THE FUTURE BUILDINGS STANDARD – CONSULTATION RESPONSE

Written Evidence Submitted by the British Property Federation

British Property Federation

The British Property Federation (BPF) represents the real estate sector – an industry which contributed more than £116bn to the economy in 2020 and supported more than 2.4 million jobs. We promote the interests of those with a stake in the UK built environment, and our membership comprises a broad range of owners, managers and developers of real estate as well as those who support them. Their investments help drive the UK's economic success; provide essential infrastructure and create great places where people can live, work and relax.

The BPF has a committee dedicated to sustainability issues, reflecting the priorities that its leading members place upon issues of resource efficiency, environmental enhancement, and climate change. We are committed to the sustainability agenda and have a leading role to play in addressing the impacts of climate change. We also convene 17 other committees touching on real estate sectors and issues spanning commercial property, planning, and finance to name but a few. In response to the Ministry of Housing, Communities & Local Government consultation on changes to Parts L and F of the Building Regulations for non-domestic buildings and dwellings: and overheating in new residential buildings, we have sought views from across disciplines and have sought to respond to a selection of questions for which we are best placed to offer a consolidated view.

Top Line Response

Within the specific parameters outlined in these consultation proposals we support the government's preferred policy option to deliver an interim 27% reduction in carbon emissions compared to the current Part L standard, and more broadly, we support the overdue review of Parts L and F of the Building Regulations for non-domestic buildings given the importance of ensuring that the decarbonisation of the built environment is driven by up-to-date building, design, and construction standards. We hope that the government commits to regular reviews and updates to the building regulations.

Notwithstanding our support for some of the preferred policy options as they have been set out, we think it is crucial that any reforms to the Building Regulations are considered in the context of our collective requirement to meet net zero emissions by 2050. This is to say that whilst the proposed policy reforms offer a signal to industry that there will be tighter short-term requirements when delivering new non-domestic buildings, we are yet to have any clarity (or even indication) of the full standards that will be legislated for in 2025. Development and investment decisions can often span decades, the upfront planning and design of buildings can span years, for many organisations the standards set in 2025 will be a real consideration today. We would stress the importance of providing longer-term regulatory certainty. We envisage that this would cause a significant number of developers and investors to target higher standards earlier in an attempt to avoid iterative/abortive work, and to – as the government acknowledge – future proof buildings for net zero.

Further, whilst we support the government's overarching objectives, we have through this submission highlighted a number of matters that require further attention, including but not limited to: the merit of phasing regulatory compliance for buildings with different space heating and hot water demand and doing so by end use; the urgent need to move to different calculation methodologies for assessing the energy performance of buildings; the lack of any focus on reducing emissions through embodied carbon; and the proposed uplift in Part F standards.

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Where possible we have sought to provide BPF Comments in relation to the questions posed within the MHCLG consultation document (where indicated, question numbers therefore directly relate to those within the consultation document).

However, due to the technical nature of the consultation we have provided general feedback where views did not fit within the structure of the consultation questions.

Question 1 – Our aim is that buildings constructed to the Future Buildings Standard will be capable of becoming carbon neutral over time as the electricity grid and heat networks decarbonise. Do you agree that the outline of the Future Buildings Standard in this chapter meets this aim?

a) Yes

b) No

1. As stated in our opening comments/top line response, we support the intent of the proposals to improve the efficiency of buildings built in the short term with a view to the UK's net zero goals being achieved up to 2050. We believe the direction of travel by way of futureproofing buildings for net zero through an assumption in favour of electrifying heating and hot water demand is sound as other low carbon heating and hot water solutions such as hydrogen do not present a wholesale viable option at present.

   However, we do have a number of comments regarding the presumption that the proposals within this consultation will sufficiently contribute to achieving carbon neutrality in non-domestic buildings over time. Our main concerns in this regard relate to; the lack of any proposed 2025 standard (given developers will have only 4 years to adapt to any tightened standard); the suggested use of primary energy metrics alongside CO_2 emissions as opposed to energy intensity targets; and the continued commitment to imperfect calculation methodologies.

