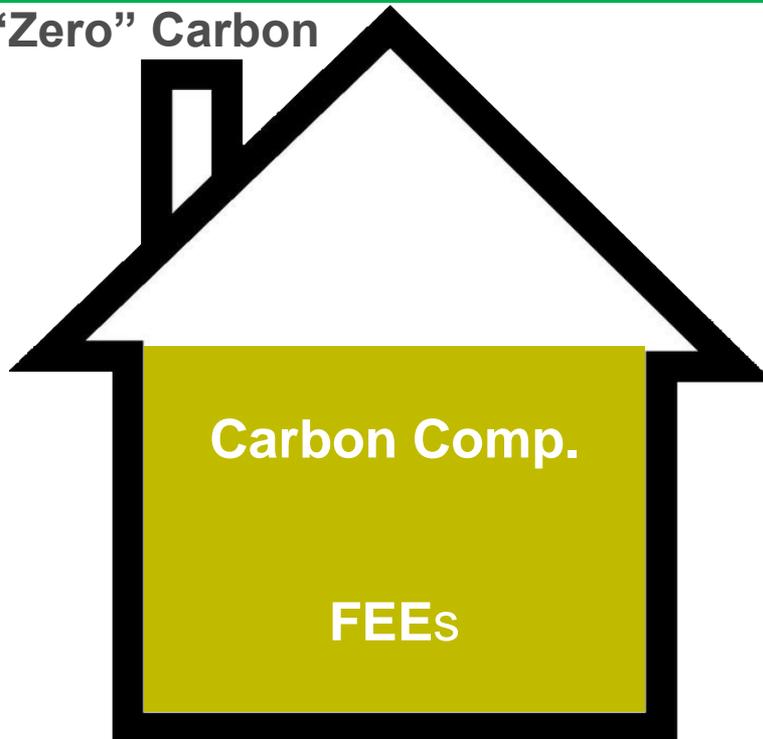
“Zero” Carbon



- **Carbon Compliance**
- Minimum energy demand of building fabric & systems on site
- Expressed as maximum energy demand per m<sup>2</sup> of building per year; kg/CO<sub>2</sub>/m<sup>2</sup>/annum
- Being seen as England’s interpretation of **near Zero Energy Buildings** under the EPBD
- All impacted by Election May ‘15!
  - Tory’s 19% over ‘13
  - Lib Dems possibly 19% too?
  - Labour 52% over ‘10
  - Greens “zero” new & refurb.
  - UKIP will just abolish it all



“Zero” Carbon



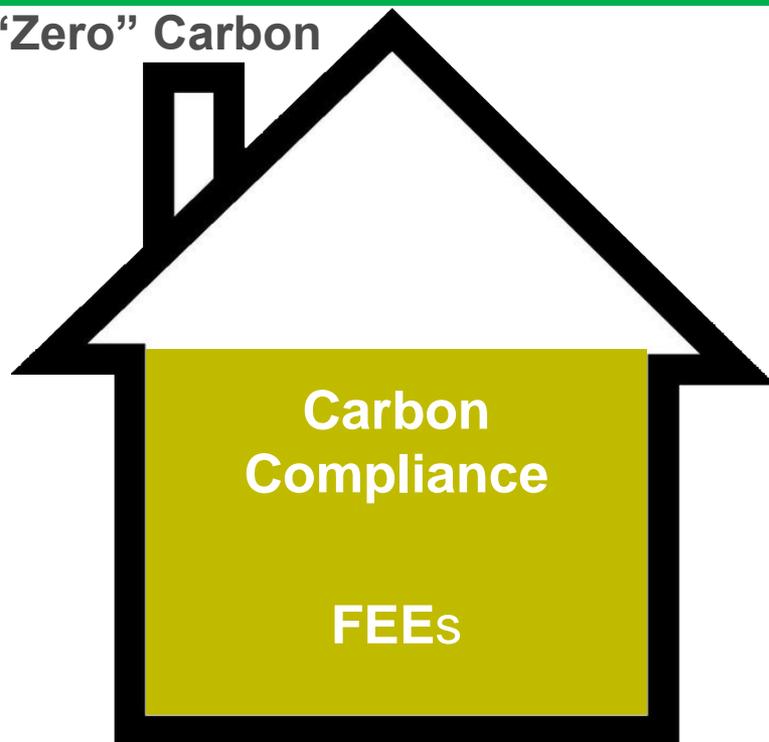
- **Carbon Compliance**
- Currently proposed as...
- **Detached**  
= 10 kg/CO<sub>2</sub>/m<sup>2</sup>/annum
- **Semi or Terraced**  
= 11 kg/CO<sub>2</sub>/m<sup>2</sup>/annum
- **Apartments**  
= 14 kg/CO<sub>2</sub>/m<sup>2</sup>/annum

(And all subject to an election!)

- **Allowable Solutions**
- One-off payment to ‘offset’ the remaining emissions to “zero” carbon
- Several types proposed:
  - DIY onsite or offsite abatement (including District Heating & local upgrade of other houses off site)
  - Independent carbon abatement contract with third party
  - Pay into a “Carbon Fund”

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“Zero” Carbon



“Zero” Carbon



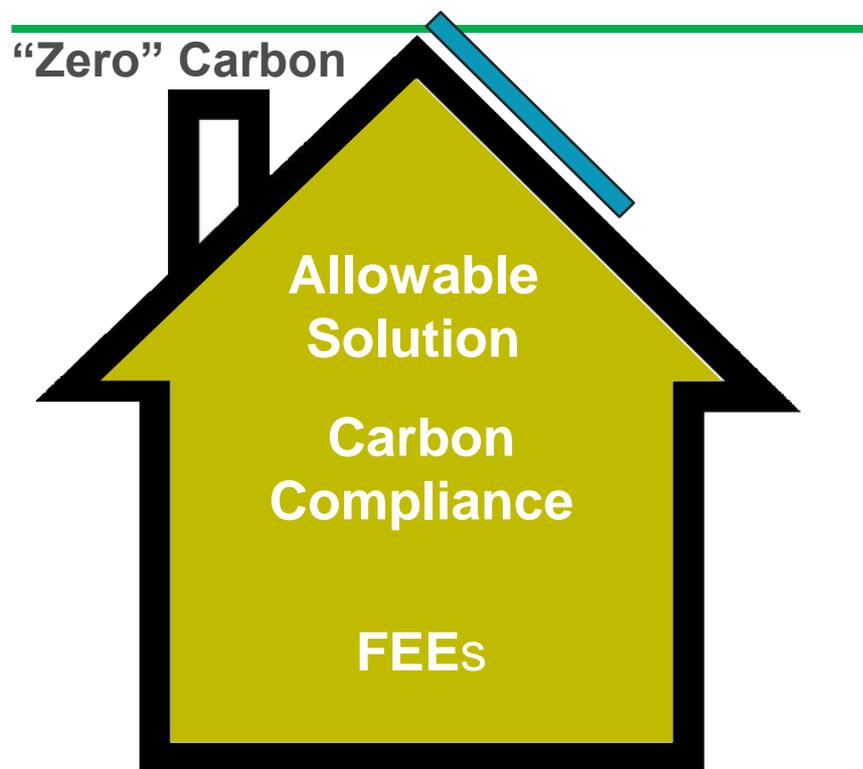
- **Allowable Solutions**
- Price cap for Carbon Fund likely to be set & reviewed every 3 years
- Cap anywhere between £36 / £46 / £60 / £90 per tonne
- Will be applied over a duration; 30 years currently proposed
- Allowable Solution price =  
Carbon still ‘emitted’ from site  
x m<sup>2</sup> of property  
x cost of carbon (£60?)  
x duration (30 years?)
- Price (& duration) yet to be set – big consequences for this!

