

# Population projections, revised NPPF, impact of inflation and embodied carbon

Account of Forum meeting on 12 September 2022 on Zoom  
Full minute by James Michell also at [planninginlondon.com](http://planninginlondon.com) > LP&DF

## TOPIC 1

London population projections from the census figures. Implications for planning - see leader in latest Planning in London at . Led by Lee Mallett with Wil Tonkiss and Lisa Fairmaner [Head of London Plan] of GLA.

Lee Mallett (co-publishing editor of Planning in London)

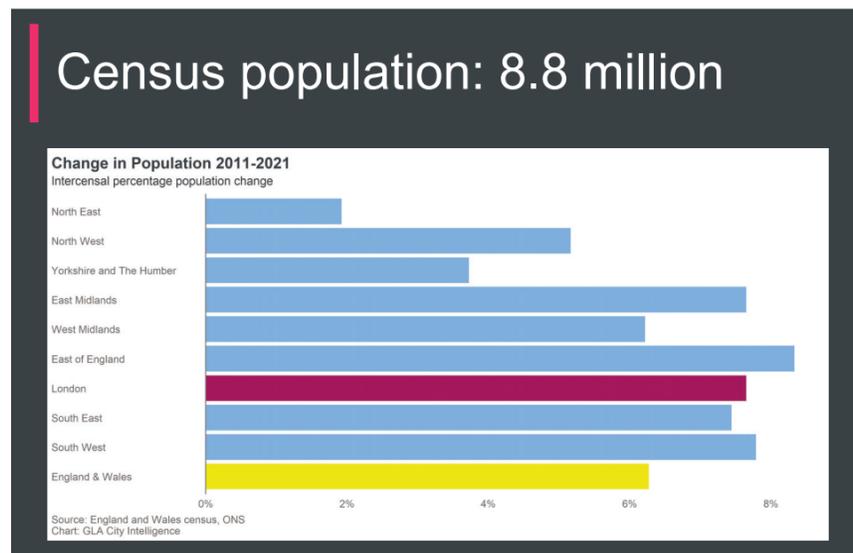
- Since the early 1980s until now, one of the biggest stories was the turnaround in the population statistics:

The city lost 540 000 people in the 60s, 750 000 in the 70s and since early 80s, the population number has risen consistently as revealed by the Office for National Statistics, from 6.6 million in the early 60s people to 8.8 people.

- The accuracy of the statics and what they really imply for the number of houses needed is hard to define. The figures continue to reveal that the population is still increasing, while there are not enough housing being built to match the figures, leading to a shortage of housing.

To what extent is the job of the planning system try to address this issue or the politicians should directly tackle the issue?

- The statistics also revealed an imbalance shift as people from center areas such as Chelsea, Kensington and Westminster had a decrease in population of 9.6 per cent, whilst places such as



Dartford, Tower Hamlets shown a 20 per cent increase in population – areas that also have a high score in deprivation.

Will Tonkis (Senior Data Scientist for City Intelligence Unit)

- WT area of responsibility is population projections –the data is used for the London Plan

- WT starts with the general context of what cen-

sus says and what it means for us. 8.8 million population now according to the census in London. The previous media estimated for June 2022 – (9 months before the census) - was 9 million.

The difference in number is part because the media estimate is wrong and part because of the pandemic effects. This period had the most population

## Meeting held on 12 September 2022 on Zoom

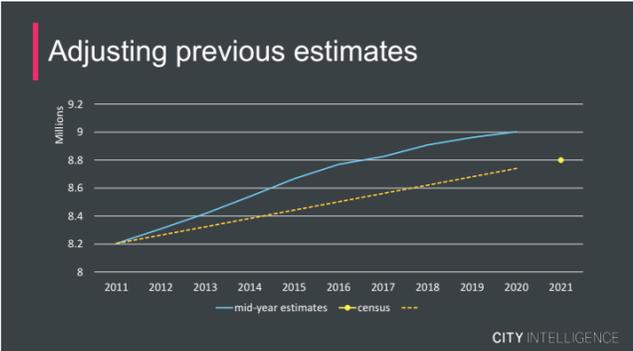
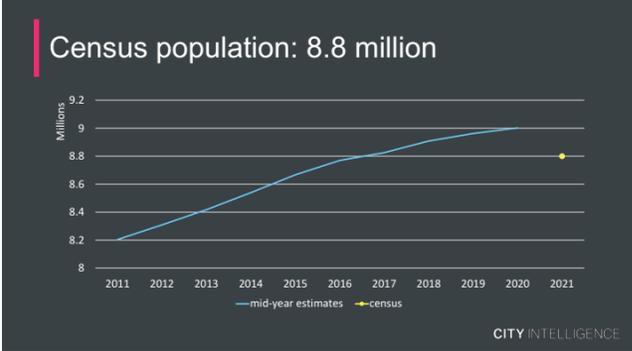
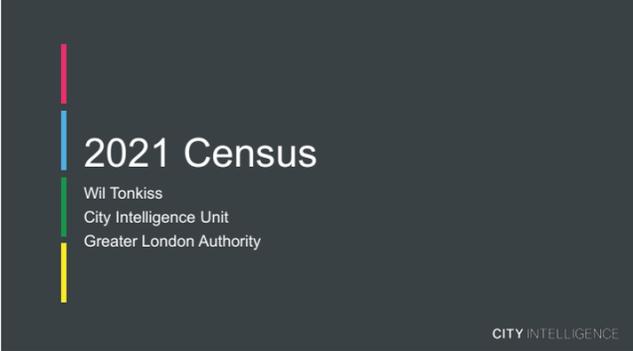
**Moderator**  
Brian Waters (BW)

