

## Written evidence submitted by Part Z

To whom it may concern,

I write to you on behalf of the Part Z Authors, a group of built environment sustainability and embodied carbon specialists, in response to questions 1, 4 and 5 of your current inquiry and the recent updates to the National Planning Policy Framework ([NPPF](#)).

Embodied carbon emissions make up 10% of the UK's current annual carbon footprint; and more than half of the lifetime emissions of our newbuild homes. As they are unregulated, they have barely decreased in 30 years, despite existing initiatives to try to decarbonise material manufacturing. The current lack of regulation in this area is resulting in Local Authorities and private businesses having to invest their own funds into developing localised solutions. This is leading to inconsistent requirements across the country's construction projects, currently costing the industry time and money.

As such, the construction industry is calling for the Building Regulations to be amended to require the reporting and reduction of embodied carbon, as proposed through the Part Z website ([www.part-z.uk](http://www.part-z.uk)). More than 200 firms from industry have written in support of such regulation – from household names such as Barratt Homes, NatWest, abrdn, Morgan Sindall and British Land, down to SME design firms and housebuilders ([example statements](#)). Their ask is consistent with what is happening in other countries around the world, the recommendations of the Climate Change Committee, and the conclusions of the Environmental Audit Committee's 2022 inquiry into sustainability of the built environment. That inquiry's report described embodied carbon regulation as "*the single most significant policy the Government could introduce*" ([Committee publications](#)), and we hope that the current committee would agree with the previous committee's conclusion on this matter.

Returning to planning policy, it is therefore clear that updates to the NPPF must support the reporting and reduction of embodied carbon. While regulation is the only way to robustly control these emissions, the NPPF plays a key role in ensuring that planning proposals are low carbon. It must also enable Local Authorities to require higher standards on embodied carbon than national policy requires, as many Authorities have pledged to reach Net Zero well ahead of the national 2050 target. With all that in mind, the Part Z authors recommend that the following amendments should be made to the NPPF:

- Clause 8c should make explicit reference to both embodied carbon, and whole life carbon, strengthening the existing weak language on 'mitigating climate change'.
- Clause 161 should be amended to make explicit reference to both embodied carbon, and whole life carbon, strengthening existing language on 'reductions in greenhouse gas emissions'.
- Clause 164b should require embodied carbon to be reported and reduced, for example: "New development should be planned for in ways that: embodied carbon is measured, and then reduced, such as through the prioritisation of reuse of existing buildings and efficient use of low-carbon materials."
- A new Clause 166c should be added to require new developments to consider and reduce embodied carbon, for example: "In determining planning applications, local planning authorities should expect new development to: measure and report the embodied carbon related to the development involved, and demonstrate how this has been reduced in accordance with industry best practices."
- Clause 167 should be updated to weight embodied carbon alongside the existing text on energy efficiency, for example adding a new penultimate sentence: "Interventions in existing buildings should also seek to minimise embodied carbon where possible."

Regardless to whether the above is included in the updated NPPF, we also strongly recommend that the accompanying Planning Practice Guidance specific to climate change is urgently updated to reflect the same principles ([Planning Practice Guidance documents](#)). Within this, the RICS Professional Standard for 'Whole Life Carbon Assessment in the Built Environment' (2<sup>nd</sup> edition) should be directly referenced as the government-recommended standard for whole life carbon assessment and reporting.

Finally, we also highlight that the upcoming Planning and Infrastructure Bill provides an opportunity to table an amendment to introduce embodied carbon reporting requirements into the building regulations. The text from the [Carbon Emissions \(Buildings\) Bill](#) could be used for this – that bill was debated in 2022, with Jonathan Reynolds MP (now Secretary of State for Business and Trade) saying, “*We support it. I agree with [Jerome Mayhew MP’s] proposition that industry would welcome further regulation in this area*” ([Hansard record](#)). Similarly, the Department for Energy Security and Net Zero’s upcoming ‘Net Zero Buildings Strategy’, and the Ministry for Housing, Communities and Local Government’s upcoming ‘Future Homes Standard’ and ‘Future Buildings Standard’ all provide opportunity for the government to set out a clear direction of travel for embodied carbon regulation in the UK.

As an interim measure, a Ministerial Statement from the Secretary of State should also be issued on the topic of embodied carbon, providing template wording that would allow Local Authorities to address this topic in a more consistent manner.

Yours sincerely

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***Sent for and on behalf of the Part Z Authors:***

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*Tim den Dekker - Founder, The Embodied Carbon Group*

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*Simon Sturgis - Lead Author, “Professional Standard: Whole Life Carbon Assessment for the Built Environment 2<sup>nd</sup> Edition”, Royal Institution of Chartered Surveyors*

## Supporting information

### How important is embodied carbon?

The UK Green Building Council estimates the UK releases around 64 million tonnes of embodied carbon per year – more than aviation and shipping combined. This figure has stayed static for 30 years now, despite existing initiatives to decarbonise material manufacturing.