- **How does it work in reality?**
- FEEs has a minimum, no (theoretical) maximum but the law of diminishing returns
- Carbon Compliance + FEEs has a minimum but no maximum
- Allowable Solutions will have to make up the rest; no minimum requirement

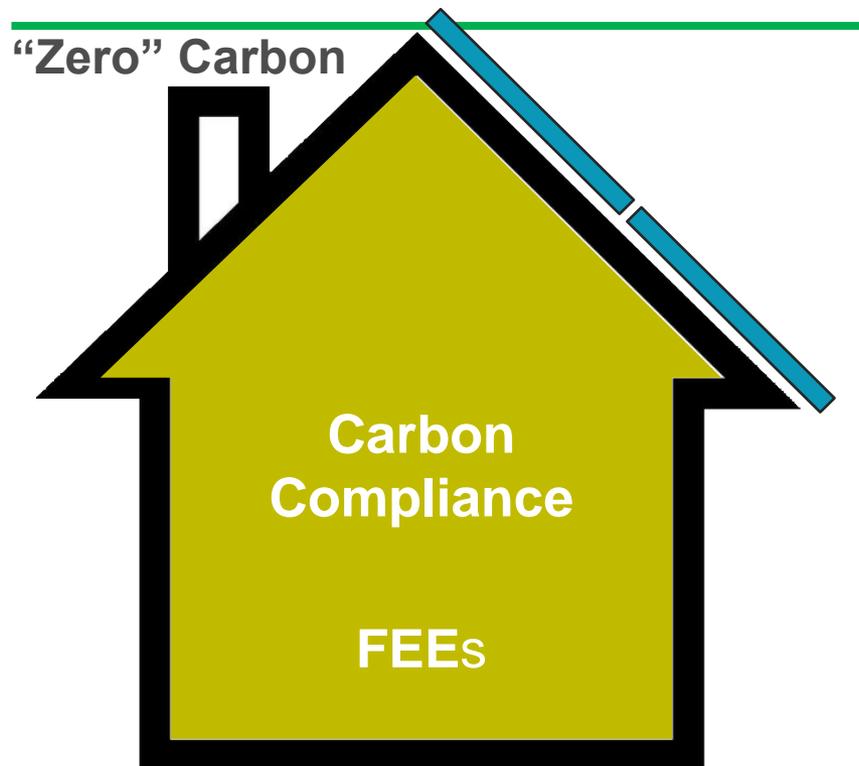
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**“Zero” Carbon**





- **Option 1 – Staggered**
- Deliver FEEs to about **46 kWh/m<sup>2</sup>/annum** (detached)
- Deliver Carbon Compliance with some on-site renewables to **10 kg/CO<sub>2</sub>/m<sup>2</sup>/annum** (detached)
- Pay your Allowable Solution fee i.e. **£1,800**  
Based on 100m<sup>2</sup> detached house & “central” carbon cost of £60/tonne over 30 years

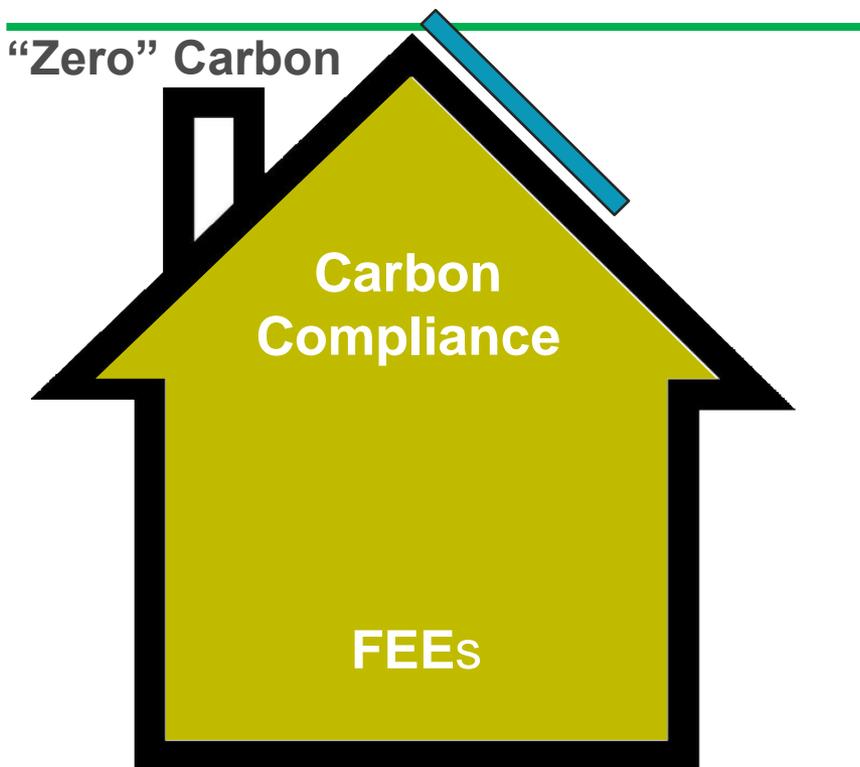


- **Option 2 – Max Renewables**
- Deliver FEEs to about **46 kWh/m<sup>2</sup>/annum** (detached)
- Push well beyond Carbon Compliance with some on-site renewables to **0 kg/CO<sub>2</sub>/m<sup>2</sup>/annum**
- Don't pay any Allowable Solution **c.£0**

“Zero” Carbon



- **Option 3 – Max Fabric**
- Push well beyond FEEs to get as close to **0 kWh/m<sup>2</sup>/annum** as you can
- Don't do any on-site renewables with Carbon Compliance met at **10 kg/CO<sub>2</sub>/m<sup>2</sup>/annum** (detached)
- Pay your Allowable Solution fee i.e. **£1,800**  
Based on 100m<sup>2</sup> detached house & “central” carbon cost of £60/tonne over 30 years



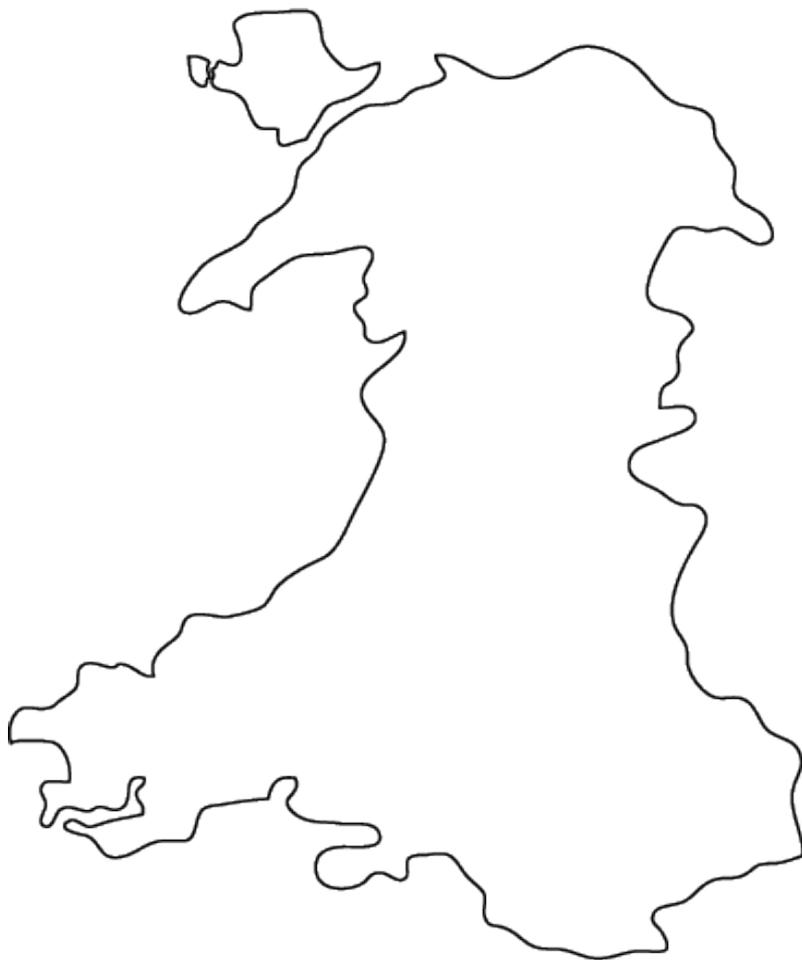
- **Option 4 – Max Everything!**
- Push well beyond FEEs to get as close to **0 kWh/m<sup>2</sup>/annum** as you can
- Push well beyond Carbon Compliance with some on-site renewables to **0 kg/CO<sub>2</sub>/m<sup>2</sup>/annum**
- Don't pay any Allowable Solution **c.£0**