**Speakers**  
Lee Mallett (LM)  
Will Tonkiss (WT)  
Lisa Fairmaner (LF)  
Steve Quartermain (SQ)  
Michel Bach (MB)  
Thomasin Renshaw (TR)  
Dr Riette Oosthuizen (RO) (Jt Hon Sec)  
Siobhan Cross (SC)

Nicholle Kingsley (NK)  
Peter Eversden (PE)

**Attendees** (as listed by Zoom)  
Nikki Linsell  
Paul Higgs  
Peter Stewart  
Stephen Heath  
Steve Norris  
Tim Wachter  
Michael Kiely  
Mark Willingale

Nigel Moor  
Andrew Rogers  
Anthony Carlile  
Brian Gatenby  
Deon Lombard  
Eric Sorensen  
James Mitchell (Jt Hon Sec)  
Michael Coupe  
NK Nicholle Kingsley  
Stefano Koryziss  
**Apologies:**  
Joanna Averley, Jonathan Manns (v-chair)



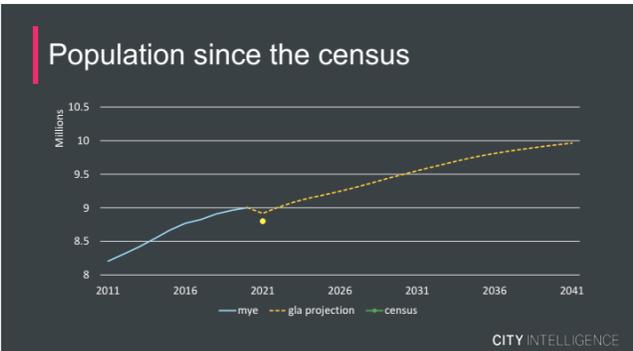
### Pandemic Effects

Census tells us what the population was on a single specific day

Census Day was 21 March 2021 when we were in Phase 1 of the 'Route Out of Lockdown'

This can be problematic because

- It doesn't tell us anything about how we got to that population
- The data gets used as a proxy for much longer periods – particularly once data are converted into rates



### Resources

- [Census First Release Summary](#)
- [Blog on how to interpret the census](#)
- [Census Pages on the London Datastore](#)
- email: [census@london.gov.uk](mailto:census@london.gov.uk)

change in movement.

- The census number is right and it is showing what the population was on the very specific day, specific unique time. How useful that number is for the next year is to be questioned.

How government use that number and how future projections in population incorporate the new census point into the data:

One of the first thing that happen after the census was to go back and check the changes in a decade and draw a line between the 2 census, understanding the reality of how the population changed over 10 years. This is then projected forward.

ONS (Office for National Statistics) plan is to produce the next subnational population projections in early 2024, while City Intelligence hope is to produce them manually by early 2023.

- WT shared screen showing diagram of the number of population since the census and the Greater

London Authority (GLA) projections.

Lisa Fairmaner (Head of the London Plan and Growth Strategies)

- The London Plan Population projections are crucial for the London Plan going forward
- The planning for London Programme: Discussions with a group of representatives across UK and their views of the future of London, picking up themes such as climate change, commercial opportunities, health, housing, and economic growth opportunities.

The Programme includes Talk London Work. The next phase is deliberative events and stakeholders events early next year.

- It is important to reiterate that any change will not be ready until next mayoral administration. The work is to identify challenges and potential options rather than coming up with what the next London Plan will include.

Demographic of the population projections – are

an important part of the process.

- Running alongside the London Programme, is the new Integrated Impact Assessment Framework (IIA) - literature baseline and information. Expected to have IIA scoping report available in the early new year to use as a framework to consider and assess all the options for the London Programme.

- Moving towards live digital SHLAA (London Strategic Housing Land Availability Assessment)

**Questions:**  
LM: How do you feel about previous census telling the population has increased by 600 000 in each decade but we did not build nowhere near enough houses? How do you see the plan addressing this issue.?

LF: We are not at that stage yet. We identify that London housing delivery has not kept pace and that London average occupancy rates have increased slightly, but we are not in the stage of putting for-

>>> ward what we might do to address that.

LM: Are you able to say how politicians might act to address this discrepancy?

LF: This will be a London Plan and we do not know who the political makeup will be. That is why is so crucial to take all the options that are put forward to us, assess them and identify the pros and cons. It will be up to the next mayor to look at all the policy leavers and create the London Plan.

BW: Property Week reports a study by Hamptons with the headline that 'inflation and flexible working push Londoners out of town' and they have a data on that. What extend is a permanent shift or a reaction to lockdown? What is your perception of your recent trends that might have been distorted or been missed by the census count in terms of the move out of London?

LF: There is a wealth of information out there about what is likely to happen. We will just be continuing to update the baseline that we are assessing against. We are still in a fluid situation at the moment.

WT: For the population data point of view – pandemic statistics are particularly timely. We do not know yet what the longer impact of pandemic will look like in a longer span of time. Looking at the jobs data by sector – during the pandemic a lot of jobs such as retail, hospitality disappeared but now they came back. There is a lot of data but it does not cover the whole piece. It is difficult to get a handle of what exactly is going on.

Eric Sorensen (EO): I am interested in population projection. Will's graph showing a dip and then an increase in population. I would be interested to know what that assumption was based on? The fact is that 6 years ago we were projecting a significant increase in young population and we build many primary schools. We now have many primary schools that are underpopulated by pupils. It is an illustration of how difficult is to make this projections.