2. The proposals contained within this consultation and the Future Homes Standard raise an important question. What is the purpose of the Buildings Regulations? We understand that there are good examples of non-domestic buildings already being delivered to standards far higher than the suggested 2021 interim uplift. This raises a further question as to whether the Building Regulations have kept pace with industry action. The 6/7-year gap between the previous review of the Building Regulations and this consultation is nevertheless insufficient to drive the required level of change. Further, we understand that whilst there are examples of non-domestic buildings delivered to much higher standards than proposed, there are a significant number of buildings that are not. We therefore question whether the Building Regulations are intended to ensure a level of minimum standards across the country, or act as a driving force for aspirational improvements. Whilst we have not provided a view on which of these two functions the Building Regulations should provide, we would emphasise the need to act quickly and with ambition in the face of narrowing timescales for action. Further, the government should ensure that the proposals are sufficiently coordinate with other policy developments, namely the current consultation on 'performance-based ratings in commercial and industrial buildings', to establish where there may be opportunities to align these policy areas for better outcomes. We have provided more detail on the question of suitable assessment metrics within this response, but would note here that the Building Regulations and the performance-based rating framework could represent a beneficial synergy by way of delivering and monitoring more efficient buildings.

3. With regard to the proposals for an interim uplift to Part L and a further uplift to the Building Regulations in 2025 we would emphasise the need for sight of the Future Building Standard now. For many landowners, developers, property owners, and investors, the decisions they make today may not have a physical impact until 4-5 years down the line. This is to say that a developer currently moving through the feasibility process

and then the planning process would hugely benefit from understanding the standards that will be in play in 2025. This becomes particularly important in light of the proposals (which we support) for tightened transitional arrangements. Our members have discussed and analysed the merits of a proposed 2021 interim uplift for which we provide views further down our response, but a great deal more time has been spent debating the perceived intent of the 2025 standard. Given the low rate of renewal of our non-domestic building stock, it is important that buildings delivered in the short-term are truly positioned for net zero, given 2050 is now a legally binding backstop date. We would therefore encourage government to provide sight of its intentions for a 2025 standard as soon as possible. This will have positive implications for building design, materials procurement, and the wider supply chain.

Whilst the focus on different building uses with varying heating and hot water demand is welcome and a clear reason for requiring more analysis to inform the 2025 standard, we would note that different standards (and subsequent implementation dates) for different non-domestic buildings types could cause a level of confusion and inactivity that would exceed the benefits of such staggering.

4. The target for future standards should be to minimise energy intensity in buildings in-use. We have already witnessed industry attempts to focus efforts on energy intensity as a key methodological principle. The UK Green Building Council's Energy Performance Targets for Offices framework is a good example of such work, and is being implemented by industry practitioners. There is a growing consensus (also seen within other government policy proposals) that reducing the performance gap between buildings as-designed and buildings in-use is a crucial aspect of reaching net zero in the built environment. We have provided further comments relating to performance metrics within this response under questions 11 and 12.

5. Closely linked with the above, is the continued use of the SBEM calculation methodology, which is linked to variable multipliers and emissions factors. Whilst we have not gone into detail on this point, we understand that members believe the calculation methodology to have limitations in the pursuit of net zero carbon buildings. This can be seen in attempts by the real estate industry to move away from such methodologies towards those that focus on modelling, targeting, and measuring the in-use performance of buildings with a view to minimising energy use as a primary goal in anticipation of further decarbonisation of our energy sources.

6. We would also note that the government's approach relies heavily on successfully decarbonising our energy supply in the coming years/decades. Should this not be achieved our net zero ambitions will be at risk of failure. As such, attention must be given in parallel to promoting behavioural change amongst building users. As it stands the Building Regulations and government's proposed policies will not sufficiently account for or tackle unregulated energy use in non-domestic buildings. If we are to catalyse significant improvements, we will need to reduce our current levels of energy consumption over time.

Question 2 – We believe that developers will typically deploy heat pumps and heat networks to deliver the low carbon heating requirement of the Future Buildings Standard where practical. What are your views on this and in what circumstances should other low carbon technologies, such as direct electric heating or hydrogen, be used?

7. We believe that the assumptions made within this question are largely correct. In the pursuit of net zero carbon buildings efforts are likely to be focussed on the electrification of heat alongside fabric efficiencies. We do not see any evidence to suggest that alternative technologies such as hydrogen heating will be scalable in the short-term. Direct electric heating may be a viable solution in certain limited circumstances and building types, but again will not be scalable to the extent required. We understand that certain statutory consultees in the planning process believe that gas/hydrogen heating are seen as necessary solutions for certain building

types with high space heating demand, however, there remains regulatory uncertainty as to the viability of such solutions.

