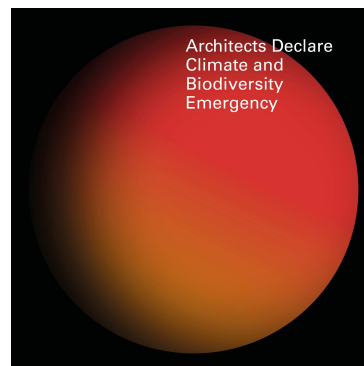


## Planning for the Future UK Architects Declare response

29th October 2020



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### Foreword

#### UK Architects Declare - overview

UK Architects Declare represents over 1000 UK Architecture practices who have declared a climate and biodiversity emergency. These include all of the UK's Stirling Prize award-winning practices, and most of the largest UK architecture companies, as listed in the AJ100.

This initiative was founded in May 2019, and is continuing to increase in scale and relevance in the Architecture profession and construction industry at large. Our signatory companies are collectively working to mitigate the impacts of our profession on planetary systems, and all of these signatories have committed to doing so in line with 11 commitments. You can find a full list of signatories and the declaration commitments here: [www.architectsdeclare.com](http://www.architectsdeclare.com).

Architects Declare has grown organically from this UK based initiative since Spring 2019 to become a global, multi-disciplinary movement with over 5000 signatory companies worldwide. This is vital, as globally the construction sector and the built environment accounts for 40% of carbon emissions, and so the construction sector needs urgent shift towards regenerative practices. You can find out more about Construction Declares here: [www.constructiondeclares.com](http://www.constructiondeclares.com).

#### UK Architects Declare consultation response - introduction statement

UK Architects Declare in general welcome many of the overarching aims set out by the Planning for the Future white paper - for more transparency, for net gain and not net harm, for more agility in the planning system. We too agree that '**planning matters**' and we regard the planning system as an important safeguard for protection of the environment, and for assurance of the quality of what is constructed in the UK. The shift towards emphasis on quality of design, and incentivising high quality new homes and places is positive.

The UK Government declared a **climate emergency** on 1st May 2019. These planning reforms are an opportunity to live up to that declaration, but there is very little in the proposed reforms that is truly commensurate with the **scale and urgency of the challenge**. While we recognise that 'Planning for the Future' does reference combating climate change, improving biodiversity, supporting sustainable growth in all parts of the country and delivering opportunities for the construction sector, there is no mention of the climate and

biodiversity emergency within this paper, and insufficient attention paid to the wider environment and impacts of the construction sector and built environment. There appears to be insufficient understanding that issues of climate breakdown, biodiversity collapse, obesity, social isolation / loneliness, air quality and the risk of future pandemics are interrelated and need to be addressed **systematically**. The UK construction industry has shown that it already has systemic solutions that would address all of these issues while improving wellbeing and saving money in the medium to long term. For these solutions to be implemented on the scale required we need the right market conditions and the right national and local governmental policies. We would like to highlight that many other prominent groups and institutions in our industry have raised sustainability as an area in need of improvement in the proposals too, including the RIBA, CIBSE and ACAN. We would like the Minister to commit to consulting with Architects Declare and other industry leaders to ensure this is addressed.

Therefore, while we feel able to, with reservations, broadly support many of the objectives at a high level, we feel that there is **insufficient detail** of how the proposals will be delivered to mitigate the climate emergency and meet our climate and environment commitments for us to give our full support. Therefore UK Architects Declare have adopted a 'not sure' response to many of the questions in the consultation. We see that there could be unintended consequences arising from the proposals and the definitions, so we have tried to outline constructively how we see the proposals working as far as possible.

We outline below a number of further comments, that we don't feel the consultation adequately addressed in its question format:

- It is important that any definition of what we mean by 'beauty' to be will incorporate wholly into that definition the importance of a **thriving, healthy environment for people to live and work**, so the desire for the changes to planning to 'bring forward proposals that are beautiful *and* enhance the environment' (emphasis ours) is a really important aspect we would like to see more detail of the intention for practical implementation of this.
- Architects Declare generally support the proposals for a more **streamlined, agile set of local planning requirements**, with the ability for local plans to be implemented faster. The climate emergency is an immediate problem that we are already encountering the impacts of here in the UK (flooding, summer heatwaves, droughts) and so it is important that over the next century the planning system is able to adapt quickly to emerging scientific guidance and construction industry best practice.
- 80% of the homes that will exist in 2050 are already built (according to the UKGBC). The planning system and local codes will need to ensure there is provision for the necessary **retrofitting** of existing building stock to reduce energy consumption. This may involve external insulation to properties in conservation areas, introduction of technologies such as photovoltaics and ground source heat pumps, and replacement of glazing to the highest standards. Guidance needs to be established to ensure even our listed and protected buildings can be levelled up to meet industry standards and help the UK on its path to a net zero carbon future. We see demolition to be a last resort, and applications should be made for permission to demolish to discourage this where possible.