One last point – a lot of the house developments particularly in the east London have been high rise residential developments. Talking with estate agents about who actually lives there you will notice that there are not standard families but tends to be short let, Airbnb, parking investment capitals. To understand how much housing we need, we must understand what is the mix of housing and who is living there to make any sense of the population and social requirements.

Steve Quartermain (SQ): Question for Lisa – given the change in the figures is there anything you feel you should do in the meantime to encourage the local boroughs to follow the higher figure in estimating the housing needs rather than the lower figure?

LF: We are not expecting to see a change to the role of the London Plan in setting and apportioning the housing targets across London local authorities. It

is an entirely separate question to how the London Plan understands the housing needs in the future and what the housing targets for each local authority should be.

Michael Kiely (MK): The number of houses needs is different than the rest of the country and it is based on capacity.

LF: Establishing the targets is made up of a whole host of very complex factors. MK is right the housing needs is based on capacity and not based on each individual borough need.

MK: The 300 000 figure is not a real figure derived by demographic, it is a political figure. We have the affordability equation – if you build more houses the housing prices drop down. There is no evidence of this. The actual housing needs is below that figure. Hopefully these changes will come from the government and will be addressed properly by looking at people.

Michael Bach (MB): The current situation will make the process even slower with the rise in costs, Brexit, inflation etc.

Short lets are now biting into the housing figures in some boroughs and it is higher than what is delivered. For the London Plan, we probably would end up with a negotiation figure of the number of housing needs and I think this is a more sensible solution.

LM: We need to understand how it is impacting on younger generation who are finding difficult to find affordable accommodation.

Thomasin: How much work has been done to underlines where the population projections come in terms of the household size and composition of household with the population changes? How we are using our housing stock? How the real demand is vs the usage vs the projection?

WT: It is partly to do with the population projection but it is also to do with the house hold projection model and it is based on census data 2001 and 2011 data. The question is if this is fit for purpose as you want to move forward?

TOPIC 2

**Changes to the NPPF: The promised update has been trailed but failed to appear before the Summer recess. What might it, should it contain? Led by Steve Quartermain of Town Legal (recently Government chief planning officer) Michael Bach and Peter Eversden of the London Forum of Amenity Societies.**

Steve Quartermain:

• 2.5 years later – Planning Bill – so much is not explained. As part of the things promised was an updated NPPF. A revision is long overdue. There are many issues that need to be addressed. It was not a detailed NPPF that was forecast but a perspective of what the revised NPPF might look like.

- National Development Management Policy

Some policies do not attract that much attention. The most comments received on policies are on allocation policies.

Michel Gove said there will be consultations on the policy. If that is the case then plan making would be a lot quicker, easier and cheaper if some of the policies would be banded as they were.

The policies in the NPPF should have the same status as in the local plan with legal backing.

Some of the other issues:

- SQ is expecting for the NPPF to be clearer on the climate change agenda, clearer about retrofit and how the planning system should be more supportive, expect to adjust some of the issues we discussed today.

-In terms of the government position – there is a 9 months to 2 years window of change – new Prime Minister, Prince Legislation etc.

-The context of the economic challenges, there are concerns about the housing number, questions about the Levelling Up Agenda? Investments zones and planning zones- does that address the levelling up agenda, the approach of green belts? All this gives a real opportunity to champion the NPPF.

There are things that you can change with immediate difference. There should be a specific change to paragraph 35 on examining plans –local plans and spatial development strategies to be constantly reviewed. Another change should be to paragraph 33 to keep plans rolling.

Michel Bach:

• MB was responsible for the proactive PPGs (Planning Policy Guidance notes) and PPSs (Planning Policy Statements).  
• The problem with the NPPF is that a lot is about process rather than policy. Policies need strengthening. Examples: policies to strengthen town centers; In terms of the allocation, before deciding on the right development for an area, it should be identified how the place will look like.

• The biggest problem – there is nothing specific about big cities and London. London Plan provide very specific policies which NPPF will never produce.

• GLA talking about the London Plan and about the bill and not about what is going on in London. London situation is extreme with land values, development pressure, housing pressure, social and community uses that need protection. Any development is usually at the expense of something else.

What is worrying is the status that National Development Management Policies would have – they would trump local plan policies. We should not discard the General Conformity principle where The London Plan has to conform with NPPF, and the Local Plan with the London Plan. You can

diverge from the other where it proves that there are local reasons.

- Another concern is the uncertainty about the future of the London Plan.
- Every chapter should have an introduction to make clear what is the purpose. The location development chapter (transport) is very weak. An important aspect is about strengthening local communities.
- A policy on tall buildings as in London Plan should be in the NPPF for all authorities
- A rethink of the content of NPPD and what it is about.

SQ: The government talked about National Development Planning Policies trumping the local policies if there is a difference. The issue is why would be a difference?

MK: National Development Planning Policies – the reason for having the same policies about different things is to give section 38.6 status.

We do not know what policies government will produce. It might be that the generic policies might not be appropriate on specific areas. It is necessary that if it is to depart from the policy, an inspector should check and fresher policies should be introduced to the specific areas and should carry weight

At the moment there is no freedom for local distinctiveness in the areas covered by NPPF.

NPPF is a mixture of policies and processes. There is a need to stand back and review all that; get all the policies in one document and all the procedures into a practice guidance.

Peter Eversden (PE):

PE view on National Development Planning Policies is that they should be like any other guidance and should have roots in NPPF. There should be a subject on which the guidance is given, not be

something special to determine if a planning application is approved or not.

