

Royal Institute of British Architects

House of Commons Environmental Audit Committee: Mapping the path to net zero: local government and net zero in England August 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 Royal Institute of British Architects (RIBA) welcomes the opportunity to respond to this inquiry. Around 40% of global carbon emissions stem from buildings and architects have a significant role to play in reducing UK greenhouse gas emissions. The RIBA joined the global declaration calling an environment and climate emergency on 29 June 2019; just two days after the UK government passed a law stipulating the UK end its contribution to global warming by 2050, by bringing all greenhouse gas emissions to net zero.

The RIBA welcomes the direction of travel signified by many of the measures proposed by Government in recent years to help the UK reach net zero. However, we believe that there is a need for greater ambition if we are to significantly improve the performance and reduce the environmental impact of the built environment.

Local authorities are key players in addressing the climate emergency and many have set themselves very ambitious targets to reach net zero, often well before the UK target of 2050. The RIBA recommends that the Government help local authorities reach net zero by:

- Bringing forward a framework for delivery of climate targets, taking into consideration local contexts
- Introducing a National Retrofit Strategy – a long-term plan and investment programme for upgrading the energy efficiency of our housing stock
- Bringing forward additional funding and resources for local authorities to help improve the energy efficiency of the building stock in their local area
- Ensuring sustainability is at the heart of the planning system
- Promoting and undertaking Post Occupancy Evaluation to ensure value for money

What should local authorities' roles and responsibilities in reaching net zero by 2050 be? How clear are the expectations about the role of local authorities?

The UK has legislated to reach net-zero by 2050 and local authorities have a key role to play in reducing carbon emissions. The Climate Change Committee (CCC) believe the Sixth Carbon Budget can only be achieved if Government, regional agencies and local authorities work seamlessly together.

More than half of the emissions cuts needed rely on people and businesses taking up low-carbon solutions – decisions that are made at a local and individual level. While local authorities are responsible for 2 – 5% of local emissions, they can potentially influence around a third of an area's emissions through place-shaping and leadership.

Local authorities are key players in addressing the climate emergency and many have set themselves very ambitious targets to reach net zero, often well before the UK target of 2050. It is imperative that local authorities have the knowledge, skills, and clout to address carbon emissions from the built environment in their local area.

However, under current law, local government in England does not have a statutory duty to act on climate change. Nevertheless, under the 'general power of competence' councils can take relevant steps.

There is also limited mention of the role of local authorities in many of the Government's recent net zero announcements and strategies. A lack of clarity on the role of local authorities and piecemeal funding have hampered local authorities' ability to plan and implement climate action strategies. A framework for delivery of climate targets, taking into consideration local contexts, is required to ensure cohesive and effective action.

The COVID-19 pandemic has raised fundamental questions about how we organise communities and design public space. From street layouts, public transport, green spaces, and housing – adapting to COVID-19 has affected how we live locally. Local authorities understand their local area and this knowledge should be incorporated into net zero plans.

What are the priorities for change or clarification to align the national planning framework with net zero?

The changes to the National Planning Policy Framework (NPPF) lack the policies to achieve net zero by 2050. It was positive to see that developments are now required to improve the environment and mitigate climate change and sustainable development definitions have been widened to 'protect and enhance' the environment. However, these changes do not go far enough. We need further amendments to strengthen environmental rules and greater emphasis on the critical role local authorities play in reaching these targets.

The NPPF is only one element of the planning reforms, the *Planning for the Future White Paper* (White Paper) was also disappointingly light on embedding sustainability within the planning system.

The White Paper lacks any mention of our global climate emergency. The planning reforms are a once-in-a-generation opportunity to embed sustainable development into the planning system and these must provide the industry with a clear pathway to net zero carbon. However, the current

proposals do almost nothing to guarantee the delivery of affordable, well-designed, and sustainable homes.

In addition, the White Paper suggests the merging of the Environmental Impact Assessment with the Sustainability Appraisal. If we over-simplify these tests, we risk damaging environmental and ecological standards as opposed to enhancing them. If the Government does create a new single 'sustainable development test', it must be based on the UN Sustainable Development Goals – and be ambitious, flexible, and holistic.

The White Paper pits the environment against other aspects of development by suggesting that local plans must 'strike the right balance between environment, social and economic objectives.' However, sustainability experts can help deliver local plans and improve social and economic objectives, while still being sustainable.

The extension of Permitted Development Rights (PDR) means that local authorities now have very little control over many aspects of change in their area, particularly in town centres. PDR 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, the lack of regulation has seen a substantial number of extremely poor-quality housing since the policy was introduced.