The UK Green Building Council Net Zero Roadmap (2021) also shows that during the period 2024-2050, the built environment will be responsible for the release of around 1700 million tonnes of greenhouse gas emissions. Less than one tenth of these emissions are tackled by existing regulation and the forthcoming Future Homes Standard and the Future Buildings Standard.

Meanwhile, embodied carbon due to new construction accounts for over half of the total, but is currently unregulated, and has been explicitly omitted from both Standards by the previous Government.

### Who is asking for embodied carbon regulation?

We have received more than 200 statements of support from across the construction industry calling for embodied carbon regulation. This includes support that ranges from household names such as Barratt Homes, NatWest, abrdn, Morgan Sindall and British Land, down to SME design firms and housebuilders. Many of the statements are available at [www.part-z.uk/industry-support](http://www.part-z.uk/industry-support) and we can provide a full record on request.

Such regulation has been recommended by the Climate Change Committee (CCC) since 2018. In their 2023 Progress Report to Parliament they highlighted the stark lack of progress on their longstanding recommendation of “*Set out a plan to make an assessment of whole-life carbon and material use of public and private construction projects mandatory by 2025, to enable minimum standards to be set*” ([CCC progress report](#)).

Embodied carbon regulation was also highlighted as vital in a previous report from the House of Commons Environmental Audit Committee (EAC) following their 2022 inquiry into the sustainability of the built environment. The report, entitled ‘Building to net zero: costing carbon in construction’ referred to embodied carbon regulation as “*the single most significant policy the Government could introduce*” ([Committee publications](#)). It is hoped that the current committee would agree with the previous committee’s conclusion on this matter.

Finally, it is also worth noting that this regulation would bring closer alignment with the EU. Earlier this year, the European Commission updated the Energy Performance of Buildings Directive, requiring the reporting of embodied carbon from 2028, and introducing limits two years later ([Energy Performance of Buildings Directive Recast](#)). Several European countries, such as France, the Netherlands, Denmark and Sweden already have such regulations in place.

### What would embodied carbon regulation do?

Regulation will accelerate the decarbonisation of the construction sector by bringing:

Investment: Regulation will give a clear indicator to investors that low-carbon materials and low carbon buildings are worth investing in. The UK is home to world-leading carbon-

neutral cements and concretes, but these innovations struggle to find funding under current government policy. We welcome the approaches that have been taken recently to stimulate private investment through targeted government interventions, such as has been seen with internal combustion engine vehicles. The clear market signal of embodied carbon regulation will drive private investment in the decarbonisation of the construction industry, generating economic growth.

Consistency: Regulation will bring consistency across the country's many construction projects, from housing to hospitals. Not only will this increase our pace of decarbonisation, it will also save time and money for developers and Local Authorities. Presently, more than 42 Local Authorities are investing their limited money in creating local policy to fill the void left by national regulation. We know from the experience of leading Local Authorities that these policies can have a positive impact, but the details of these policies are inconsistent across the country, leading to costs that are ultimately passed onto the public. National regulation would offer the most effective means to put an end to such wasteful behaviour. There is agreement on this by both the Royal Town Planning Institute ([blog post](#)) and the Greater London Authority's planning team (Q171 of [EAC evidence hearing](#)).

Widespread implementation: Industry would respond to such regulation overnight, as we already have all the necessary standards, guidance and tools. Leading businesses regularly calculate and reduce embodied carbon on their projects, and we have had a de-facto national guidance document since 2017 in the form of a Professional Standard from the Royal Institution for Chartered Surveyors ([Whole life carbon assessment for the built environment](#)). We see from the recommendations of the CCC and the progress report of the UKGBC that such voluntary action is not enough, but if regulation were introduced, the industry would be ready.

### **How would embodied carbon regulation be introduced?**

The Building Regulations are regularly amended through Statutory Instruments, and this route could be taken to introduce embodied carbon regulation:- no need for any new Acts. We have already written the required amendment and documentation that could be adopted by the Secretary of State, available to view at [www.part-z.uk](http://www.part-z.uk). The Ministry of Housing, Communities and Local Government has also been conducting research over the past year that would make them well placed to deliver on such an amendment. They also previously committed to *"consult on [their] approach to measuring and reducing embodied carbon in new buildings"*. ([The Future Homes and Buildings Standards consultation](#))

The topic has also been debated in both houses. In 2022, a Private Members' Bill – the [Carbon Emissions \(Buildings\) Bill](#) – was debated in the House of Commons. Labour offered its support for the Bill at the time, with Jonathan Reynolds (now Secretary of State for Business and Trade) saying, *"We support it. I agree with [Jerome Mayhew MP's] proposition that industry would welcome further regulation in this area"* ([Hansard record](#)).

In 2023, the same content was used in proposed Amendment 280 to the Levelling-up and Regeneration Bill that was debated in the House of Lords. This gained cross-party support, including by The Baroness Hayman of Ullock ([Hansard record](#)).

We are sure there would be widespread support for this regulation in Westminster today, given its ability to generate economic growth whilst strengthening the UK's global climate leadership.

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