Robert Jenrick interfered with the London Plan – after it has been inspected, he ripped and inserted parts of it on the basis that only if you do this he will allow the publishing, reflecting the government attitude towards London and its plan. Clause 85 of Leveling Up and Regeneration Bill threatens the London Plan.

The NPPF does not include many of the subjects the London Plan covers. There are different rules for what would you do, where. The government does not know enough about London to try to change. The NPPF should cover the subjects that needs guidance rather than impose them.

Nigel Moor (NM): Retired local planning, and retired local politician-

In the last two years, the politicians started to see planning as a toxic subject. We need to try and promote a much more bipartisan approach.

Brian Gatenby (BG): Practicing architect and qualifying planner.

Real world planning moves faster than policy. It is not new – planning has been described as a wobbly pillar from the first day. We should look more at implementation with a more focus on reality of how it works in practice.

BW: Looking at the practicality of the process – the development management process is drawing in the process of technical requirements which are demanded before even the planning application is refused. Anything measurable should be in the Building Regulations rather than planning.

MK: Agree with BW in large. There is only a need for 2 documents – a design justification, and the other document should identify the impact of the development. The documents should have a word

limitation. At the moment - trying to access all the documents is impenetrable. We should focus in justifying a good design and its impact assessment.

TOPIC 3

**Impact of inflation on London's housing supply Led by Thomasin Renshaw of Pocket Living and Riette Oosthuizen of HTA Design and BCIS (invited). SEE: Housebuilders costs up 15 per cent in last year - BCIS**

Thomasin Renshaw (Development Director at Pocket Living):

Cost of the planning application – is astronomical. TS supports the notion that if consent is not implemented it should be because of a problem and not reluctance to the delivery.

Pocket Living

- Focus primarily on delivering 1bedroom homes – (1 bedroom-1 person homes)
- Deliver all over London - 50 live schemes on different scales. Diversity of schemes.
- Smaller developers are feeling the sharp end of this - the contractors delivering under £10 million contract value are on the knife edge. The build cost inflation is higher than the smaller contract value
- Schemes:

*West Green Place in Haringey:* 98 pocket 1 & 2 bedroom homes, 12 pocket edition 2 bedroom homes and 16 family town houses and community center.

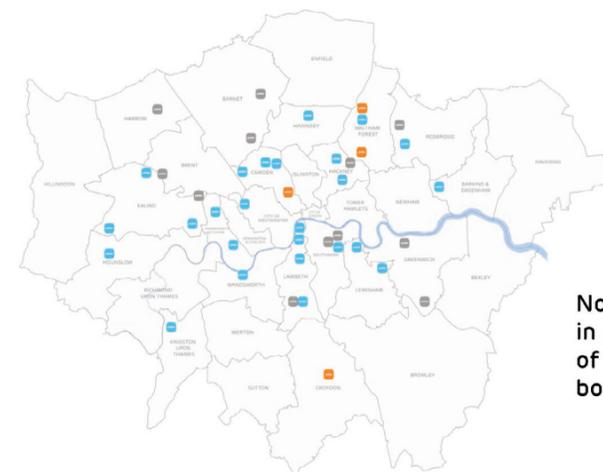
*Gainsford Road in Waltham Forest:* 45 - 1bedroom pocket homes.

- The current state of the industry:
- construction materials up to 23 per cent since August 2021
- cost of materials at a 40 year high.
- As a result there is a lot of insolvency, build cost inflation.

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## Who are Pocket?

- Only SME developer delivering DMS homes in the UK
- Our achievements:
  - Almost 1,000 affordable homes delivered across 25 completed sites (<1ha)
  - Over 1,500 homes currently in planning or under construction



Now operating in over 65% of London's boroughs



## Our developments

### West Green Place N17, Haringey

**Previous owner:** Haringey London Borough Council

**No of Homes:**

98 Pocket one and two bedroom homes  
12 Pocket Edition two bedroom homes  
16 family town houses

**% Affordable:** 86%

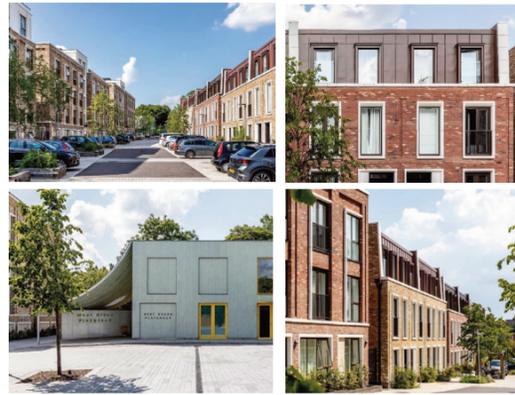
**Previous use:** Brownfield

**Other features:**

New community centre and nursery designed by Dyvik Kahlen Architects, built using a CLT modular system

**Awards:**

1 (winner) Planning Awards 2022, 2 (highly commended) British Homes Awards 2021, New London Awards 2018



pocket living

• Alarming signs for housing delivery –the graph shows the number of affordable housing in 22-23 decreased exponentially in 10 years.

• There are many construction insolvencies with 213 construction firms becoming insolvent in June alone. It makes up a 5th of all insolvencies.

As an example – on one of the schemes the contractor became insolvent. The project had to be retendered increasing the bill of the scheme by 30 per cent. There was no profit from the scheme.

• The developers profit margins has been impacted by the build cost inflation. You need a higher profit margin at a time that is particularly risky, but what it happened is that the profit margin is squeezed. Very challenging for a market that invested heavily to get a planning consent.

