

Royal Institute of British Architects

Department for Environment, Food & Rural Affairs: Consultation on the draft policy statement on environmental principles June 2021

The Royal Institute of British Architects is a global professional membership body driving excellence in architecture. We serve our members and society in order to deliver better buildings and places, stronger communities and a sustainable environment. Being inclusive, ethical, environmentally aware and collaborative underpins all that we do.

The RIBA welcomes the opportunity to respond to the consultation on the draft policy statement on environmental principles.

On 29 June 2019 RIBA Council voted to join the global declaration of an environment and climate emergency, two days after the UK government passed a law to require the UK to end its contribution to global warming by 2050 by bringing all greenhouse gas emissions to net zero.

The climate emergency demands urgent action and leadership by the Government, architects and the wider construction industry. We welcome the direction of travel signified by many of the measures proposed in the draft policy statement. However, we believe that there is a need for greater ambition on behalf of the Government if we are to reduce our impact on the environment and significantly improve the performance of buildings.

The RIBA welcomes that the Government is committed to leaving the environment in a better state than that in which we inherited it and that the five environmental principles will be enshrined in the Environment Bill, something which we called for in our initial consultation response. We believe the principles proposed are generally sound and will help to ensure that environmental protection forms an integral part of policy development across Government.

Government policy must consider the best outcome for the environment, even if that means “not doing something”

The environmental principles, however, only focus on making policy decisions which are as sustainable as possible – they do not commit to “not doing something” if that is the best outcome for the environment. Some decisions or policies are simply not sustainable and will negatively impact the environment but there is no commitment in the draft policy statement about refusing a policy or decision in these situations. For example, the Government’s extension of permitted development rights and current public procurement processes are in direct conflict with the Government’s environmental ambitions.



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The Government's extension of Permitted Development Rights does nothing to ensure new homes are sustainable

Permitted Development Rights (PDR) means that local authorities now have very little control over many aspects of change in their area and it allows for building owners to undertake certain types of work without the need to apply for planning permission. While a significant number of homes have been delivered, removing the oversight of local authorities and the planning system from the process has led to a decline in standards. The lack of regulation has seen a substantial number of extremely poor-quality housing since the policy was introduced.

There are no requirements relating to the quality, size or sustainability of new homes delivered through the conversion of offices and commercial premises to dwellings. It is vital that all new homes – including those undertaken via PDR are sustainable and energy efficient.

Homes must be sustainable, long-lasting, affordable and contribute to the health and happiness of the people that live in them. PDR is fundamentally changing our building stock without consideration to sustainability and space standards.

In addition, the Government's proposed amendments to the National Planning Policy Framework highlight the importance of sustainable development within the planning process; however, the expansion of PDR is in direct opposition to this as it does not guarantee sustainable or energy efficient homes.

Permitted development must be restricted to create a level playing field that ensures that all homes and buildings meet the same scrutiny, sustainability, and quality standards.

The Government must procure projects in a way that focuses on sustainability, quality and long-term value rather than simply minimising costs

The value of a building goes further than just the financial costs and effective public procurement prioritises good design outcomes and can maximise the environmental, social, and economic benefits of development. Sometimes as a result of poor procurement practice or lack of in-house expertise, public clients don't get what they expected, and communities don't get the quality they deserve.

Procurement procedures should be selected and tailored to suit the project needs and should take an outcomes-based approach. The RIBA welcomes the introduction of the *Social Value Act 2012* which legislated to introduce better accountability of social value through government spending. However, there is scope for more to be done to ensure the Government procures in way which protects the environment.