8. An important related point to note is the potential for variations in viability for certain solutions across different geographical locations. This is to say that higher capital expenditure on efficiencies when delivering buildings may be easily justified in areas of high values and less easily justified elsewhere. The Building Regulations have the advantage of offering a consistent set of standards to be applied across all geographical regions, which can help with planning for development across boundaries. However, as the government come to further evaluate the practicalities of improving standards in different non-domestic building types and their associated challenges, it will also be crucial to consider the local market conditions in parallel. A high cost, high efficiency solution may be appropriate in one area for a particular building type but unsuitable for that same building type in a different location.

Question 3 - Do you agree that some non-domestic building types are more suitable for low carbon heating and hot water, and that some non-domestic building types are more challenging?

a) Yes

b) No

9. Whilst we agree that some of the building types identified within the consultation will have greater challenges in efficiently delivering low carbon heating and hot water provision, we would note that the way we use our buildings is constantly evolving. One example of this is that office buildings may require increased hot water demand as sustainable modes of transport increase and occupants require showers. This is not to say that building types currently considered to be in the 'easier' category may soon be more challenging, but rather that solutions are needed at the point of design and in assessing building use. The intent of the categorisations is sound but may perhaps have the unintended consequence of limiting innovation.

10. Within this context we would also take the opportunity to raise the issue of mixed-use developments. We understand that the premise behind the categorisation of building types according to variable space heating and hot water demand is to develop a policy and regulatory framework that perhaps treats these differently in some way. We would note that many commercial property developments (subject to a single set of non-domestic Building Regulations, for the purposes of planning) will incorporate two or more of the building types within different categories. If the future Building Regulations were designed to treat such building types differently, this could create confusion and potential frictions in the construction and delivery process for said developments.

Question 4 - Do you agree with the allocation of building types to space and water heating demand types, as presented in Table 2.1 of this consultation document?

a) Yes

b) No

11. We largely agree with the categorisations made within table 2.1 but would query three aspects of this.

    Firstly, we would suggest that there are numerous subcategories of retail units, resulting in different heating and hot water demands as well as delivery solutions.

Secondly, we would note that the table references 'other healthcare buildings' within the Type 2 demand profile. This is a rather broad categorisation which implies that all healthcare buildings have a high hot water demand which is less suitable for point-of-use or heat pump solutions. We understand from our members that own and operate primary care premises, for example, that this categorisation is inaccurate and that in many of these buildings, point-of-use solutions are practical and commonly used.

Thirdly, and perhaps more broadly we would question the merit of categorising buildings by end use. Further to the feedback we have provided under question 3 we would suggest that the changing uses within buildings may lend itself to categorisation by levels of hot water and heating demand rather than the building's intended end use. It is plausible for example that in specific instances some of the building types in the Type 1 demand category may actually have high space heating or hot water demand and similarly Type 3 buildings may have low space heating demand. Categorising by end use may therefore limit the implementation of existing market solutions in certain buildings even though they are suitable.

Questions 5 – We would like to introduce the Future Buildings Standard for all buildings as quickly as possible. When do you think the Future Buildings Standard should introduce low carbon space heating for buildings with Type 1 or Type 2 demand (buildings that have space heating demand more suitable for heat pumps)?

a) 2025 – our proposed date

b) Another date (please specify)

12. Whilst we have answered 2025 to questions 5, 6, 7, and 8, we would note that such requirements will have the best impact if communicated early. The government is right to acknowledge that different building types/uses will have different demands and therefore require bespoke solutions. However, regulations should be conscious of the respective markets' ability to deliver solutions in the time scales allotted.

    Waiting longer than 2025 to implement significantly tightened requirements for all building types will likely create difficulties in sufficiently decarbonising the built environment by 2050.