**Dr Riette Oosthuizen** (Planning partner at HTA Design LLP)

2007 - Established a planning consultancy within the practice

• HTA multidisciplinary practice specializing in house delivery and place making.

• Deliver schemes of all sizes- infill house delivery, 70 per cent of the clients are local authority.

• Schemes:

*Joyce and Snells Estate, Enfield* - regeneration scheme. Looking at reshaping a place at this scale is affected by a number of different phases. The project is in planning stage and will be delivered in the next 20 years. With the current market there are some challenges to think about as funding plays an important part in the project.

*Islington* is one borough that HTA Design works closely with- 30 schemes that are build or in the process of being build. The projects cover different scales trying to tap every single space that can be used for additional housing. Most projects are delivered innovatively and because it is local authority driven they have a high-quality architecture.

*Vorley Road, Islington* – utilizing a small site to provide 72 new homes and a new library and a GP center.

Local authorities can drive contextual development. It is important to have enough evidence based so you can envisage how the borough will look like in the future.

*A number of small Enfield Infill Projects* - with Peter Barber and the council

*Tallest Modular Tower in Croydon*

• Construction cost inflation and housing delivery, a summary:

- Uncertain and volatile market: Brexit, Covid, Ukraine – Russian War

- Volatility in the housing market based on a range of issues from debt exposure, mortgaged to grant availability, land and planning, labour and skills shortages. The market has proven historically to be resilient; will it be again?

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## Our developments

### Gainsford Road E17, Waltham Forest

**Previous owner:** Waltham Forest London Borough Council

**No of Homes:**

45 one bedroom Pocket homes

**% Affordable:** 100%

**Previous use:** Brownfield

**Other features:**

The design has been influenced heavily by the legacy of William Morris.

**Awards:** 3 (shortlisted) Waltham Forest Design Awards 2021, AJ Architecture awards 2018 and The Brick Awards 2019.



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## The current state of the industry

### Choppy waters ahead

Construction materials up by 23% since August 2021

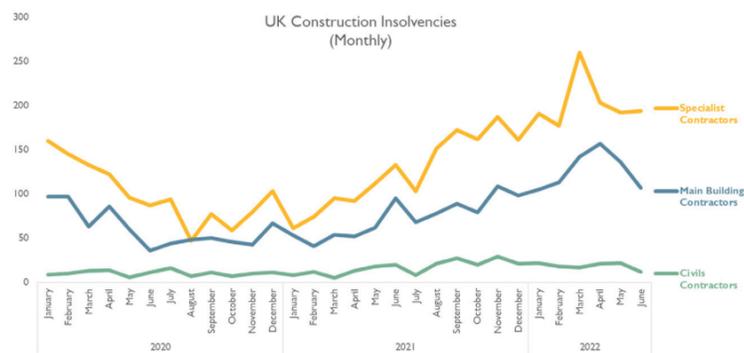
Cost of materials at a 40 year high



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## Insolvencies rising



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## Alarming signs for housing delivery



■ GLA housing starts \* Based on 1<sup>st</sup> quarter projections

- Construction Products Association market impact analysis July 2022: construction output forecast to rise by 2.5 per cent in 2022 and 1.6 per cent in 2023. Strong growth in warehouses and infrastructure offsets, but slowdown in private housing and fall in private housing repair, maintenance and improvement.

- Material cost inflation is acutely felt: the Construction Leadership Council reports in June 2022 that inflation of around 23 per cent has been typical for construction products and material in year.

- Regulations changes – decarbonization and ventilation – to help UK reach 2050 net zero targets are increasing cost on projects.

- Cost of constructing labour (ICMS data) avg cost of construction labour, including skilled and unskilled has reached 33.60 pounds in the UK. Green collar installation operatives – high demand and low supply – installing renewable energy infrastructure – command rates of 52 pounds per hour.

-Balance of project viability considerations are shifting.

- Inflation potentially impacts on social outcomes and not just project delivery.

### Experiences from Practice

- Developer forced to renegotiate affordable housing levels with the Local Authority as a result of inflated tender return from contractor

- Major developer in talks with the London Local

Authority about concessions that will be required by them to move their predicted return from what is now down at 12 per cent back to the 'Broad approved' 15 per cent margin.

- Infill estate regen project now in 4th year post planning struggling with delivering different elements of the scheme. Had to be rephrased and was subject to various post planning changes. The original contractor pulled out. A further contractor is on board but the scheme is struggling to get off the ground, due to brick and window prices. Compounded with issue of costs is supply chain.

- Local authority, the client, reaction – as much certainty on design detail that is affordable at current prices as possible, leading to difficult discussions

with planning officer about the quality of design, and leading to extreme project delays.

• Solutions

- supply chain resilience, project resilience and project optimization, team culture and leadership and management. (Arcadis, 2022)

- need for greater collaboration between all parts of housing delivery – including earlier selection of contractors and MMC providers and also longer-term relationship to avoid transactional approaches that will create cost spikes.

- Clients driven by 'patient capital' in the BtR and PBSA sectors. They currently continue to invest in housing.



