

Committee on Climate Change
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London SW1W 8NR

Baroness Williams of Trafford
Parliamentary Under Secretary of State
Department for Communities and Local Government
4th Floor, Fry Building
2 Marsham Street
London SW1P 4DF

21 December 2015

Dear Susan

Re: Housing and Planning Bill

I am writing in my capacity as a member of the Committee on Climate Change and chairman of its Adaptation Sub-Committee. The committee's role is to provide statutory advice to the Government on reducing the UK's greenhouse gas emissions and preparing for the impacts of climate change. We briefly discussed the Housing and Planning Bill and I said I would offer further advice as you prepare to take the Bill through the Lords.

Housing built now will exist for many decades if not a century or more. Choices on where to build, how homes are insulated, are heated in winter and kept cool in summer, will have lasting consequences that will be difficult and costly to change. There is an opportunity, through this Bill, to make sure the aspiration to build an additional one million homes by 2020 does not come at the expense of burdening their occupants with long-term costs and climate impacts whilst also rendering the UK's statutory greenhouse gas emission targets more difficult to achieve. We have to be confident that the new homes will be as energy and carbon efficient as possible whilst also resilient to the impacts of climate change.

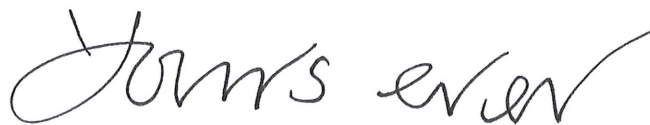
- **Flooding:** the recent events in Cumbria and the North-West are consistent with the evidence that patterns of rainfall have already changed due to historic greenhouse gas emissions yet building in areas of high flood risk continues. Despite safeguards in the National Planning Policy Framework an average of 4,600 properties are built per year in areas at a greater risk of flooding than Cockermouth, many without appropriate flood resilience measures. Flood defences provide only limited protection and so there is a case to consider again in the Bill the need to impose flood resilient building standards in areas of high risk. Given the limited capacity of sewers to handle extreme rainfall there remains the case to make water companies statutory consultees on planning applications, and to withdraw the automatic right that developers still have to connect

new homes to sewers regardless of their capacity. The uptake of sustainable drainage systems (SuDS) in new development is lamentable and the new proposals introduced in April repeat the same mistakes of the past. My committee made these points in our statutory report to Parliament in June and was not persuaded by the Government's response.

- **Heating and energy efficiency:** in ending the programme of work and policies associated with Zero Carbon Homes the Government threw away many cost-effective aspects that had widespread industry support. The EU Energy Performance in Buildings Directive from 2021 will introduce a "nearly zero energy" requirement. The Bill should build towards this by requiring new homes to go beyond current Part L requirements. At the same time, the new housing should begin to achieve the widespread adoption of low carbon heating that is needed. The uptake of low carbon heat should be consistent with what is needed to meet the fourth carbon budget and the 2050 target.
- **Overheating:** the chance of a severe heatwave causing significant loss of life has already increased with climate change. By the 2040s extreme temperatures like those experienced in 2003 will be part of a normal summer. Building regulations do not contain any provisions to protect health by reducing overheating risks and as a result people will needlessly suffer. There is now strong evidence on the health benefits of improved building standards. The Bill should set a path to introducing such standards this Parliament.

I recognise that some will claim these proposals will stall the pace of housebuilding when the aim is to accelerate it. However, much of the above comes at low or zero additional cost and delivers a range of associated benefits (for example helping to reduce fuel poverty, and improve health outcomes). The solutions are known and their introduction necessary. I know of no evidence that such measures will affect the speed at which the UK can build new homes. If these proposals are further delayed, we will have to accept an increased risk of extreme weather impacts and additional costs at a later stage of modifying these homes in order to meet national and international climate change commitments.

I would be pleased to discuss these points in more detail and consider how best to achieve these aims through the passage of the Bill.



PROFESSOR LORD KREBS Kt FRS

Chairman, Adaptation Sub-Committee