



Sustainability of the built environment

Environmental Audit Committee

Date: 15 May 2021

Summary and recommendations

The CLA

5. The CLA's 28,000 members manage around half the land of rural England, including an estimated half a million existing buildings (residential and commercial; owner-occupied and let), and including a quarter to a third of pre-1919/heritage buildings.
6. The CLA has long supported measures to mitigate climate change, and regulation on this, provided it is proportionate, transparent, consistent, targeted, and effective.
7. Over the last decade, we have been extensively involved in advising members on decarbonising buildings, including in relation to the MEES Regulations. In practice, that means encouraging decarbonisation methods which work, are cost-effective, and do not cause harm to the structural integrity of buildings or human health - but it is important to note that, so far, these often do not coincide with EPC recommendations.

Responses to the specific consultation questions

8. Although we have a general understanding of the topic areas set out in the consultation questions, we do not have the technical knowledge required to answer many of these in detail. Accordingly we respond to only some of the questions, as follows:

How can materials be employed to reduce the carbon impact of new buildings, including efficient heating and cooling, and which materials are most effective at reducing embodied carbon?

9. The current 'energy efficiency-only' (or 'operational-carbon-only') approach is incompatible with achieving the 2050 target: embodied carbon will be half of the entire whole-life carbon footprint of buildings from now until 2050 (see for example [Bringing embodied carbon upfront: coordinated action for the building and construction sector to tackle embodied carbon](#), World Green Building Council, 2019, especially p7). The carbon impacts of different materials, and their lifespans which determine their whole-life carbon impacts, vary greatly. Your committee should be pressing Government to ensure that these are understood before decisions are taken on decarbonisation policy; and that they are incorporated into SAP, EPCs, and Building Regulations as soon as possible, to allow much more accurate and effective decisions on individual sites and buildings.

What role can the planning system, permitted development and building regulations play in delivering a sustainable built environment? How can these policies incentivise developers to use low carbon materials and sustainable design?

10. The planning system and building regulations are supposed to take sustainability into account, but again they cannot achieve that until planning policy, planning decisions, and building regulations policy are informed by a full understanding of sustainability, especially whole-life carbon impacts, not just the narrow concept of 'energy efficiency'.
11. It is important that permitted development encourages conversion to new uses, not just demolition and replacement - and indeed that is already the case, as for example with the Class Q etc schemes for the conversion of agricultural buildings to new uses. It is important that these continue, and there may be a greater role for permitted development in encouraging re-use rather than demolition, in addition to other tools (see 13 and 14 below).

What methods account for embodied carbon in buildings and how can this be consistently applied across the sector?

12. We cannot advise on the detail, but we know that much work has already been done and is being done on this. Your Committee could helpfully press Government to encourage this, and more importantly to take this into policy and practice as soon as possible.

How should re-use and refurbishment of buildings be balanced with new developments?

and

What can the Government do to incentivise more repair, maintenance and retrofit of existing buildings?

13. Again, by ensuring that policy and decision-taking are based on sustainability and whole-life carbon impacts, not just 'energy efficiency'.
14. A key additional factor is VAT: the zero-rating of new build in contrast to the standard-rating of most work to existing buildings strongly incentivises demolition and replacement, with adverse carbon impacts. Government should be encouraged to equalise VAT rates to remove this perverse incentive. (This could obviously if desired be done at a rate chosen to be tax-revenue-neutral for government; and the change would be unlikely to substantively increase the price of new houses or other development because it would - as with any increase in development costs - impact mainly on site value, ie reducing the price the developer would pay for the site).



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