Question 6 - We would like to introduce the Future Buildings Standard for all buildings as quickly as possible. When do you think the Future Buildings Standard should introduce low carbon space heating for buildings with Type 3 demand (buildings that have space heating demand less suitable for heat pumps)?

a) 2025

b) Another date (please specify)

13. See answer to question 5.

Question 7 - We would like to introduce the Future Buildings Standard for all buildings as quickly as possible. When do you think the Future Buildings Standard should introduce low carbon water heating for buildings with Type 1 or Type 3 demand (buildings that have water heating demand more suitable for point-of-use heaters or heat pumps)?

a) 2025 – our proposed date

b) Another date (please specify)

14. See answer to question 5.

Question 8 - We would like to introduce the Future Buildings Standard for all buildings as quickly as possible. When do you think the Future Buildings Standard should introduce low carbon water heating for buildings with Type 2 demand (buildings that have water heating demand less suitable for point-of-use heaters or heat pumps)?

a) 2025 – our proposed date

b) Another date (please specify)

15. See answer to question 5.

Question 9 - We would welcome any further suggestions, beyond those provided in this consultation, for improving the modelling process; Part L and Part F compliance; and the actual energy performance of non-domestic buildings. Please provide related evidence.

16. We have provided more detail on some of the limitations of the current modelling and suggestions for alternative measurement practices elsewhere in our response. However, with regard to improving the modelling and calculation process we would suggest that greater thought is given to both predicting energy use – to include unregulated energy – and how best the performance of a building can be assessed and verified in-use. We note that the government is consulting on a framework for performance-based energy ratings and would suggest that this MHCLG consultation should be closely aligned with the BEIS consultation on the aforementioned ratings system. Notwithstanding this, until we move to a system that incentivises performance efficiency over regulatory compliance, we will be limited in our ability to achieve a net zero built environment across the board.

17. Whilst not strictly relating to modelling processes or actual energy performance we would take this opportunity to emphasise the significance of embodied carbon in the overall emissions picture for new build developments as well as retrofits. As it stands, the Building Regulations do not make allowances for the measurement and consideration of embodied carbon in determining the emissions reductions associated with new buildings or renovations. In some instances, the embodied carbon associated with a development will represent a significant portion of the lifecycle carbon of the project. The real estate industry is moving towards models that consider the whole life carbon of buildings in order to minimise the impacts through construction as well as operation and demolition. We note that the GLA is to require whole life-cycle carbon assessments for referable projects with a presumption that all major applications will do the same. In many ways the operational performance of buildings has improved at a faster rate than the reduction of embodied carbon through construction. We would question whether a 2025 Future Building Standard should also address embodied carbon in the absence of other relevant regulatory touchpoints.

Question 10 - What level of uplift to the energy efficiency standards for non-domestic buildings in the Building Regulations should be introduced in 2021?

a) Option 1 – average 22% CO2 reduction
b) Option 2 – average 27% CO2 reduction (this is the Government's preferred option)
c) No change
d) Other level of uplift (please specify)

18. This aspect of the consultation proposals was discussed and considered by our members at length. In isolation the preferred option of a 27% interim uplift is deemed acceptable. However, we have previously, and will again emphasise the need for the industry to have sight of the 2025 standard sooner rather than later. In

many ways the level of an interim uplift is relative and relevant to the 2025 Future Buildings Standard. We have on one hand received representations from our membership that deem the interim uplift 'not ambitious enough'. On the other hand, some of the representations we have received acknowledge the need to establish a 27% average emissions reduction across building types in order to allow some flexibility between building types according to how easily they are able to transition based on current technological solutions and costs. What both sets of representations have in common is that with a better idea of what the 2025 standard might be, some of the lingering questions of practicality can be addressed and worked through by industry and its supply chains.

Further, we would note that amending, rationalising, or even changing the calculation methodology behind the Building Regulations could have a significantly greater impact on emissions reductions and energy use than even a much higher percentage reduction standard.

Question 11 - Do you agree with the way that we are proposing to apply primary energy as the principal performance metric?

c) Yes

d) No

19. In responding to this question we would make two principal points. Firstly, that the use of a primary energy metric has significant limitations, and secondly that primary energy metrics are not easily understood by building users, owners, and investors.

20. Primary energy is a complex metric which relies on certain variable factors for calculation. In addition, the methodology does not sufficiently account for unregulated energy/small power loads, which in many non-domestic buildings will account for a significant proportion of the given operational energy output. The government has acknowledged the significance of unregulated energy use in non-domestic buildings, but concedes that these cannot be effected/controlled by the Building Regulations. The government is however separately consulting on performance-based energy ratings in non-domestic buildings, which could form a valuable synergy with the Building Regulations regime. Further, the consultation does suggest some energy forecasting calculations to provide appropriate benchmarks for in-use performance.