- **What is England doing?**
- **Non-Domestic**
- Significant challenge around the variety of building types
- Some types may have already reached optimal fabric, others have further they can go
- Likely to still be broken into the same three basic steps:
  - Fabric Energy Efficiency
  - Carbon Compliance
  - Allowable Solutions
- More appetite for 'high level' targets that require consultants to calculate compliance

COUNTRY	ENERGY USES INCLUDED	ENERGY PERFORMANCE	RENEWABLE ENERGY SHARE
Cyprus	Regulated energy	180 kWh/m <sup>2</sup> /year	25%
Belgium (Brussels)	Heating, DHW, appliances	45 kWh/m <sup>2</sup> /year	-
France	Regulated energy	50 kWh/m <sup>2</sup> /year	-
Denmark	Regulated energy	20 kWh/m <sup>2</sup> /year	51-56%
Latvia	Regulated energy	95 kWh/m <sup>2</sup> /year	-

- **What's everyone else doing?**
- England = FEEs c.43.6 kWh/m<sup>2</sup>/annum
- Denmark = 20 kWh/m<sup>2</sup>/annum (and renewables around 50+%)
- Brussels = 45 kWh/m<sup>2</sup>/annum
- France = 50 kWh/m<sup>2</sup>/annum (including unregulated energy too!)
- Latvia = 95kWh/m<sup>2</sup>/annum (and renewables at 25%)
- Cyprus = 180 kWh/m<sup>2</sup>/annum (you have to wonder if they'll manage to do this!)



- **Wales has to decide!**
- Any questions on EPBD before we show examples from Europe?

Andy Sutton



@AS\_Architecture



SuttonA@BRE.co.uk



079 6817 8243

# Passivhaus principles: influencing future construction

Caroline Weeks  
BRE Wales & SW

Part of the BRE Trust



# Enhanced fabric performance standards: Lessons from Passivhaus

## Content: Part 2

- EU PassREg ‘Passive Regions’ project, aims and lessons
- What is Passivhaus? Key principles
  - Insulation
  - Thermal bridging
  - Windows
  - Airtightness
  - MVHR
- Beacon projects in Wales
  - Carmarthenshire school
  - Cardiff Council Housing Partnership Programme
- Quality Assurance to close the performance gap
- Passivhaus principles influencing future construction

## The PassREg project

**14 Partners. 11 Countries. 3 Years. 1 Goal.**

Supporting the growth of Passive House regions to implement EU 'near zero energy' goals in buildings from 2020

- PassReg helps aspiring regions succeed by:
  - Investigating successes
  - Making them known and accessible
  - Building up training, quality assurance and certification infrastructure
  - Stimulating the market for suitable products and professionals



## Key outputs of PassREg

- New Passive House buildings + RES throughout partner countries as case studies (*Carmarthenshire, Cardiff*)
- A ‘Success Guide’ detailing successes in frontrunner regions
- A ‘Set of Solutions’ detailing individual solutions and resources
- International and regional events and study tours
- Wider network of ‘Passivhaus aware’ professionals in the regions

See [www.passreg.eu](http://www.passreg.eu) for further information



## Renewable sources limited by practical issues

- Renewable Energy Sources have a low energy density (the relative transfer of useful energy from the resource)
- Large areas are generally required (e.g. roof areas for PV, growing areas for biomass, etc)
- What about flats/ apartments?
- Focusing on energy efficiency to reduce demand is helpful to optimise the renewable resource
- For a typical family home built to Passivhaus standard, energy demand can often be offset by equivalent roof area of PV (approx.) (i.e. net zero energy onsite)



## PassREg Frontrunner Regions: already NZEB

### Hannover, Germany



- Birthplace of PH concept
- Began in the 1980s
- Political consensus present / financial mechanisms in place

### Brussels, Belgium



- Heart of EU
- Recent political commitment to the PH standard
- Rapid growth in PH new builds and retrofits

### Tyrol, Austria



- Strong national and regional policies
- Social housing dominated construction market
- Vast improvements over last few years

## Drivers: Regulations and incentives

- Initially, introduced incentives/ subsidies based on energy performance (highest subsidy for Passivhaus standard)
- Example funding mechanisms: levy on energy prices to consumers to create national funds for subsidy (like UK FIT)
- Once capacity for delivering Passivhaus increased, Municipal Governments set minimum mandatory regulatory standards as Passivhaus for new construction
- Brussels report that it is now no more expensive to build Passivhaus (never lost skills of wet trades, so airtightness delivered at no extra cost)



## Key lessons from use of Passivhaus

- Standard successfully used all over the world (hot and cold climates)
- Used in all different types of building, not just houses (offices, schools, supermarkets, swimming pools...)
- Focus on design, detailing and onsite delivery; low/no cost elements transferrable to any scheme, particularly:
  - Thermal bridging
  - Airtightness
- Good reputation for meeting intended performance – minimal performance gap – thanks to Quality Assurance activities



[http://www.passivhaustagung.de/Kran/Passivhaus\\_Kranichstein.htm](http://www.passivhaustagung.de/Kran/Passivhaus_Kranichstein.htm)

## What is Passivhaus?

- Internationally recognised building standard, originating in Germany
- Tried and tested over 2 decades
- Applicable to a variety of building types and climates
- Maximum comfort with minimal energy use and life cycle costs
- Assessed using the Passivhaus Planning Package (PHPP) calculation tool