- The homes and buildings that are built in the next decade will serve a generation likely to live beyond 2100. What is built will need to be resilient to a changing climate and support changes to ways of living in-keeping with our planetary limits. There is a **duty to future generations**, as changes to the planning system undertaken in 2020 will result in built environments needing to support a thriving healthy way of living into the next century, as most buildings will be expected to stand for upwards of 60 years, and in some cases over 120 years.
- The **single sustainability measure** referred to in the white paper seems potentially positive. Again, there is limited detail on what this means, and how it will be implemented, so we remain cautious in lending full support. The single sustainability measure will need to be robust and incorporate best practice guidance the construction industry is producing. It will also need to address sustainability holistically, incorporating resource scarcity, biodiversity and ecology and social equity related impacts, not only energy and carbon.
- Achieving **net gain and not net harm** is a really important aspect of the proposals, of which we support. However, there is no real clarity of what will replace Environmental Impact Assessments to give an assurance of this. We would strongly advise against a national or regional average baseline, with local granularity of approaches needed.
- The definition of the proposed **zones** will need to carefully consider the environment and not land value and development potential alone. For example, brownfield land is often rich in biodiversity and ecology terms, having been left without human occupation, while there are areas in the green belt that can be considered ecological deserts. Pre-conceptions about land and its role in the climate and biodiversity crises we face need to be avoided where not based on scientific evidence, and expert input from ecologists, architects, environmental experts must be incorporated in making plans for development areas to avoid unintended consequences.
- More robust and more strategic consideration of **active travel and energy use** in operation is needed in zone allocations, including the provision of public transport, walking and cycling links. A mix of uses must be integral to planning of zones, as this to avoid creating large single-use areas (e.g. housing) without sufficient access to necessary infrastructure and services, with knock-on detrimental effects on transport, health, and the local economy.
- As outlined in our letter to Government earlier this year with regards to a **green recovery**, we see the potential for a **resources and skills strategy** in the built environment and construction industry as an important part of a green recovery. We therefore support the intention of a resources and skills strategy for the planning sector. We recommend that this should support the delivery of regenerative, net zero carbon places, and that this should extend to retrofit of existing building stock, plan-making, development of design codes and of design review panels or their equivalent under the new system.
- There needs to be **ongoing monitoring of the performance** of the changes resulting from these changes to the planning system against UK carbon targets and other environmental commitments, to ensure the UK is on track to be world-leaders in mitigating the climate emergency. This could include data disclosure for built projects to better address the well-known performance gap in operational carbon, and the less well established performance gap on whole life and embodied carbon.

## Planning for the Future - UK Architects Declare full response

### 1. What three words do you associate most with the planning system in England?

*We have recommended that our signatories respond with their own local experiences.*

*Architects Declare in general see the planning system as an important (1) **Safeguard** to ensure the built environment is designed within planetary boundaries. We see that the planning system can be (2) Outdated, not reflecting the industry's recommendations for best practice in designing in a (2) **Climate and Biodiversity Emergency**. We see the planning system to be a place where there is room for local regions to become (3) **Pioneering** innovators, leading the way for the rest of the country to advance its efforts to meeting climate and biodiversity commitments, for example councils in Nottingham, Bristol and London.*

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### 2. Do you get involved with planning decisions in your local area?

*[Yes / No]*

*We have recommended that our signatories respond with their own local experiences.*

2(a). If no, why not?

*[Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify]*

*We have recommended that our signatories respond with their own local experiences.*

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### 3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?

*[Social media / Online news / Newspaper / By post / Other – please specify]*

**Other - Please Specify**

*UK Architects Declare supports the introduction of a more data-oriented, digital approach to planning.*

*It is vital that information becomes easier and clearer to access to allow for better public engagement and consultation. A streamlined, digital system is welcomed, the use of more visual plans and interactive and accessible map-based online system is encouraged. We see opportunities for a centralised dataset that can contain inter-departmental mapping such as DEFRA's environmental, biodiversity and ecological mapping data to inform planning decisions.*

*UK Architects Declare overall vision is to have a transformed built environment - planned, constructed and operated within planetary boundaries, delivering positive social impacts for all. We recommend Planning Decisions and affiliated material, remain as accessible as possible to all. Digitalising will of course allow greater distribution to some residents and relevant stakeholders. However it is imperative that planning notices and decisions remain accessible to lower income stakeholders.*