    We believe that the current consultation and the later technical consultation on a Future Buildings Standard could be a major opportunity to implement an absolute metric for total energy consumed 'at the meter'. We appreciate that setting single energy use targets may prove difficult for buildings where even within the same 'use class' they are operated differently in practice, but through a robust exercise in benchmarking we believe applying an energy use intensity 'band' within which buildings must target their performance would be achievable.

    A reasonable compromise would be to drive improvements by ensuring that operational performance is assessed at the design stage as best possible through the Building Regulations and importantly through better functioning calculation methodologies, with an expectation that by aligning the Future Buildings Standard with other emerging government policies the actual in-use energy consumption of buildings can be measured and improved through a performance-based energy ratings framework.

21. Related to the aforementioned point, we believe it will be important in the short-term and long-term to facilitate greater understanding and engagement with those owning, operating, and occupying buildings. Applying a metric that equates to total energy used through a meter reading is a concept easily understood

and interpreted. This will of course require greater collaboration between building owner and occupant, but this is a piece of the puzzle that is ultimately required for our transition to net zero.

Question 12 – Do you agree with using CO2 as the secondary performance metric?

a) Yes

b) No

22. We believe that within the context of the government's preferred approach, a secondary performance metric for CO_2 has merit in acting as an additional driver to reduce carbon emissions through development.

Question 32 - Do you agree with the proposals to require building automation and control systems in new non-domestic buildings, when such buildings have a heating or air-conditioning system over 290kW?

a) Yes
b) No, a different trigger point should be used
c) No, I do not agree that building automation and control systems should be required in new buildings
d) No, I disagree for another reason

23. Yes, we agree that building automation and control systems are a valuable element of ensuring that aftercare and in-use performance reflect the design and performance modelling of a building. We would however questions how many buildings the 290kW threshold will draw into compliance.

Question 61 - Do you agree with the proposed transitional arrangements?

a) Yes
b) No

24. We agree that a level of consistency between the domestic and non-domestic regulations by way of transitional arrangements would provide those that develop both a welcome level of certainty. We were supportive of the transitional arrangements proposed through the Future Homes Standard, as a way to ensure developments are not unduly building to outdated standards. We would again however note that for the transitional arrangements to work effectively, the Building Regulations should be reviewed and updated more regularly than 6/7-year intervals.

Question 73 - Do you agree with requiring increased capacity of 50% within new ventilation systems in offices shown in paragraph 1.38 of the draft *Approved Document F, volume 2: buildings other than dwellings*?

a) Yes
b) Yes, but with qualifications
c) No, the standard is too high
d) No, the standard is too low
e) No, I disagree for another reason

25. Whilst we strongly support the intention to strengthen the standards under Part F of the Building Regulations, in recognition of improving indoor air quality and in particular to prevent the transmission of infections, we are unclear as to what calculations have informed the suggestion of a 50% increase in capacity within new ventilation systems in offices. It is critically important that the health and wellbeing of building occupants is

ensured by suitably robust ventilation systems. However, further research and analysis must be done to understand what level of capacity increase would provide an optimum solution by way of air quality whilst not increasing building energy use through ventilations systems more so than is necessary. We understand that there is currently an issue that exists whereby some buildings are 'over-built' i.e. delivered with much greater capacity in building services than will ever be required for their use. This has implications for, amongst other things, inefficiency in embodied carbon and operational energy use. An arbitrary requirement for a 50% capacity increase could exacerbate this issue.

26. Further, we have a question relating to the proposals for air quality improvements in offices. How will buildings designed with significant natural ventilation provision be treated under these proposed regulations? Buildings designed with natural ventilation as a key element of their structure will have certain advantages over mechanically ventilated and cooled buildings. We would welcome clarity on how the proposed regulations might interact with buildings of this kind.

Question 76): Do you agree with the proposal for indoor air quality monitoring in offices as outlined in paragraphs 1.39 to 1.41 of draft *Approved Document F, volume 2: buildings other than dwellings*?

a) Yes
b) Yes, but with qualifications
c) No

27. Air quality monitoring can be a valuable tool if used in the correct ways. The proposals within the consultation are worded such that air quality monitoring could be provided either within an office space or as part of the ventilation management system itself. We would emphasise the importance of ensuring that air quality monitoring is integrated into ventilation management systems so that the data gathered is subsequently informing building management decisions rather than merely gathering data for no practical use.

