



## Open Letter to Secretary of State

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23 October 2020

Dear the Rt. Hon. Robert Jenrick MP

We write to offer our feedback on the proposals in the 'Planning for Future' white paper on behalf of UK Architects Declare. Our initiative comprises more than one thousand UK Architecture practices, whose role in implementation of the proposals will be hugely important.

With some significant reservations, UK Architects Declare broadly welcome the 'Planning for the Future' white paper and see the review of the current planning system as an important opportunity to help move the UK towards zero carbon although, as we stated in our letter to the Prime Minister, we need to 80% reduction by 2030 and absolute zero by 2040. The planning system is integral to safeguarding the quality of our built environment now and for generations to come. The construction sector currently accounts for 40% of UK greenhouse gas emissions, so there is huge potential for the right planning guidance to help support a greener, more resilient future.

We believe many 'Planning for the Future' proposals have the potential to help combat climate change, improve biodiversity, support sustainable growth across the country, and deliver opportunities for UK businesses to innovate. There is however, a clear need to develop significantly more detail to support the proposals in order to ensure this is achieved, and to avoid unintended negative consequences. We hope that UK Architects Declare and other industry leading initiatives (such as ACAN, LETI, the Edge and the UKGBC) as well as a diverse range of professional bodies will be consulted closely throughout the reform process. This will help to ensure the detail of the proposals reflect the best practice in the construction industry and beyond. This letter covers some of the areas we see needing further development, as we felt there was insufficient opportunity within the consultation.

We understand the need to streamline processes and ensure consistency in how we define sustainability nationwide but question whether a 'single sustainability measure' could provide an adequate solution. Crucially more detail is required around the definition of sustainability to ensure that it is sufficiently broad; covering energy, whole life carbon, resource use, biodiversity, ecology and social equity.

We support the introduction of a more data based, digital approach to planning as key to establishing science-based targets to avert climate and ecological crisis, and hope that any definition of sustainability would be informed by science.

In order to meet the multiple challenges facing the planning system today we believe this proposal also needs more integration with other developing documents such as the Environment Bill 2019-2021. This may take the form of a series of key metrics shared between the such documents in key areas (air quality, water, biodiversity, resource efficiency, etc.). We believe that these not only represent a health focused approach to planning, but also form part of what makes a place beautiful.

It is important to remember that 80% of the homes that will exist in 2050 are already built. Guidance needs to be established to ensure that all buildings, even those that are listed and protected, will be levelled up to help the UK on its path to a net zero carbon future. We believe that this is where design codes and guides could have the most benefit, in ensuring the necessary retrofits of our existing built environment are delivered to be high quality and of high social value. The UK's trailblazing research into modern methods of construction would be of particular use here, alongside whole life carbon assessments. The retrofit of existing buildings is also of vital importance in safeguarding the wellbeing of future generations in the UK.

We believe that the promotion of stewardship of biodiversity is key to building resilience to many of the impacts of climate change, and has many associated benefits for the health and wellbeing of local people. We are already encountering the impacts of the climate emergency (flooding, summer heatwaves, droughts) so it is vital that in the coming decades the planning system facilitates climate change mitigation best practice. We see insufficient development in the white paper around the protection of biodiversity and the potential for nature-based solutions to help mediate the impacts of climate change. The role of tree planting and the interrelationship to the England Tree Strategy outlined by DEFRA should be seen as part of the planning strategy for the built environment too.

We are particularly keen to see a more detailed strategy for the practical implementation of changes to planning which 'bring forward proposals that are beautiful and enhance the environment'. These proposals must reflect the changing needs of UK citizens, and also the imperative to live within our planetary limits. Fundamentally we believe that the overall target of these reforms should enable a Zero Carbon UK by 2040, and to enhance biodiversity. Any proposals which are in conflict with this should be prohibited from any form of fast-track.

Strategic planning can help enable the general public to adapt their lives to a changing climate. For example, in establishing zones for development, plans will need to facilitate active modes of travel (walking, cycling, scooting, running) and renewable powered public transport as a priority. Positive, holistic aspects of local planning (such as community renewable energy supplies and sharing/reusing schemes) should not be underestimated, and the current ability for local authorities to act as pioneers and innovators is a strength we are keen to see continue.

As outlined, UK Architects Declare are keen to support the MHCLG with ensuring the Planning for Future proposals as they are developed will help us to deliver on our climate commitments. Our members are engaged in world leading research into ways to help avert the climate and ecological crisis. This reform is an important opportunity for us to work together to ensure the planning system reflects industry's best practice, and help upskill the UK construction sector for a green recovery.

We are ready to help you accomplish this urgent transformation. Only then can we meet our collective responsibility to the future generations from whom we are now borrowing.

Yours sincerely,

The Steering Group of UK Architects Declare

\* UK Architects Declare has over 1000 UK signatories, and has initiated a global movement with over 5000 multi-disciplinary companies worldwide under a broader umbrella of Construction Declares. See more at [constructiondeclares.com](https://www.constructiondeclares.com)