

By email only

David Partridge
Governance Board Chair, Net Zero Carbon Buildings Standard
Better Buildings Partnership (BBP)
1 Fore Street
London
EC2Y 9DT

14 February 2025

Dear David,

RE: Support and recommendations for the UK Net Zero Carbon Building Standard

I am writing on behalf of London Property Alliance ("LPA") to express our support for the concept of a UK Net Zero Carbon Building Standard (NZCBS), and having reviewed it in detail, our initial observations. The LPA brings together the Westminster Property Association (WPA) and the City Property Association (CPA). It is a not-for-profit membership and advocacy body representing the leading owners, investors, professional advisors and developers of real estate operating in central London. You can view our current membership lists [here](#) and [here](#).

We believe that a common, industry-wide Net Zero standard will enable the sector to take a significant step forward in helping to address climate change and enabling the UK to meet its 2050 Net Zero obligations. The draft standard currently being piloted has the potential to be a valuable tool to guide the development and real estate sectors towards more sustainable practices and ultimately achieving industry Net Zero alignment, which is something we, and our members, strongly support. However, whilst we endorse its objectives, and the direction it is looking to take, we would like to offer several recommendations to enable the sector to fully engage and utilise it, as currently there are some concerns.

1. **Interim assessment and verification:** We recommend the inclusion of interim assessment and verification stages, similar to the NABERS UK Design for Performance (DfP) methodology. This would allow developers and landlords to showcase the progress and development they are making on their buildings. Interim assessments can provide valuable feedback and recognition, encouraging continuous improvement and transparency throughout the development process that will lead to further stakeholders adopting the standard. In addition, avoid the 'one shot' accreditation approach which will prevent broad uptake.
2. **Applicability to speculative development and tenant management:** The current standard does not reflect the speculative nature of commercial development and its inherent challenges e.g. the management boundary around engaging tenants and what can be controlled and what can't and the boundaries between CAT A and CAT B fit out. The current out turn result of the standard means, a single tenant's decision to undertake an energy/carbon-intensive fit-out or have intensive business operations (exceeding the target limits) means alignment with the standard can't be achieved which a building developer/owner has no control over. We suggest allowing for the declaration of Net Zero alignment for the corresponding element(s) which correlate to management control i.e. what the landlord can control, and the tenant can control. This approach is equitable and fair and would provide a more accurate reflection of the efforts made by developers and landlords, without being unfairly penalised by the actions of tenants.
3. **Proposed targets:** We believe the need for targets in the Net Zero space is crucial, however consistency and understanding are just as important. The targets within the standard appear, at face value, to be significantly more challenging than the wider industry pathway targets many of our members are currently working to, which in themselves are proving challenging. We would recommend providing clearer explanation as to the basis of these targets and how these were benchmarked against existing industry targets in order to validate their use.

4. **Historic buildings playing their part:** Listed and heritage buildings face unique constraints that limit the range of interventions available to improve energy performance but they still have an important part to play in reaching national Net Zero. It is unclear how these buildings, which face very different challenges to 20th century stock, can effectively adhere to the current targets set out in the Net Zero Carbon Standard and achieve Net Zero alignment. We would be keen to work with you and your team(s) to understand how these buildings can align with the Standard and explore what additional support, guidance or targets they may require.
5. **Clarity and format of the standard:** The pilot version of the standard has been noted as difficult to review and understand, even for experienced engineers. We urge the committee to consider a clearer and more user-friendly format for the first official version to help drive take up. This will facilitate better understanding and implementation of the standard across the industry, and further adoption from stakeholders of the wider industry.
6. **Alignment with other standards and certification schemes:** We understand that alignment with other standards and certification schemes, e.g. NABERS UK, BREEAM, etc. is currently under development. However, we believe it is crucial to include this alignment in the first official version of the standard. Ensuring compatibility with existing frameworks will prevent duplicated work, reduce costs, and expedite the achievement of Net Zero targets.
7. **Alignment with planning policies:** We recognise that local planning authorities may wish to incorporate elements of the standard in future planning policy to ensure that new and existing buildings are aligned with the national Net Zero objective from the outset and we support consistency, clarity and a standardised approach that this could achieve. However, it is currently unclear how the standard is compatible with the stages (and the information available) and requirements of the planning process. We would urge that greater consideration be given to how this may impact and work with an already expensive, time-consuming and burdensome system, and how developers are able to demonstrate alignment at this early stage and which elements of the standard could be incorporated within planning policy to facilitate wider adoption.

In conclusion, we fully support the standard and its goals and believe it to be a potentially powerful tool for driving the transition to Net Zero buildings. However, we also believe further work is needed to develop it such that the market can adopt it. We would welcome further, open dialogue with the standard development team to discuss some the member concerns and how we can further support and collaborate on the development of the standard.

Thank you for considering our recommendations and look forward to speaking to you further.

Yours sincerely,



Charles Begley
Chief Executive
London Property Alliance

CC. Andrea Merrington, Chair of WPA Planning & Sustainability Committee, Howard de Walden Estate