# Joyce and Snells Estate, Enfield



## Awards



Planning Consultancy of the Year (2022)



Award for fostering a diverse planning team (2020)



Award for Affordable Housing (2019)

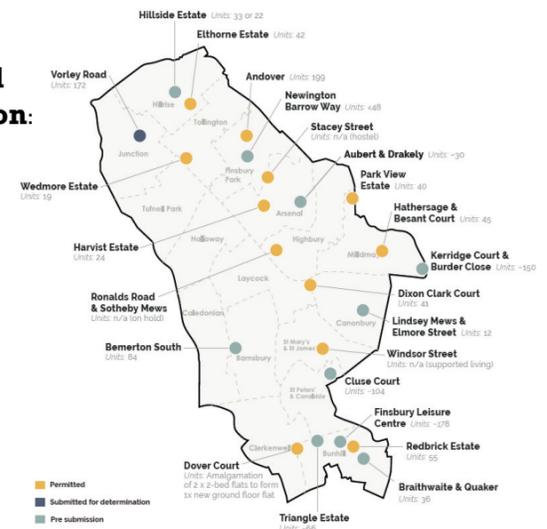


Planning Permission of the Year (2019)



Excellence in Planning for Homes, Small Schemes (2018)

## Complex infill across Islington: small sites and estate regeneration



### Vorley Road, Islington



72 new homes	1561 sqm new library and medical centre	11 new trees	0 net zero carbon	173 new bike parking spaces	0 Car Free
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### Kings Square Islington



### Enfield Infill Projects (Peter Barber), LBE



#### >>> Questions

BW: The design might be correct at planning application stage but then value engineering comes on and cheapens the design. Does it suggest that people are building things that would have not gotten planning permission?

RO: We would not want that. The desire is to

always deliver the best quality design and that is why it is the discussion to keep the design team involved at all stages.

What often happens is planning application are broken down in smaller components. During that stage problems creek in.

MC: When working for LB Croydon, we put in

Clause 106 that the architect had to be retained as an executive architect to ensure the design was delivered and it was interesting to see the developers who welcomed that and who resisted it.

TR: Coming back to Impact of Inflation on London Housing Supply - interested to get people responses and what we can do about that? Housing

delivery will skyrocket and what we will see is that developers will reduce the affordable housing. At the moment Section 106 negotiations is not more flexible than it was 5 years ago. Is it perhaps something that we should look at? Are the local authorities understanding of what is going on right now?

LM: The whole viability situation is designed to

try to accommodate some of these difficulties. It is a fierce, expensive negotiation.

I don't think that the system will immediately going to help stop the delivery figures from falling. I think what it is needed is a reappraisal of the realism of the high affordable housing requirements within the commercial equation of most developments.

To achieve the quality that is necessary, Local Authorities, are trying with Section 106 to attach monitoring in order to ensure the quality of design is not eroded because of the viability issues TR is describing.

TR: I will challenge this - in order of the architect to be able to monitor, the schemes have to be deliv- >>>

>>> erable. TR is not sure if it is the right solution.

LM: If it is not viable it will not be built.

TR: That is the issue. It takes a while for people to understand how deep the issue is before having a constructive discussion. What can we do to escalate this – we should learn from the mistake of delaying the response and respond faster this time.

LM: Whole idea of community infrastructure level was to try and remove doubt and uncertainty intruding in the planning system.

RM: The whole process is moving too slowly because this is fluctuating all the time. Some of the projects were viable at the planning stage and then a contractor comes on board. The client is surprised by the price inflation of the contractor. The next thing is about the delivery of the phase one, when suddenly the price of materials is higher or the materials are not available, having to go back to the design and make changes to the scheme.

There is a reality at the moment that makes the delivery of a project very difficult.

MW: I think we need a much greater tolerance of planning conditions.

BW: I wonder whether a moratorium of affordable housing tax for a limited period would bring forward more schemes, especially for independent smaller house builders. This might bridge the gap.

TW: There is a misunderstanding. Affordable housing and their payment come from the land value, not from developer profit.

Having experience the previous attempts of taxing betterment, they were all totally not comprehensible. The benefit of the existing system is that each site is independently measured. If it is up to the national tax- when it gets down to the more detail -it will become very complex.

TOPIC 4

**Embodied carbon: the implications for planning policy and the risk that long-term energy savings in modern construction will be lost to short-term retention of old structures.** [Follows on last Forum discussion between Lichfields and Fred Pilbrow, the architect of the M&S scheme in Oxford Street, on the issue of embodied carbon, and demolitions versus development] - see PiL issue 122].

Led by Nicholle Kingsley and Siobhan Cross of Pinsent Masons

This is a follow up of a discussion from UCL at the last forum, where Fred, the architect of M&S in Oxford Street explained that they spend 9 months trying to make use of the existing structure and finding that they could not.

In London, nearly every site for development has an existing building. Will it be the death of any new buildings because of the embodied carbon?

Siobhan Cross (Pinset Masons - Real Estate Dispute Resolution Layer)

• Context – climate change act 2008, legally binding UK targets to hit net 0 by 2050, to achieve a 78 per cent reduction of carbon emission by 2035 and by 2030 we need to achieve a 60 per cent reduction.