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#### **4. What are your top three priorities for planning in your local area?**

*[Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other – please specify]*

#### **Other - Please Specify**

*UK Architects Declare has recommended its signatories to respond based on local circumstances and experiences.*

*UK Architects Declare in broad terms acknowledge the twin crises of climate breakdown and biodiversity loss as the most serious issues of our time. Buildings and construction play a major part, accounting for nearly 40% of energy-related carbon dioxide equivalent (CO2e) emissions whilst also having a significant impact on our natural habitats. The UK Government declared a climate emergency on 01.05.19. These planning reforms are an opportunity to live up to that declaration, but there is very little in the proposed reforms that is truly commensurate with the scale and urgency of the challenge.*

*There appears to be insufficient understanding that issues of climate breakdown, biodiversity collapse, obesity, social isolation / loneliness, air quality and the risk of future pandemics are interrelated and need to be addressed systematically. The UK construction industry has shown that it has systemic solutions that would address all of these issues while improving wellbeing and saving money in the medium to long term. For these solutions to be implemented on the scale required we need the right market conditions and the right national and local governmental policies. Local policy can only go far to resolve these issues - we need joined-up legislation on a national scale.*

*There needs to be a pathway to full decarbonisation of the built environment. Local planning should firstly prioritise that that all new developments including homes, schools and workplaces should be net zero operational carbon developments, i.e. should not burn fossil fuels, should be 100% powered by renewable energy, with high fabric performance. We need to also accelerate the shift to low embodied carbon materials in all buildings, and move towards a future with whole-life carbon impacts within planetary limits.*

*Our built environment needs to become regenerative. Net biodiversity gains must be prioritised alongside decarbonisation. Nature-based solutions offer multiple co-benefits including resilience, flood mitigation and health and wellbeing benefits. UKGBC's recent 'Nature-based solutions to the climate emergency: The benefits to business and society' gives further detail.*

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**5. Do you agree that Local Plans should be simplified in line with our proposals?**

*[Yes / No / Not sure. Please provide supporting statement.]*

*Not sure. More detail is required. UK Architects Declare agree with the broad principle of simplifying Local Plans, we would like to engage with MHCLG in developing the detail of how this is to be achieved while observing the Climate Change Act.*

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**6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?**

*[Yes / No / Not sure. Please provide supporting statement.]*

*Not sure. More detail is required. We would like to engage with MHCLG in developing the detail of how this is to be achieved while observing the Climate Change Act.*

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**7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?**

*[Yes / No / Not sure. Please provide supporting statement.]*

*Not sure. More detail is required. Particularly, further details on the scope of the new sustainable development test would be welcomed. It is difficult to answer this question without knowing what exactly the new consolidated test would consist of in its final form.*

*Of fundamental concern is the definition of sustainable development on which this test will depend. This definition will need to sufficiently address the UKs legally binding climate commitments, with minimal levels of performance for all new development to meet in terms of carbon emissions, biodiversity, climate resilient settlements and social outcomes.*

*A consolidated test might be constructive in negating any 'doubling-up' and reducing the time taken to assess a local plan for its suitability. However a 'slimmed down' assessment would still need to ensure that any new plan still meets sufficiently demanding targets in all areas and was supported by robust and credible evidence.*

*The part of the current test which compares proposals against alternatives also seems essential to ensure the best approach is adopted. An additional consultation should be undertaken before any such test is put into practice*

*The consideration of sustainable development should be prioritised within future locals plans given the proposals within the white paper for an area-based planning system where automatic outline planning permissions could be granted.*

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**7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?**

*It is not possible to deal with all environmental issues at the scale of a single local authority, coordination is needed around environmental issues such as flood zones, rivers, wildlife corridors and air quality. Infrastructure scale planning is needed for zero carbon transport, energy systems, housing infrastructure (e.g. community energy centres, allotments, recycling centres) and to encourage active modes of transport such as walking and cycling.*

*UK Architects Declare advises that unless there is a robust replacement for the formal 'Duty to Cooperate' there is a risk that environmental, conservation and transportation factors will not be adequately addressed. Currently the formal 'Duty to Cooperate' covers consultation from numerous pertinent stakeholders. This includes the Environment Agency, Natural England, Homes and Communities Agency and Integrated Transport Authorities all of whom make expert contributions, particularly when it comes to issues around biodiversity and the climate emergency.*

*Expert input does not only achieve better outcomes but also relieve pressure on workflows within the planning department. One alternative could be to place consultants from these agencies directly within the planning department, to facilitate quicker and stronger collaboration.*