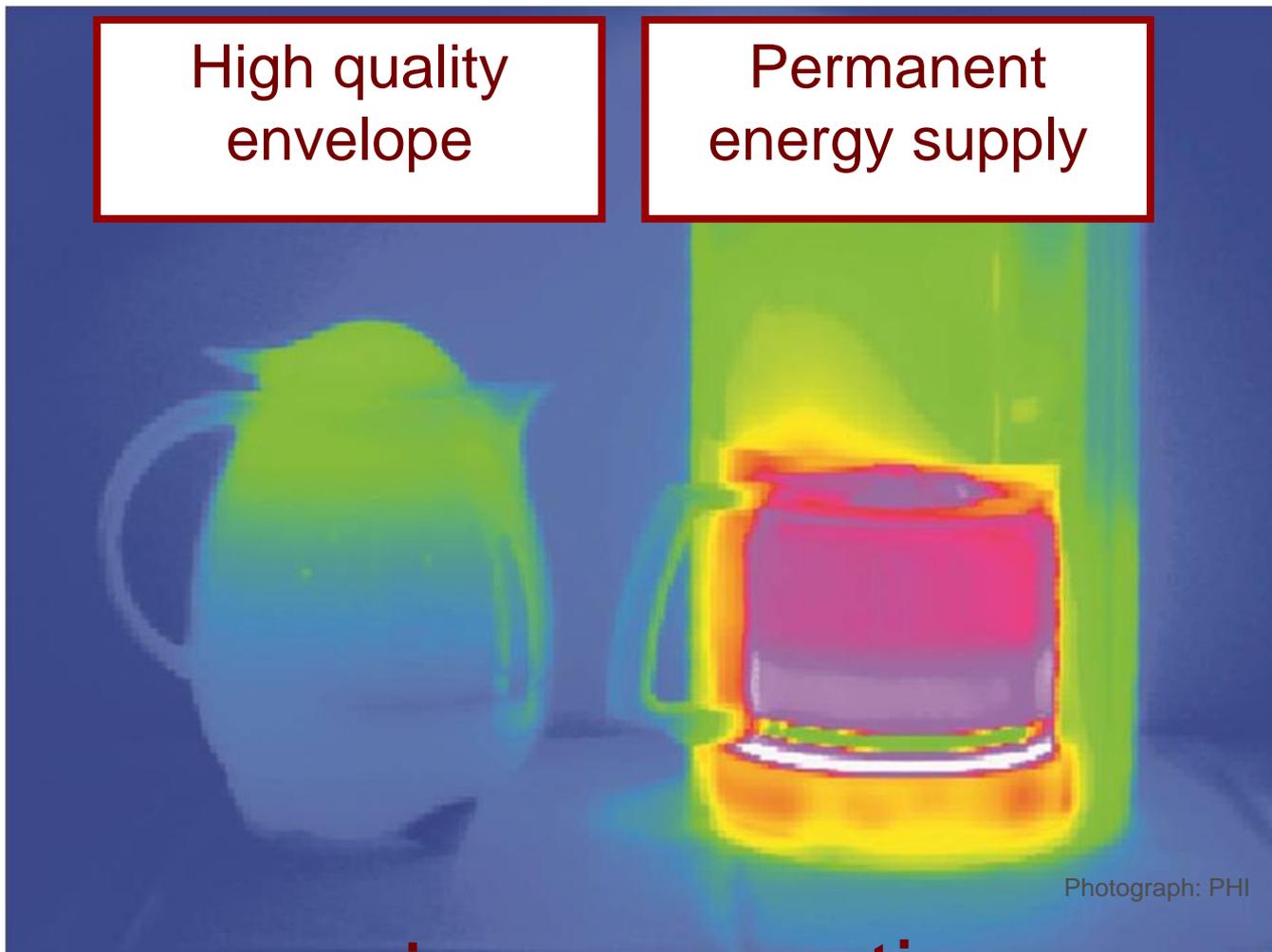


**Passivhaus buildings use up to 90% less energy than 'typical' buildings**

## Why 'passive'?

High quality envelope

Permanent energy supply



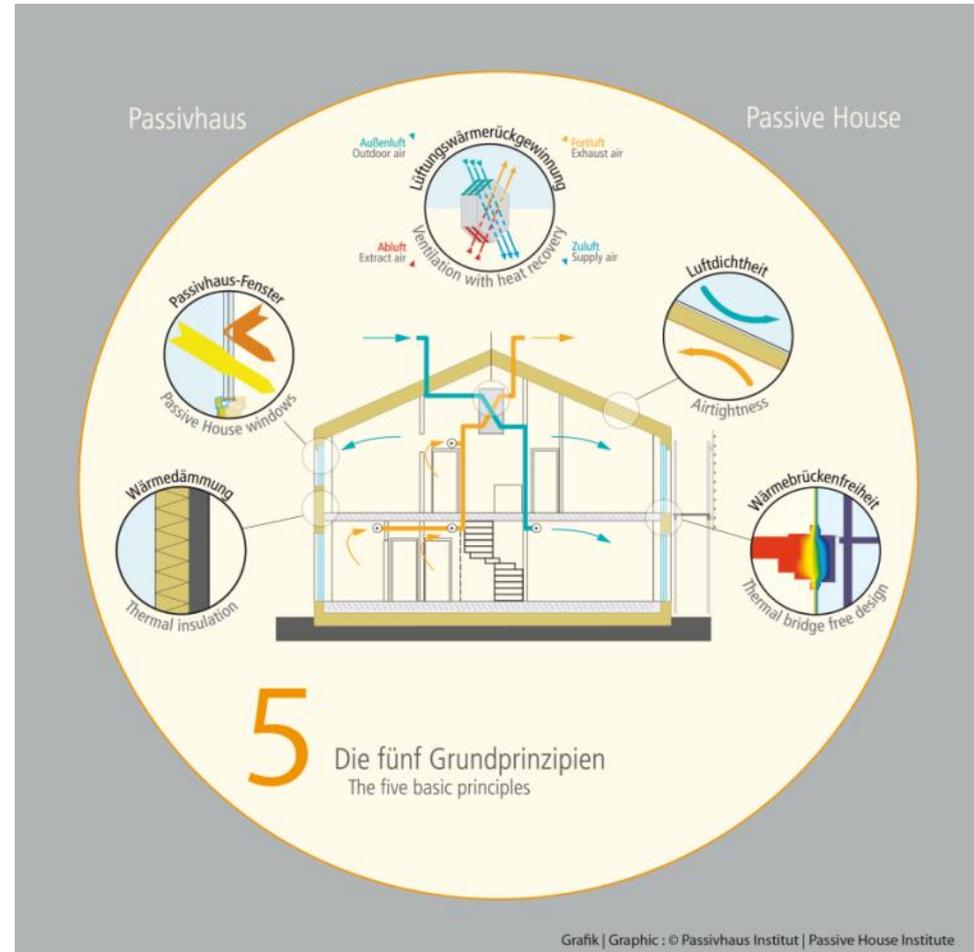
Photograph: PHI

passive

active

## Key construction principles of Passivhaus: *Fabric first approach*

- Good thermal insulation (U values  $< 0.15 \text{ W/m}^2\text{K}$ )
- Thermal bridge-free design
- Passivhaus windows ( $U_i$  values  $< 0.85 \text{ W/m}^2\text{K}$ )
- Very good airtightness
- Ventilation with heat recovery



## Passivhaus Requirements

### Energy (as measured by PHPP)

- Space heating demand:  $<15 \text{ kWh/m}^2\text{year}$
- OR, peak heating load:  $<10 \text{ W/m}^2$
- Primary energy:  $<120 \text{ kWh/m}^2\text{year}$

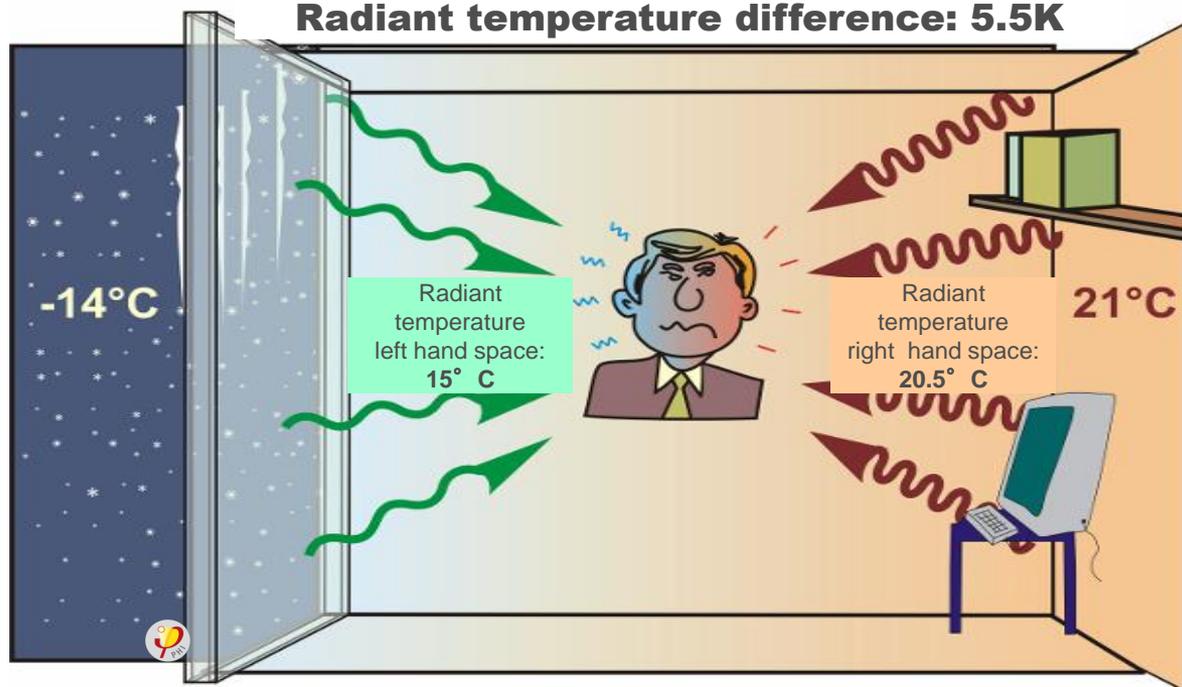
### Comfort:

- Airtightness  $<0.6 \text{ ac/h @ } 50\text{Pa}$
- Overheating  $<10\% \text{ over } 25^\circ\text{C}$
- Windows (installed)  $\leq 0.8 \text{ W/m}^2\text{K} (\leq 0.85 \text{ W/m}^2\text{K})$

## Glazing - Double glazed

Human comfort is significantly influenced by differences between surface temperatures

**Standard window,  $U_w=1.6 \text{ W}/(\text{m}^2\text{K})$   
Radiant temperature difference: 5.5K**

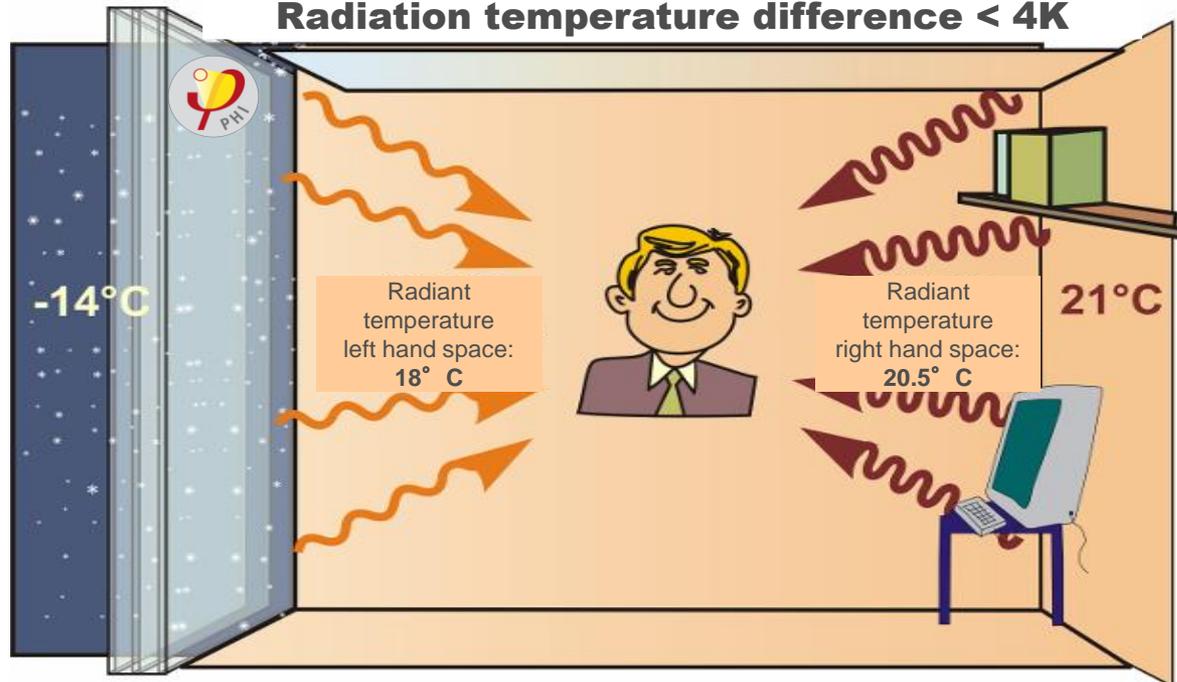


The radiant temperature asymmetry of 5.5 K is too high.  
A radiator near the window would be required to compensate.

## Glazing - Triple glazed

In a Passivhaus the time and location of the heat supply are arbitrary

**Passive House window,  $U_w=0.8 \text{ W}/(\text{m}^2\text{K})$   
Radiation temperature difference  $< 4\text{K}$**



With Passivhaus windows, the demanding requirements of the international standards for thermal comfort [ISO 7730] are met without a radiator placed under the window.

## Windows help deliver ‘free’ solar energy

- Some think of triple glazed PH windows as ‘radiators’ as they can provide the majority of heat for a building via solar gains
- Low window U value (triple glazing) to help prevent heat escaping
- Glazing ‘g’ value optimised to allow solar gains in winter
- Shading to reduce solar gains in summer
- Expensive component of a Passivhaus (but pays for itself over building life)



## Installation key to ensuring good performance



## How much fresh air is necessary?

A good quality of indoor air can be achieved with a continuous fresh air flow rate of **30m<sup>3</sup> per hour for each person.**



**Window  
ventilation is  
insufficient**

...and people don't like to open windows in winter!



Foto: PHI

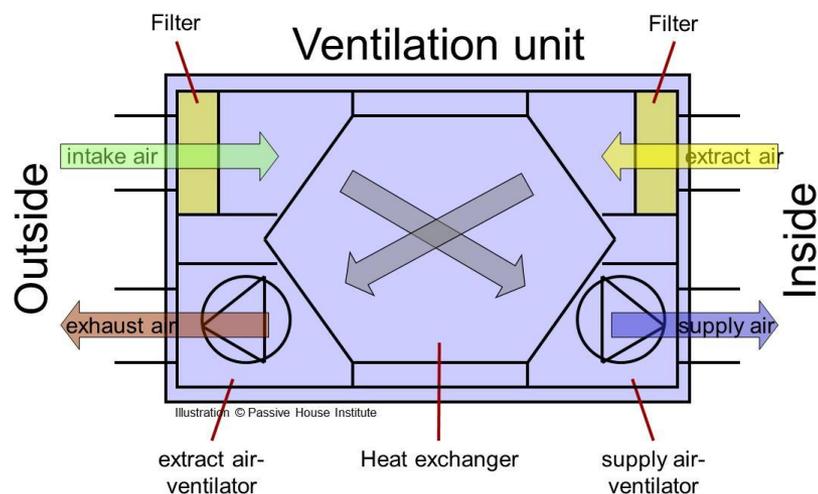
## Comfort: MVHR

- ‘Uncontrolled’ air infiltration below 0.6 ac/h
- Fresh air delivered to occupants at 15-30 m<sup>3</sup>/person.h through mechanical ventilation
- Constant circulation – no stagnant air
- Efficient heat recovery (>80%) provides fresh air with minimal heat loss, even in winter
- In summer, open the windows!
- Such low heating demand allows the space heating to be delivered via the ventilation air – no conventional heat distribution system (rads) required