• June, 2022 CCC latest Progress Report – 47 per cent reduction achieved (excludes UK consumption emissions); 4 per cent increase emissions against 2020;

Progress in manufacturing and construction hard to ascertain due to poor data;

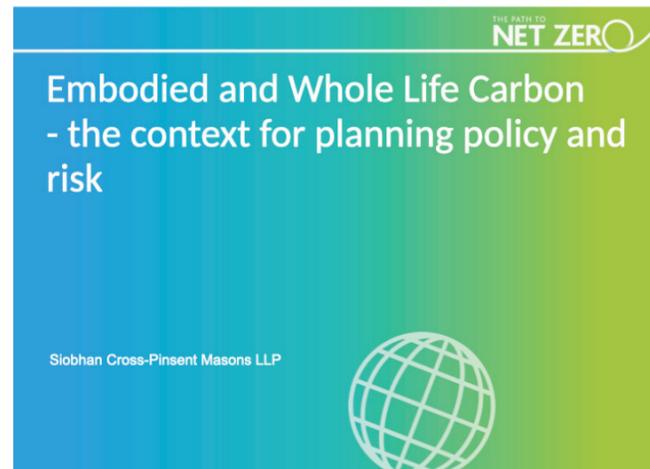
Calls for plan to mandate WLC assessment of buildings by 2025;

• Buildings 25 per cent of UK emissions to buildings and manufacturing/construction 14 per cent of total emissions

• Definition of whole life carbon emissions – everything from construction, manufacturing of the raw material, transport, construction site energy use, during life and at the end of its life - dismantle, demolition and materials disposal.

• RICS 2017 whole carbon assessment –

For an office the upfront embodied carbon will be 35 per cent of the whole



The Big Picture

- Climate Change Act 2008: net zero by 2050
- 6th Carbon Budget: 78% reduction from 1990 by 2035
- UK's Paris Agreement Nationally Determined Contribution: 68% from 1990 by 2030
- CCC latest Progress Report June 2022
  - 47% reduction achieved (excludes UK consumption emissions)
  - 4% increase in emissions against 2020
  - progress in manufacturing and construction hard to ascertain due to poor data
  - calls for plan to mandate WLC assessment of buildings by 2025
- Buildings 25% and manufacturing/construction 14% of UK 2021 emissions

Understanding Terminology in Planning Context

- **Whole life carbon emissions:** emissions attributed to a building across its whole life-time
- **Covers construction and the use of a building over its entire life, including its demolition and disposal essentially sub-divided into:**
  - o operational carbon; and
  - o embodied carbon (raw materials extraction, manufacture and transport and construction emissions on build and repair and dismantling, demolition and materials disposal)
- **Covers regulated and unregulated energy use + embodied carbon**
  - Regulated – fixed building services – Part L
  - Unregulated - cooking and all electrical appliances, and other small power
  - Embodied carbon

'Carbon emissions' in this context used for greenhouse gases measured in carbon dioxide equivalent emissions, or CO2e emissions

life building with later work to the building accounting for 32 per cent. For a warehouse the upfront carbon goes up to 47 per cent with works going to 29 per cent. For a residential scheme – the upfront carbon is 51 per cent. The construction stage is a huge amount of the whole life carbon emission. • UKGBC (UK Green Building Council)- Net Zero whole Life Roadmap – UK build environment was responsible for 25 per cent of UK carbon emission. The embodied carbon emissions - 20 per cent of UK built environment emissions; by 2035 – 50 per cent of UK built environment emissions. Embodied

Existing Government Commitments

- Industrial Decarbonisation Strategy
- disclosure of embodied carbon from major public works by 2025 and set target for embodied carbon from 2030
- To improve carbon info on products (via EPDs?)
- Net Zero Strategy and Gov response to CCC June 21 referenced embodied carbon
- To date no regulation on embodied carbon. Regulation and proposed regulation focuses on operational carbon i.e. energy efficiency and decarbonised heat

INDUSTRY POSITION – PART Z BUILDING REGS

Part Z Building Regs initiative proposes:

- mandatory WLC reporting within Building Reg process for buildings of >1000m2 (by 2023) or of >10 resi units (by 2025)
- mandatory (and ratcheted) limits on upfront embodied carbon (by 2027)

-FAQ re Part Z: planning stage often too early for detailed WLC assessment as required info not ready

2 Private members bills based on Part Z



UKGBC – Net Zero Whole Life Carbon Roadmap – Nov 21

- Roadmap consistent with 2050 NZ and 78% reduction by 2035. BAU would only achieve 60% reduction by 2050
- Summary for policy makers:
  - 2020s- mandatory WLC assessments via Building Regs plus limits on embodied carbon (as per Part Z re timings and scope)
  - National tool for data
  - VAT and planning reforms to prioritise reuse over demolition and new build
  - NPPF to require embodied carbon assessments



carbon will become increasingly more important.

• Government commitments on embodied carbon are non-existent. They have committed in the industrial decarbonization strategy to disclosed embodied carbon for major public works by 2025 and set targets for embodied carbon from 2030. As well as improving carbon information on materials by extending environmental product declaration.

• Industry is ahead of government – Part Z proposal-building regulation requiring mandatory whole life report for buildings of over 1000sqm or comprising more than 10 residential units.

The second part of part Z is mandatory and ratcheted periodically limits on upfront embodied carbon and we should be at that stage– by 2027.

UKGBC – Net Zero Whole Life Carbon Roadmap – Nov 21

- Recommendations for Local Authorities
  - requirement for design stage action to reduce carbon
  - for existing buildings- circular economy statement
  - major developments to do WLC assessments
  - monitor as designed v as built via planning condition

Environmental Audit Committee May 2022- Building to Net Zero- Recommendations

- Building Regs for mandatory WLC assessments for buildings >1000 m2 or >10 resi units by Dec 23 and later ratcheted targets
- Set timeframe for above by end of 2022
- Use RICS Professional Statement on WLC assessment as national methodology
- Prioritise retrofit and reuse
  - review extended PDRs
  - circular economy statements required with planning apps for demolition with reason why retrofit/reuse not possible plus WLC assessment of both options

International Comparisons- UK

- Netherland: WLC assessments for new resi and offices over 1000m2 using national methodology-2013
- France: WLC assessments for all new housing from 2022 with reduction targets to be set
- Finland: WLC assessments by 2025 for >1000 m2 and then ratcheted limits
- Sweden: climate declaration from Jan 22 and ratcheted targets from 2027
- US: public works EPD requirements

• This assessment should be done at planning stage.