Removing the oversight of local authorities and the planning system from the process has led to a decline in standards. There are also 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. This failure to take a holistic view of what constitutes good design will inevitably lead to the continued and accelerated development of sub-standard housing.

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

What funding and resources are available for local authority work on net zero, and what are the priorities for improving local authority funding?

The new UK Infrastructure Bank (UKIB) has been allocated £12 billion of equity and debt capital and £10 billion of guarantees to enable sustainable lending and investment. The aim of UKIB is to drive regional and local economic growth and support organisations to tackle climate change. Improving the energy efficiency of our existing housing stock can help both these objectives. However, the Bank will focus on lending to clean energy, transport, digital, water and waste – noticeably missing key areas such as the built environment.

Local authorities and social housing providers are active in delivering energy efficiency improvements but installing energy efficiency and low-carbon heating in these homes is subject to funding constraints. Therefore, Government must urgently bring forward the remainder of their commitment to the £3.8 billion capital Social Housing Decarbonisation Fund.

A retrofit revolution led by social housing landlords would not only cut carbon emissions and help fight climate change, but would also create jobs, support local economies, and help tackle fuel poverty – whilst helping a green economic recovery from the COVID-19 pandemic and “level-up” across the country. Ramping up delivery of energy efficiency measures as a step on the way to decarbonising heat more fully, is something all local authorities with housing duties should do.

Schools, leisure centres and community buildings account for a large proportion of energy use for councils across non-domestic buildings. These buildings, as well as councils’ own housing stock, provide opportunities to develop innovative energy efficiency programmes and generate significant cost savings for councils.

Improving energy efficiency in private rented homes will be important in delivering net zero. Local authorities have the power to enforce Minimum Energy Efficiency Standards (MEES) in the private rented sector which makes up 19% of housing in England, a sector traditionally performing poorly on energy efficiency standards.

However, with local councils severely hampered by funding and capacity constraints, we are worried that MEES are not being properly enforced. The Government ought to ensure that enforcement is fully funded at the local authority level. This means either providing a central allocation of funding specifically for building enforcement capacity in local councils, or by overseeing a cost-neutral means of enforcing the standards, such as through the charging of non-compliant landlords.

Procuring projects in a way that focuses on quality and long-term value rather than just minimising costs

Effective public procurement prioritises good design outcomes and can maximise the social, environmental, 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.

Government and local authorities should take an outcomes-based approach and invest in the right design skills, briefing and design process when setting project budgets and fee levels. Consultants should not solely be appointed on the lowest fee, as they may not be able to properly resource the level of service required. This can lead to low quality outcomes which do not deliver long-term value to the taxpayer.

Ensuring value for money through Post Occupancy Evaluation

It is vital that building owners and users gain a better understanding of how their building performs compared to the design intention with POE. Even when a building’s design has energy efficiency at its heart, the promised energy efficiency standards are not always met.

POE informs building users if their building is energy efficient and reveals if it is being used as intended. It also allows for continuous improvement within the construction industry as it provides information on how a buildings design could be improved. This allows architects to help modify and alter spaces that are not functioning as expected or in accordance with actual needs and ensures value for money.

The data gathered from POE can inform the design and construction of future projects. This reduces the need for adjustments once a building is occupied resulting in lower costs. POE provides invaluable feedback and lessons learnt that all involved can take forward into their organisations and to their next projects. Local authorities should mandate the use of POE, and data sharing, on large scale housing schemes by making it a requirement through the planning system.

What should government's analysis of net zero funding to local authorities focus on in the next Spending Review?

Previous Government policies, including the Green Deal, have not been successful at incentivising homeowners to improve the energy efficiency of their home. This is for several reasons, including high interest rates and homeowners not being convinced to improve energy efficiency based on energy bill savings alone. The start-stop nature of funding for energy efficiency improvements, which has been the norm to date, has also not helped the situation.

Therefore, we need a long-term plan and investment programme for upgrading the energy efficiency of our housing stock, a National Retrofit Strategy. Such a strategy would need to be based on substantial and sustained government funding. The RIBA is calling for the £9.2 billion pledged for retrofit in the Conservative manifesto to be brought forward over the next five years.

Local authorities should also be empowered to use taxes, such as council tax, to incentivise private owners to retrofit their home.

What role can local community groups play in helping local authorities achieve their net zero ambitions?

Local authorities can play an important role in providing advice and information for residents and businesses on energy efficiency and low-carbon heating options. Raising awareness of the transition to net zero needs to be undertaken in sequence with practical support and options for action, so that people are supported. Local authorities must work with delivery partners and community-based organisations to promote what works locally.