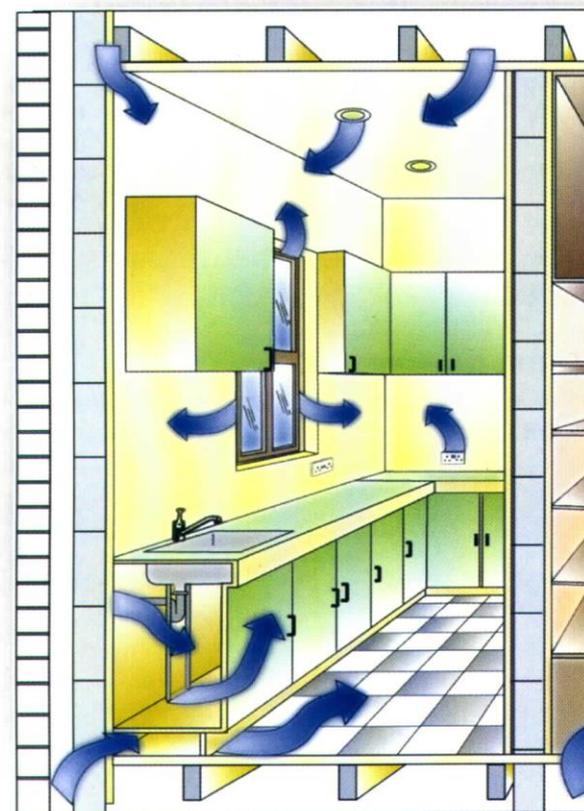
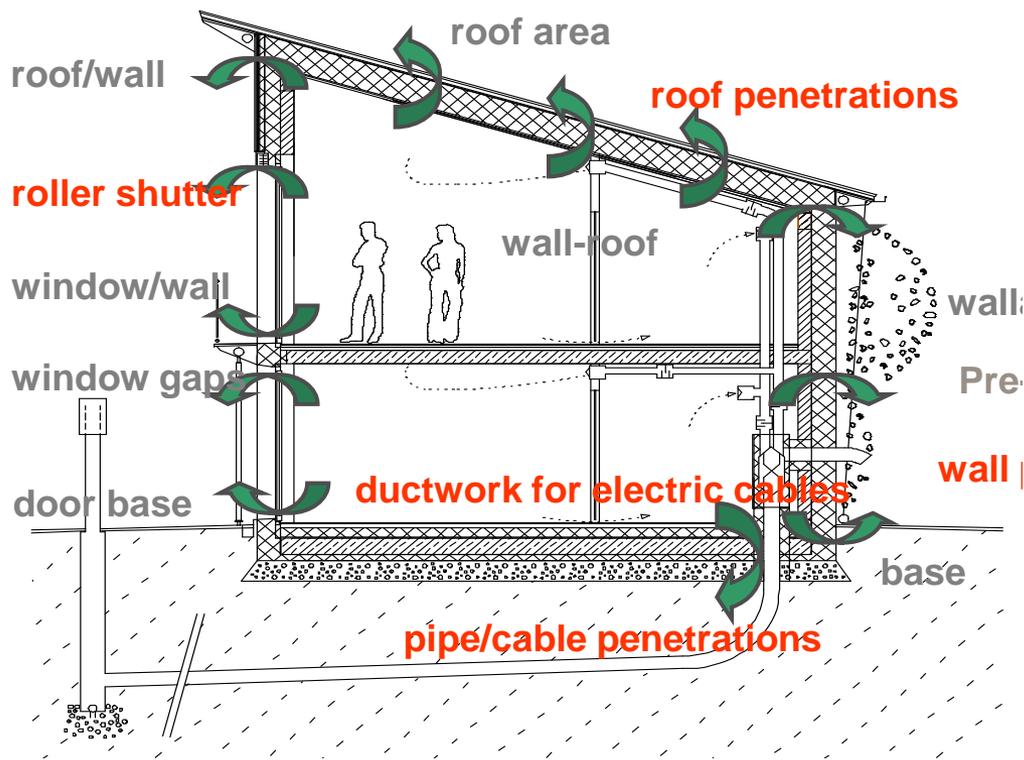


## Accepting MVHR

- NHBC stats suggest significant number of new houses are now using MVHR (around a quarter in 2013)
- Concerns over quality of early installations in UK
- Passivhaus requires system to be balanced by a professional, with independent 3<sup>rd</sup> party check
- Need to get it right to be a trusted solution for the UK
- Need to drive down airtightness to allow MVHR systems to run as efficiently as possible



# Airtightness: potential leaks & penetrations



## Airtightness test

- Testing the building's air infiltration rate by means of an air pressure test
- Every property tested **individually!** (not sample)
- Average of pressurisation and depressurisation
- 2+ tests likely rather than just at completion



# Airtightness solutions

- Some clever products
  - Tapes
  - Gaskets
- Mostly about detailing, workmanship and improving tolerances

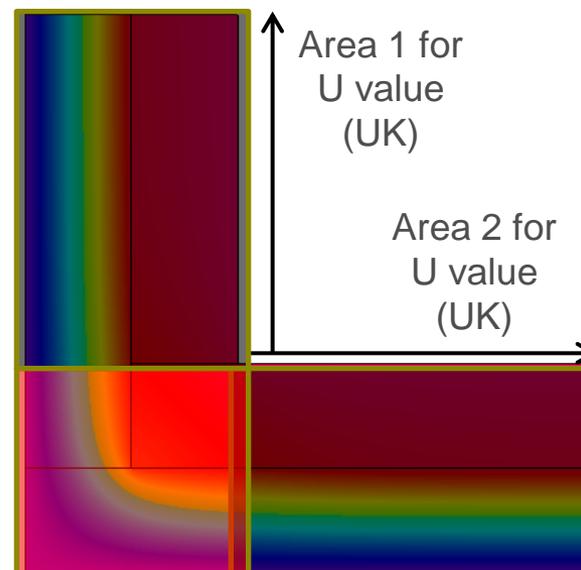


Photographs: EISEDICHT



## Note: Thermal bridges are calculated differently for Passivhaus and UK Regs!

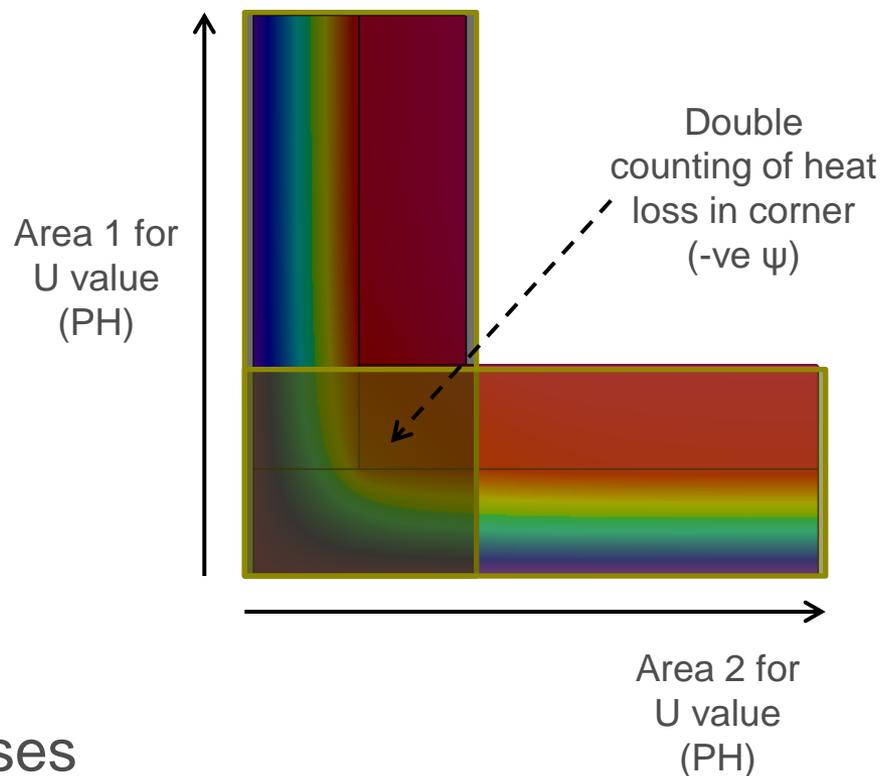
- Due to external (PH) vs internal (UK) dimension conventions
- UK Regs U values will *underestimate* overall heat loss (*can be accurate if  $\psi$  calcs accurate*)
- PH will *overestimate* heat loss from U values (*so conservative approach*)
- Need to know wall thicknesses and U values to convert between values