Question 79 - Do you agree with the proposed minimum ventilation standard in occupiable rooms in all types of non-domestic buildings where singing, loud speech or aerobic exercise may take place, where low temperature and low humidity environments may exist, or where members of the public may gather in large groups? These are outlined in paragraphs 1.27 and 1.28 of draft *Approved Document F, volume 2: buildings other than dwellings*.

a) Yes
b) Yes, with qualifications
c) No

28. We would reiterate the point made under question 73, that further research and analysis must be undertaken to understand the optimum balance between the provision of acceptable air quality and energy output associated with said buildings. We would however add that to some extent bespoke solutions will be needed for certain buildings as the way we use them is likely to evolve in the coming years and decades.

Question 81 - How should the Government address the overheating risk?

a) Through a new requirement in the Building Regulations and an Approved Document, as proposed in this consultation
b) Through Parts L and F of the Building Regulations
c) Through government guidance
d) I have an alternative approach

e) **It isn't an issue that needs addressing**

29. With the increased incidences of overheating in new residential buildings and the prospect of further increases to average summer temperatures we welcome the government's proposals to mitigate overheating risk through the Buildings Regulations.

Question 82 - Do you agree with the buildings that are in scope of this new part of the Building Regulations?

a) **Yes**
b) **Yes, but they should be expanded to include more building types and/or existing buildings**
c) **No, they should be reduced to only include flats and houses**
d) **No, I disagree for another reason Please explain your reasoning.**

Question 83 - Do you agree that the division of England based on overheating risk detailed in paragraph 5.6.3 of this consultation document is correct?

a) **Yes**
b) **No, there should be one area**
c) **No, there should be more areas**

Question 83 - Do you agree that the division of England based on overheating risk detailed in paragraph 5.6.3 of this consultation document is correct?

a) **Yes**
b) **No, there should be one area**
c) **No, there should be more areas**

30. We do not believe any of the given answers adequately represents our view, but that c) is the closest. Whilst there is merit to treating London as a distinct area given the significant urban heat island effect, we would note that other dense urban areas will have similar circumstances and should therefore be treated as such (although it is acknowledged that London also has some unique characteristics in that there is a higher proportion of single aspect flats). Further, we would suggest that using 'Greater London' as a boundary for the definition may be problematic as very similar conditions will exist just outside the M25.

Question 84 - Do you agree with the categorisation of buildings into Group A and Group B as detailed in paragraph 5.6.5 of this consultation document?

a) **Yes**
b) **No**

Question 100): Do you agree with the proposed requirement to provide information on the overheating strategy to the building owner?

a) **Yes, I agree with the requirement, the list provided and that this should be within a Home User Guide**
b) **Yes, I agree with the requirement, but think that the list provided should be changed or that this should not be provided within a Home User Guide**
c) **No, I do not agree with providing information**

31. We agree with the requirement to provide information on the overheating strategy of a building for its owner/occupant. Whilst the Building Regulations play a crucial role in improving the quality of new buildings over time as technology and building techniques evolve, a significant element of sustainability and efficiency falls outside of the remit of the regulations. Occupant behaviour is in many instances even more critical to the indoor environment and better understanding of how their property can help to mitigate adverse temperatures should be facilitated wherever possible.

Question 103 - Should the transitional arrangements that apply to the overheating requirements align with the proposed transitional arrangements for Part L and F 2021 for new dwellings, as described in paragraph 5.10.2 of this consultation document?

a) Yes
b) No

Question 104 - Do you agree with the proposed minimum fabric standards for existing domestic buildings set out in Table 6.1 of this consultation document?

a) Yes
b) No

32. We agree with the new standards because they won't impact all retrofits and will not be too burdensome to achieve across a large portfolio. Where the standards could be difficult to achieve is for heritage assets. Heritage status will sometimes restrict what can be achieved but this has always been the case and it is assumed, unless detailed otherwise, that the decisions in favour of heritage (over improvements) where buildings have statutory protection in place will continue.

Question 110 - What level of FEES should be used for Part L 2021?

a) Option 1, full fabric specification

b) Option 2, fabric specification x1.15

c) Neither, it should be higher

d) Neither, it should be lower