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**8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?**

*[Yes / No / Not sure. Please provide supporting statement.]*

*Not sure. More detail is required. Further details would be welcomed on how housing target figures would be formulated if a standard method for establishing housing requirements was to be introduced. Whilst the Government could implement a standard method for housing requirement figures, ultimately UK Architects Declare believes that housing needs should be assessed and analysed by Urban Planning professionals, whilst also consulting local councils.*

*Nationally prescribed targets would need to consider future growth and planned infrastructure developments with a transparent methodology, that is developed with respect to planetary limits. This includes considering embodied and operational carbon associated with proposed targets against the UK's carbon budget.*

*Any targets should be developed together with local authorities and with respect to their carbon targets, at a granular level. The embodied carbon of construction materials needs to be taken into account as part of this. To achieve this, we need to level up UK manufacturing to meet National, Regional and Local carbon commitments and to support domestic supply chains.*

*All developments should be regenerative and achieve net biodiversity gains always. The densification of existing urban areas and brownfield land should be prioritised to reduce emissions and to leave land available for nature restoration. Brownfield land is often rich in biodiversity and ecology terms, having been left without human occupation.*

*Demolition in any area should be a last resort, and our existing built environment should be considered as a carbon store. We cannot afford to unnecessarily demolish and build anew. Demolition should require planning permission with whole life carbon analysis to justify it to ensure we do not needlessly waste carbon already sequestered by buildings.*

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**8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?**

*[Yes / No / Not sure. Please provide supporting statement.]*

*Not sure. More detail is required. Affordability and the extent of existing urban areas will likely form part of the indicators of the quantity of development to be accommodated.*



*The quantity of future developments should also be reviewed against local environmental conditions such as local water and drainage infrastructure, local biodiversity habitats, impact on air quality and other key local environmental indicators, as well as existing and proposed infrastructure, such as public transport, active transport connections and renewable energy supply systems.*

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**UK Architects Declare** elected not to provide guidance for questions 9 to 15, to focus our response on questions relating most directly to the remit of our declaration commitments. We would be happy to engage with the MHCLG on the details of their proposals in the future.

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**16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?**

*[Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify]*

**Other - Please specify**

*UK Architects Declare believes it is essential that the term ‘sustainability’ is defined in light of the climate and biodiversity twin crises. Before speaking about sustainability in local areas, there are a number of key factors that should be addressed nationally. Local sustainability initiatives must align with National and International climate and biodiversity commitments. UK Architects Declare would like to support MHCLG in developing their definition for sustainability and to ensure the UK is world leading in decarbonisation of its built environment.*

*We see a need to ‘think Globally, and act Locally’. To contextualise this standpoint, UK Architects Declare originated from 17 Stirling Prize winning architecture practices, and has grown to over 1000 companies in the UK who have aligned with our vision for how the industry needs to change, and making individual commitments to change the way we work. This has now grown to become a part of a wider initiative, Construction Declares, a global movement of over 5000 multi-disciplinary companies worldwide from the wider construction industry. We seen for ourselves how local initiatives have the potential to affect change at the scale needed to combat a global problem.*

*UK Architects Declare supports the sharing of knowledge of how to deliver, operate and maintain the built environment within planetary boundaries. International collaborations enable us to learn lessons that we can deliver on a local scale. Some of what we have*

*learnt so far is listed below:*

- *80% of the homes that will exist in 2050 have already been built (according to the UKGBC). Therefore prioritising retrofit is key to achieving 2050 carbon targets - we need to decarbonise our existing building stock. The demolition of existing buildings has a huge impact; in terms of embodied carbon, construction waste, and of course socially. It also affects the historic fabric of place. Demolition should therefore continue to require permission.*
- *All developments must be low carbon in real terms, and in net terms should be zero or net benefits. This should include whole life carbon (operational and embodied) in order for the planning system to have the greatest impact on helping the government reach its Net Zero 2050 target. There is an opportunity to embed carbon targets within the planning framework.*
- *We need to support restoration and net gains for biodiversity and support nature-based solutions as priority. We would welcome the creation of new wild areas, restoring peatland and sustainably managed forestry and improving the performance of our natural carbon sinks. Urban areas offer huge potential to support biodiversity and act as carbon sinks - according to Friends of the Earth 'there's less woodland cover in the Yorkshire Dales than in London, less in the Peak District than in Leeds, and less in the Lake District than in Sheffield'. As such the value green spaces in urban areas offer should not be underestimated. Refer to our consultation response for DEFRA's England Tree Strategy developed jointly with ACAN for more information, available at <https://www.architectscan.org/tree-campaign>.*
- *We need to ensure the way we plan and develop our built environments encourages people to lead sustainable, regenerative lives. This includes encouragement of active modes of transport through planning of streets and walkable neighbourhoods, participation in community allotments and networks for sharing and reusing products, and in engaging positively with community initiatives in their areas.*

