

# BREEAM 2014 CONSULTATION WORKSHOP

## Introduction

In June 2013 the UK-GBC held a workshop with its members<sup>1</sup> at the Saint Gobain Innovation Centre to feedback to BRE on the proposed 2014 update. It was stated by BRE that the 2014 update will not be extensive but will respond to necessary updates such as Part L and changes related to advances around industry best practice. The feedback has been split into two parts around technical content and operational issues.

## Technical

This section provides feedback around the technical aspects of BREEAM and requirements set within credits.

The group felt BREEAM should continue to advance industry best practice. Issues were raised as to the degree to which BREEAM is integrated with industry's approach to design and construction practice. For example, shell and core assessments for retail appear to have had a limited success in a retail context - see our Pinpointing discussion for more information<sup>2</sup>. Delegates suggested BREEAM staff who are responsible for developing the scheme should join projects to gather a better understanding of best practice to inform future scheme development.

While members understood the importance of mandatory credits, they can sometimes have unintended consequences such as when BREEAM is specified on speculative buildings. For example if a minimum standard cannot be achieved in one BREEAM rating category the project team will then opt for the level below and work towards an overall lower rating.

Much of the feedback also revolved around BREEAM generally becoming quite detailed, prescriptive and complex to apply with a lesser onus on the assessor to make sensible judgements around whether the aim and aspirations of the credit had been achieved on a project.



<sup>1</sup> A list of members who contributed can be found at the back of this document

<sup>2</sup> <http://pinpoint.ukgbc.org/resource/7815>



## Management

It was suggested the Sustainable Procurement credit should be split up and simplified to ensure it encourages post occupancy evaluation, it is currently quite complex.

Attendees at the workshop felt the credit for assessing lifecycle costing (LCC) needed reviewing as few organisations have the knowledge needed to achieve the credit cost effectively. It would be helpful to have some examples of where this credit has been achieved to act as a business driver for the LCC market in order to increase take up.

## Health & Wellbeing

Delegates have found that it is difficult to find materials that have been tested for Volatile Organic Compounds (VOCs) and who can offer 8hr 300 mg testing. It was suggested there may be scope for testing materials after construction when the building is in use.

It was suggested by a delegate that indoor planting should be given more priority due to the positive effects it can have on productivity and indoor air quality.

## Energy

There was an overwhelming consensus that there should be a greater emphasis on the operational performance of buildings compared with the predicted performance at design stage to ensure performance targets are met. The Soft Landings Framework process could form part of the assessment throughout the building process.

Attendees suggested that an alternative approach to measuring energy, other than via Part L, would be beneficial. BRE could consider the imminent 'TM54 - Evaluating operational energy use of a building at the design stage' due in September aimed at encouraging designers to improve predicted energy in use, taking into account unregulated loads.

The credit addressing energy efficient equipment incentivises buying new equipment, however there should be a consideration of reusing existing equipment and the embodied energy versus operational energy each option entails.

## Waste

It was suggested from a contractor that the Waste Management credits were difficult to achieve. To work towards improvement in this credit, industry would like to understand how the benchmarks were set and how projects have achieved the credits previously. This could be done via publicly available case studies (uploaded to Pinpoint?).

Delegates felt more emphasis could be placed on setting requirements for design teams to reduce waste and embodied carbon during design stages in addition to encouraging waste reduction during construction stages.

With Site Waste Management Plans being a legal requirement (although now under review) this could be removed. However, it is essential there is still an emphasis around encouraging best practice around waste management and duty of care.

## Water

Rainwater harvesting and grey water recycling are encouraged within BREEAM however they are considered expensive credits to target and can have a high embodied carbon and operational energy impact. Attendees felt there should be a requirement to carry out a feasibility study in early stages, as with LZC technologies, to review whether rain water harvesting and grey water harvesting were feasible options.



Water efficiency credits are currently awarded based on occupancy profile of building use and measured against an arbitrary baseline. Instead, industry felt credits should be awarded based on specifying the most water efficient fittings.

### Materials

The Responsible Sourcing credit is currently seen as restrictive and has had limited take up because the credit is:

- limited to complying with the BRE BES6001 standard. There are only a small number of products that comply with this standard. As such, more weighting should be given to BS8902 and ISO14001;
- requires excessive data gathering which is costly and time consuming;
- needs to be specified at the right stage of the design stage and is often missed out;
- requires the buy in of the whole value chain. It should be possible to achieve responsible sourcing credits at different stages within the supply chain rather than only being available for the whole supply chain to achieve.

Ideally, a straightforward and consistent list of requirements should be set out that can be presented to manufacturers. It was suggested by a delegate that no certification should be achieved where non-ethical labour formed part of the materials sourcing supply chain.

Elements from Mechanical, Electrical and Plumbing services ie copper, steel and hazardous materials, should be included in the responsible sourcing requirements.

There were a number of areas of feedback possibly for a longer term review around materials which includes strengthening the approach to embodied carbon & aligning EPDs as well as encouraging steel reuse.

### Transport

It was noted by delegates that the credits around Maximum Car Parking and Travel Plan can sometimes conflict with the requirements set by the Local Authority and should therefore be reviewed. It was suggested the weighting for the credit should be reconsidered and made more specific depending on building types and locations.

### Pollution

Feedback from the delegates suggested that the 5mm rule for the credit on surface water run-off is impossible to achieve in the London area.

### Calculators

Delegates suggested it would help the assessment process if calculators could be more user friendly and are reviewed and revised with input from industry.

## Process

### Feedback on the operational and process related issues include:

Many of the delegates felt the assessment process and outcome of the project would be more positive if the assessor is formally considered a third party to the project team and have the opportunity to have a deciding say over whether credits are achieved or not.

More balance and flexibility is required around the evidence and issues required in the BREEAM assessment, the way evidence is provided should also be streamlined. This could be through standard templates to give confidence in evidence generated.



There are reported difficulties with the timeframes on response to assessor queries and turnaround of quality assurance by BRE. This makes the process frustrating for many parties.

The process used in the BREEAM Communities scheme whereby all credits from the mandatory phase are achieved before proceeding to the second step was considered an innovative and welcome change. Bringing the schemes together would allow for evidence from the first step to be used as evidence in a 2014 assessment.

It would be helpful if BRE set up a forum to enable the sharing of best practice and applying BREEAM successfully.

#### **Accredited Professional role**

The AP role should be awarded based on positive influence rather than having to go through a process or qualification.

#### **Next steps**

This feedback will be provided to BRE to help assist with the 2014 update. A follow up event will be held to set out how these issues have been addressed in the 2014 update around the time the scheme is published. UK-GBC members will be invited to this event.

UK-GBC members would be interested in feeding back to BRE on any potential large-scale updates that are planned in the future. We would like to emphasise that many of the suggestions highlighted in our report<sup>3</sup> to BRE in 2010 still remain relevant. Further views from the industry relating to retail can be found on Pinpoint<sup>4</sup> and summarised in a short document on the UK-GBC website<sup>5</sup>.

#### **Attendees**

Thank you to the following attendees who contributed to this consultation response:

Dieter Gockmann, EPR Architects

Andrea Harman, Saint-Gobain Ltd

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Darren Jones, Nicholas Hare Architects LLP

Ed Dixon, Marks & Spencer

Ben Stubbs, Faithful & Gould

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<sup>3</sup> <http://www.ukgbc.org/resources/publication/uk-gbc-consultation-response-breeam>

<sup>4</sup> <http://pinpoint.ukgbc.org/resource/7736>

<sup>5</sup> <http://www.ukgbc.org/document/pinpointing-discussion-breeam-retail>



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