

Green Alliance, additional information to EAC oral evidence from 20 November 2024

Q7

- Central government should follow London's example and require all developments over a certain size to submit a circularity statement. This should be extended as circular design becomes the norm. Pre-demolition assessments should be conducted before planning consent is granted to replace existing buildings, to make a clear case for demolition in relation to carbon emissions and material use.
- We endorse the proposals put forward by Part Z (<https://part-z.uk/>) for footprinting and then setting limits around carbon intensity of construction projects. This should be supported by the introduction of a national methodology for whole life carbon assessments of buildings. But that audit should also include circularity assessments (as per <https://green-alliance.org.uk/wp-content/uploads/2023/03/Circular-construction.pdf> and already in London plan).
- In the UK, London has taken the lead on pushing change throughout building supply chains, requiring circular economy statements and whole life carbon assessments for the largest developments referred to the mayor's office. This has led to suppliers of new circular products struggling to meet demand.
- New build is zero-rated for VAT while most renovation and repairs are levied at the full rate of 20 per cent. This encourages demolition over restoration. Energy saving products, such as insulation and heat pumps, were given a VAT holiday in the 2022 spring budget. This should be made permanent and expanded to other retrofitting activities that preserve or improve the environmental performance of a building, to encourage a 'retrofit first' approach

Q15

- In practice the 'avoid, minimise and mitigate' aspects of the mitigation hierarchy are being bypassed for use of BNG.
- The government should support local planning authorities to raise their ambitions above the mandatory ten per cent minimum BNG, and to set a higher minimum threshold for Nationally Significant Infrastructure Projects. Small development sites raise the issue of BNG being enacted off site which limits the possible social and climate adaptation benefits of having nature incorporated into housing developments; stronger policy wording could protect against this.
- BNG requirements should be implemented urgently for projects going through the NSIP regime, the government committed to this being the case in 2025 but it is still yet to be brought in.
- More guidance, support and resources should be directed towards local planning authorities and relevant bodies ie Environment Agency to ensure adequate monitoring and enforcement of BNG.

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