*We see planetary and environmental health as interrelated and inextricable from social wellbeing and equity. The co-benefits arising from achieving these objectives can greatly improve quality of human life. Sustainable development facilitates the ability for future generations to thrive and lead healthy, productive, fulfilled lives.*

*We believe the UK construction industry has the tools, expertise and willingness necessary to achieve these objectives and be world leaders. We now need the support of central policy decisions to ensure we are swimming with, not against the tide.*

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**17. Do you agree with our proposals for improving the production and use of design guides and codes?**

*[Yes / No / Not sure. Please provide supporting statement.]*

*Not sure. More detail needed.*

*UK Architects Declare welcome the review of the Planning for the Future white paper as an important opportunity to help move towards UK net zero carbon emissions in 2050. It is important that the production of locally prepared design guidance should focus on climate change mitigation and adaptation following best practice principles.*

*A key factor in meeting the UKs carbon reduction commitments is the upgrading of existing buildings. Local design guides will be important to ensure this work is carried out in a sensitive, appropriate manner. Provision needs to be made for guidance for adaptation of existing building fabric to reduce energy use - e.g. addition of external insulation and new cladding, replacement of glazing, and incorporation of renewables. This guidance can be developed at a neighbourhood plan or individual street level.*

*This will support the expansion of a UK retrofit industry, and opportunities for the UK to lead in an emerging global sector.*

*Where pattern books and design guides are derivative of local vernaculars, due consideration should be made as to the social and climatic conditions those vernaculars arose. New developments fundamentally need to support technologies and standards of design that will help us to meet the Paris Agreement targets the UK has committed to. For example, the angle roof pitches will influence our ability to incorporate photovoltaics, and window size and distribution will be a huge factor in determining the fabric performance and passive solar strategies that buildings are able to incorporate.*

*The proposals for pattern books and aesthetic design rules will need to also incorporate industry best practice guidance such as established standards including Passivhaus, as well as innovative guidances arising directly from the Architecture and Built Environment profession, including the RIBA 2030 Climate Challenge and the LETI Climate Emergency Design Guide. This should avoid reinforcing the existing status quo, and instead help shape a future built environment that enables us to meet our climate commitments and to improve quality of life.*

*The incorporation of best practice environmental design approaches within any new design guides and codes will help to level up standards of construction across the UK, and reduce the impacts of the built environment on the wider environment.*

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**18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?**

*[Yes / No / Not sure. Please provide supporting statement.]*

*Yes, providing that this body and their resultant design codes acts to safeguard the quality of the built environment, ensuring the delivery of objectives outlined in our response to 17, then UK Architects Declare would support this.*

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**19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?**

*[Yes / No / Not sure. Please provide supporting statement.]*

*Not sure. More detail is required.*

*We agree that sustainable, net zero carbon designs with net biodiversity gains that promote healthy and socially inclusive communities should be prioritised by Homes England. Good quality design should be at the core of any housing scheme. If the planning system can support Homes England's to prioritise this within their objectives this would only be a good thing. If Homes England can be a successful test bed for providing high quality design whilst managing to deliver affordable homes then it could help create valuable benchmarks for the wider market. We welcome further details on how this is to be proposed.*

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**20. Do you agree with our proposals for implementing a fast-track for beauty?**

*[Yes / No / Not sure. Please provide supporting statement.]*

*No.*

*Sustainability and regenerative design principles cannot be overlooked for the sake of beauty alone. Good design is not solely determined by aesthetics, and we should be careful how we define what beauty is in a climate emergency. It is hard to determine how much quantitative metrics such as whole life carbon can be compared with qualitative assessments such as beauty, without seeing further detail.*

*We believe that the sustainability and suitability of a development should hold significant weight in the determination of an application, as well as the protection of our natural, built and historic environments. We are concerned that by fast-tracking beauty, this is not putting "sustainability at the heart of [...] proposals".*

*However, UK Architects Declare would welcome further details on the proposal for fast-tracking beauty and how this will still ensure necessary sustainable objectives outlined in our earlier answers are met.*

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**UK Architects Declare elected not to provide guidance for questions 21 to 26, to focus our response on questions relating most directly to the remit of our declaration commitments. We would be happy to engage with the MHCLG on the details of their proposals in the future.**

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