Residual  
heat loss  
=  $\psi$  (UK)

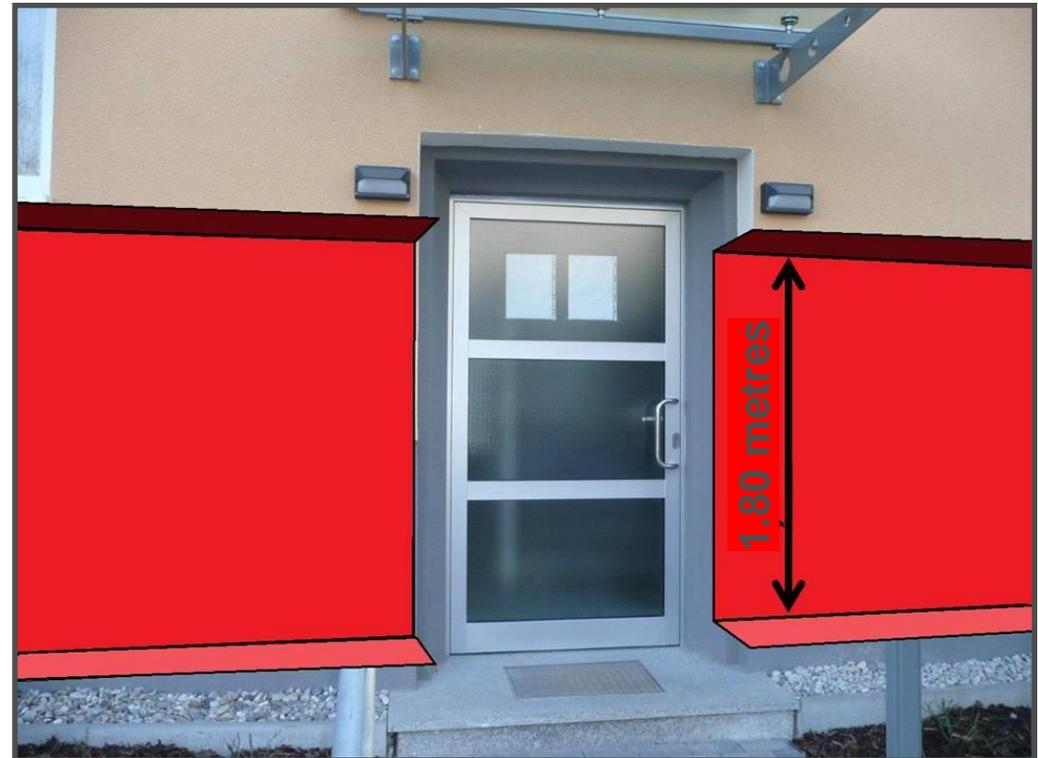
## Note: Thermal bridges are calculated differently for Passivhaus and UK Regs!

- Due to external (PH) vs internal (UK) dimension conventions
- UK Regs U values will *underestimate* overall heat loss (*can be accurate if  $\psi$  calcs accurate*)
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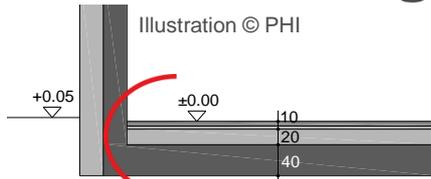
## Bridging of the insulation layer – material choice

– Example: Aluminium profile at the plinth



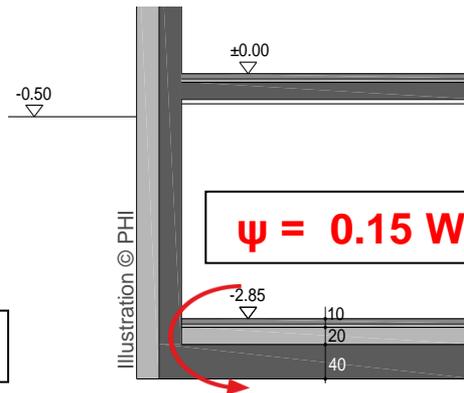
➤ High heat losses!

# Thermal bridges: Floor slab / foundation



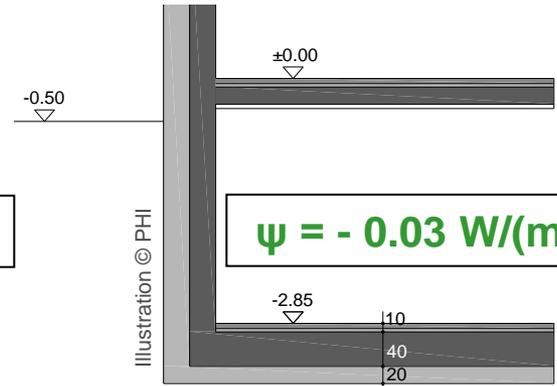
insulation on floor slab  
- near surface

$$\psi = 0.19 \text{ W/(mK)}$$



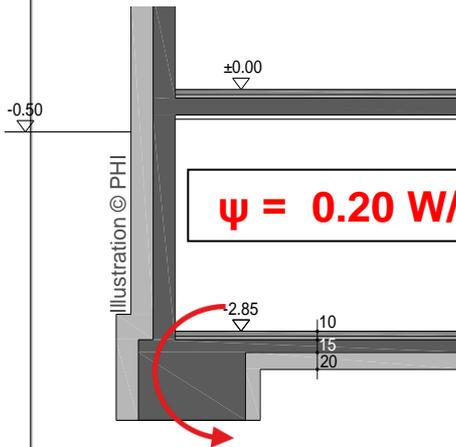
insulation on floor slab

$$\psi = 0.15 \text{ W/(mK)}$$



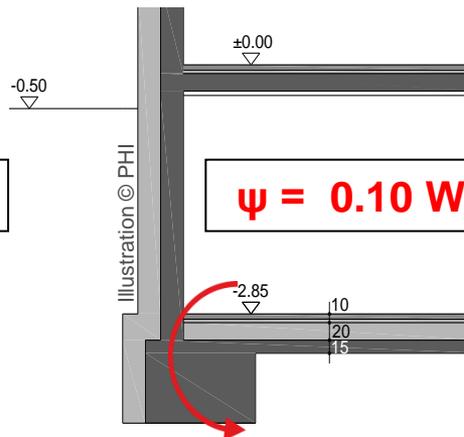
insulation under floor slab

$$\psi = -0.03 \text{ W/(mK)}$$



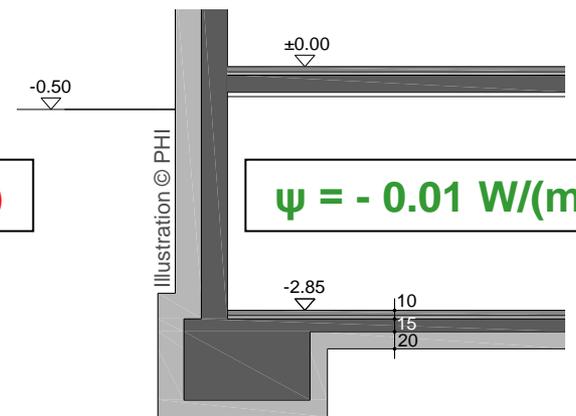
insulation under floor slab

$$\psi = 0.20 \text{ W/(mK)}$$



insulation on floor slab

$$\psi = 0.10 \text{ W/(mK)}$$



insulation under floor slab  
and foundation

$$\psi = -0.01 \text{ W/(mK)}$$

**thermal bridge free:  $\psi \leq 0.01 \text{ W/(mK)}$**

## Distribution losses

Heating demand < Heating load (ca.)	15 kWh/m <sup>2</sup> a 10 W/m <sup>2</sup>	Heating
--	--	---------

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Heating demand DHW according to occupancy	12 ... 35 kWh/m <sup>2</sup> a	Hot water
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Typical distribution losses	15 kWh/m <sup>2</sup> a (non-usable) 5 kWh/m <sup>2</sup> a (usable)
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Conclusion 1: Heat distribution losses will become relatively high.