• UK Green Building Council – Roadmap Nov 21

If we carry on as we are will succeed only 60 per cent reduction by 2050 and not achieve the legally binding targets.

Summary for policy makers:

– 2020: mandatory WLC assessment via Building Regulations plus limits on embodied carbon as per Part Z timings and scope

– National tool for data

–VAT and planning reforms to prioritize reuse over demolition and rebuild

Recommendations for Local Authorities:

– Requirement for design stage to reduce carbon

>>>

- >>> – Existing buildings – circular economy statements
- Major developments to the whole life carbon assessment
  - Monitoring as build carbon emissions via planning conditions
- Building to Net Zero Recommendations
  - Building Regulations for mandatory WLC assessment as per Part Z
  - Set timeframes for above the end of 2022
  - Use RICS Professional Statement on WLC assessment as national methodology
    - Prioritize retrofit and reuse – review Permitted Developments Rights, circular developments statements, whole life carbon for the retrofit and reuse vs for a new building.
      - Corporate NZ policies covering all emissions – have other drivers to deal with the embodied carbon. SBTi verified NZ targets only permit offset 5-10 per cent of residual emissions.
      - Increasing mandatory reporting requirements – not mandatory in UK to report Scope 3 Emissions (Scope 1 & 2 covered by SECR).

**Nicholle Kingsley**

- If climate change is priority there should be a clearer regulatory framework and have clear ideas of what the priorities are.
- There is no legislation but we have London Plan and the mayor leading away with the circular economy requirement, whole life carbon assessment requirement, energy statements and requirement to update them regularly and carbon offset payments as part of Section 106 contribution.
- City of London – published their planning note. Trying to regulate and make more transparent the methodology of how you assess the carbon impact of the development.
- NPPF – the embodied carbon is not mentioned directly. There is a paragraph encouraging the reuse of existing resources.
- What is the balance in all of this in relation to planning application. What the situation with M&S scheme in Oxford Street brought to light is that the government is not clear in the way to approach this and what it wants from the development. It is more reactionary.

- It is unclear of how local authorities should balance these priorities. Is it something that could come through national management development policy? What trumps what?
- It would be a shame to get to the point of refurb only because it is not the only solution.

**Discussion**

BW: It is a void in the regulations – and other countries might be ahead of UK. Permitted development rights - are unfairly attacked as they still need building regulation permission.

Stefano Koryziss (SK): Account Director at London Communication Agency

- PR and public affairs firm with focus on build environment in London.
- the work is focusing on research aspect– politics, policies, people, market research
- There are 2 questions:

The first one is in relation to M&S development – it was mentioned there is no regulation for the embodied carbon and yet the scheme was called in on the grounds of the debate of retrofit or new build. On what basis the inspectors will judge against?

In assessing the whole life carbon emission that would be done by advisers of a landlord or developer, do we risk to create a liability assessment system with all the controversial and political elements that go with that and delay the progress even further?

NK: Dealing with the first question – London Plan Policy requires that all major applications submit a circular economy report and a whole life carbon assessment and be updated as the development progresses. Energy monitoring requirement condition or in Section 106.

The inspector has to determine it against these planning policies SI2 Minimizing Greenhouse Gas Emissions and SI 7 Reducing waste and supporting circular economy.

The second question. – more assessment for developers to do for their planning application that massive increase the cost.

SC: To add – the whole life carbon assessment of the heritage group was based on the acquired assumption in the methodology used to do the

assessment as it was only 60 years life cycle, when in fact there is much longer life cycle – 100 years. This underlines the critical importance of having a national methodology that is consistent across the board and that make sense.

TR is supportive in making sure the schemes delivered are sustainable. Has been any assessment of the additional cost this monitoring process will add to the developers?

Picking up the conversation about affordable housing payment coming from the land value. Some projects take up to 10 years to get on site. During this time there would be many changes in regulations, often the developers having nowhere to go. It is important this to be recognized.

In terms of additional cost in monitoring carbon emission in different building uses – could it be that some forms of development will be priced out of market? TR welcomes case studies to understand the unexpected ramifications later on.

SC: The Environment Audit Committee Report considers the issue of the cost. The evidence received seems to be that once there are established computer models for doing this it would not be expensive. The design element to do the whole life carbon assessment is expensive but the assessment itself is not expensive – 200-400 pounds per property.

TR: That implies to have a detailed design to feed into the planning application which a developer would not do because of the expenses. It is a risk a developer would not take.

There should be a different way to do it.

BW: There was once an outline planning permission – having involved a red line on an OS extract, one-page TP1 planning application form and a stamp, and that is what you needed to do.

Now there are many digital documents that are required for planning. The idea to turn to the client for extra time and money to be able to give the assessor what it needs about the technical specifications, before having any assurance that is getting the permission, is quite unrealistic.

We need to review what happen to outline planning permission and establish some things in principles and kick as many measurable conditions into building regulations as opposed to planning. ■

## The next meeting of the London Planning & Development Forum

will be on Monday 12 December.

Location and agenda and if you would like to attend please email the Hon Secretaries at [jm@axiomarchitects.co.uk](mailto:jm@axiomarchitects.co.uk) or [riette.oosthuizen@hta.co.uk](mailto:riette.oosthuizen@hta.co.uk)

