Dear UK Net Zero Carbon Buildings Standard Team,

We are writing to express our strong support for the Net Zero Carbon Buildings Standard (NZCBS).

The BCO has long been an advocate for the development and operation of low-carbon buildings in the UK and beyond, championing initiatives such as the adoption of NABERS UK and the requirement for upfront and whole-life carbon assessments in line with RICS guidance.

As an organisation representing the leading UK commercial office investors, developers, owners, designers and constructors we welcome opportunities for future collaboration with the Standard, particularly in data collection and refining requirements for the commercial office sector.

During the NZCBS pilot phase, we have received feedback from our members and expert committees regarding their experiences and perspectives on the Standard. While there is overwhelming support for the principle of a unified approach to defining a net zero carbon building, they feel that it is important that the limits and requirements strike an appropriate balance between being both achievable and aspirational. Some members highlighted areas where data is currently limited and suggested that specific criteria and limits need to be refined as more information becomes available from the pilot phase studies – an area where the BCO is keen to support and collaborate.

Through our engagement with members, we have identified five key areas where the Standard could be refined to encourage greater uptake:

1. **Design Stage and In-use Operational Energy Verification:**

   Given the developer-led nature of much of the UK commercial office sector, we believe uptake would be enhanced by introducing an on-track verification process similar to NABERS UK which has the NABER DFP rating. This would confirm that designs meet the Standard, ideally with a commitment to pursue in-use certification. For example, temporary certification could be attained at practical completion based on predicted performance to enable owners/developers to describe buildings as "on-track" for NZCBS. A design-stage assessment would also enable the introduction ion of a whole life carbon limit, encouraging more durable and long-lasting solutions beyond upfront carbon considerations. At both the design stage and in-use operational energy verification, we recommend explicit alignment with NABERS UK as a deemed to satisfy route to NZCBS compliance using the stars metric, given its proven approach and growing market penetration.

2. **Delineated Certification:**

   Developers, owners, and occupiers would benefit from the ability to certify different parts of a building independently – such as owner and occupier-controlled spaces – as is currently possible with NABERS. For embodied carbon, there should be clear distinction for buildings with and without Cat A installed (if any part Cat A is installed by the building owner/developer it should be counted but be clearly shown in reporting), this would also help with contractual responsibility and associated limits.

   We understand a delineated working group has been exploring this during the pilot phase, and the BCO would be pleased to share our members' feedback and contribute to this process.

Mixed-use buildings also present challenges – delineation should separate the office base building of an asset with dominant office (>/=80% of the NIA) for the operational energy limit and should be associated with a claim for the dominant (office) use to be on track at PC and verified NZCBS compliant, with the UC limit applied to the whole building using the limit for offices, as allowed by the Pilot version of the Standard.

3. **Photovoltaic (PV) Requirements:**

   The current onsite renewable energy targets are uniform across all non-domestic buildings. Our members, having reviewed the performance of existing and proposed schemes, believe these targets are not achievable for commercial offices, which are typically located in dense urban areas with limited roof space. NZCBS should consider adopting the NABERS approach which allows PV generated power used on site to contribute to base building and whole building ratings which incentivises the use of PV where it is practically possible to do so. We do not advocate simplistic pass/fail criteria, however.

4. **High-Rise Developments:**

   Concerns have been raised regarding the upfront embodied carbon for mid- to high-rise developments. These limits are not achievable, and the downward trajectory may widen this gap over time. While we recognise the importance of pursing alignment with the 1.5°C pathway, there is a risk that leading owners and developers, especially those active in the City of London, may view the Standard as unattainable. As these organisations are likely to be early adopters, this could limit acceptance of the Standard. We suggest exploring a dedicated subsector with a transitional timeline to enable collection of the empirical data needed to calibrate the limits for high-rise developments to make compliance feasible.

5. **Refrigerants:**

   Concerns have been raised that although with greater awareness of the standards GWP limits for refrigerants and the advances in product availability may be achievable, unless these are relaxed in the short term many buildings currently in design and construction will not comply and this will limit take up of the standard.

The BCO would also advocate for a simplification of some of the rules to make it clear what limits apply from which date, especially where new builds with first fit outs are concerned.

We believe that with these refinements, informed by the pilot stage studies, adoption of the Standard within the commercial office sector could be significantly accelerated.

We look forward to continued collaboration to help transform and decarbonise the UK's commercial office sector.

Yours sincerely,

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