Conclusion 2: Heat generation and heat distribution concepts must be reconsidered.

**Conclusion 3: Pipes and components need a PH-suitable insulation!**

# All pipes and ducts well insulated



Photographs © Passive House Institute



# Quality Assurance for MVHR

- PH Certification requires the ventilation system **to be balanced** by a professional
- Verified by 3rd party for Certificate
- Additional quality assurance

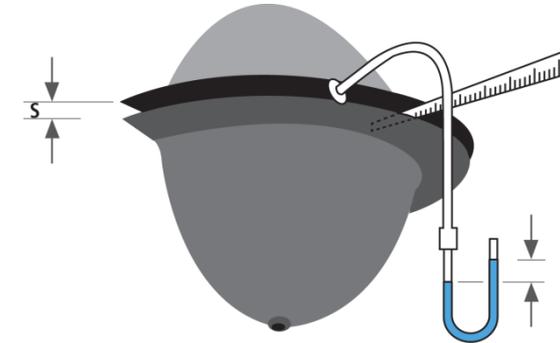


Illustration © PHI

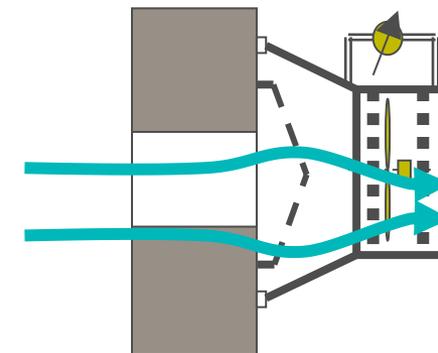


Illustration © PHI

## Airtightness test for QA

- Every property tested individually!  
(not sample)
  - Intermediate tests likely rather than just at completion?
- 
- With these key checks (MVHR, airtightness, thermal bridging detailing verified onsite), evidently much less chance of experiencing a performance gap



## Passivhaus pilot: Burry Port Primary School

- Carmarthenshire Council piloting Passivhaus on a new primary school (extension, <math><1000\text{m}^2</math>)
- **Justified by in-use savings more than compensating for any additional capital cost**
- Occupant comfort and internal environment important
- Test local supply chain issues (rural context: work here, work anywhere?!?)
- Intend to implement the principles (at least) on future projects



## Key features of the school from initial feasibility

- Large southerly glazed area for winter solar gains (shading for summer)
- Partial two storey arrangement helped to improve surface area: volume ratio
- Very low U values:
  - Walls:  $0.101 \text{ W/m}^2\text{K}$
  - Roof:  $0.101 \text{ W/m}^2\text{K}$
  - Floor:  $0.130 \text{ W/m}^2\text{K}$
- Very low (aiming for zero) thermal bridging
- Airtightness (max)  $0.6 \text{ ac/h}$
- Architects (Archetype) will investigate cross flow and night cooling strategies



## Cardiff Council Housing Partnership Programme

- Council piloting Passivhaus on a new housing site within their Partnership Programme
- Houses will be for open market sale – test the market and price
- Demonstration for potential NZEB direction by 2020 (which will be within the Partnership period!)
- **Council prepared to accept reduced land value to facilitate the scheme and effectively cover any extra capital cost**
  - (Balance of risk – hopefully market sale prices will ultimately cover any increased capital cost)



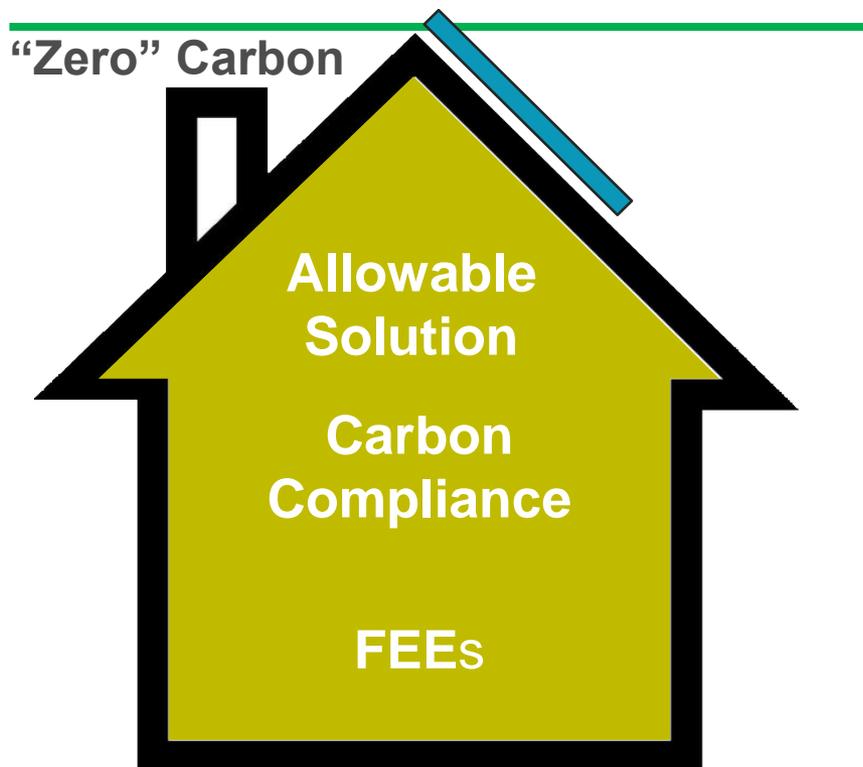
## Summary: Benefits

- Ultra-low energy demand building, so **low ongoing running costs**
  - Should pay for any additional capital in relatively short timeframe
- Generally regarded as giving very realistic energy use forecasts compared to in-use
  - Reliable budgeting
- Healthy environment for building users
  - Fresh air, no draughts, stable comfortable temperatures, natural daylight
- If going for full PH Certification, the required 3<sup>rd</sup> party checks and verification provide extra quality assurance

## Summary: What can we expect in the coming years?

- Strong emphasis on building fabric so less renewables needed for NZEB and Zero Carbon – **secure carbon savings long term**
- Buildings without conventional heating systems?
  - Triple glazed windows
  - MVHR
- Thorough commissioning & balancing of MVHR
- DHW loads & losses more significant than heating loads
- Very low U values, elimination of thermal bridging, more extensive insulation of pipes & ductwork
- Airtightness testing on every building
  - New products and techniques being used
- More thorough workmanship to deliver these principles

## What's best for Wales?



- **Option 1 – Staggered**
- Backstops for FEEs and Carbon Compliance, plus Allowable Solutions
- **Option 2 – Max renewables**
- Backstop for FEEs, maximise onsite Carbon Compliance
- **Option 3 – Max fabric**
- Deliver best possible FEEs, backstop for Carbon Compliance, plus Allowable Solutions
- **Option 4 – Max everything**
- Deliver best possible FEEs, maximise onsite Carbon Compliance, no Allowable Solutions