

Written evidence from the Institute of Environmental Management and Assessment

About IEMA

IEMA is the professional body for those people working in environmental management and in corporate sustainability roles. IEMA's growing membership of over 17,000 professionals work at the interface between organisations, the environment and society in a range of critical roles (for example from Sustainability Directors through to Climate Change leads and in consultancy and advisory roles). We also work with a range of corporate partners (over 200). Our professional members are active across all sectors in the UK, for example from construction and manufacturing through to logistics, facilities, and across financial, retail, food, consultancy and the wider service and public sector.

Executive summary

This short submission focuses on two specific areas of the Committee's inquiry rather than addressing all of its questions in detail. The first, is the practical steps that those organisations working in the built environment sector can take to reduce their greenhouse gas (GHG) emissions. The second, is the important role that high-quality impact assessment must continue to play in ensuring that social and environmental considerations are at the centre of planning and development.

The submission recommends that:

- IEMA's management hierarchy for GHG emissions is used widely in the built environment sector to improve its performance on sustainability and the natural environment.
- That the government's planning reforms, geared at speeding up permissions, do not come at the expense of high-quality impact assessment that is integral to safeguarding both natural and social assets.
- That impact assessment approaches are enhanced as part of the government's wider planning reforms, particularly in terms of mandating the use of Environmental Management Plans and embracing innovation and digitisation.

IEMA's GHG Management Hierarchy

The GHG Management Hierarchy¹ sets out four ways through which all organisations can manage greenhouse gas emissions, including those operating in the built environment sector. The hierarchy considers scope 1, 2 and 3 emissions² and sets out how each can be managed overtime.

1) Eliminate

- Influence business decisions / use to prevent GHG emissions across the lifecycle
- Potential exists when organisations change, expand, rationalise or move business
- Transition to new business model, alternative operation or new product / service

2) Reduce

- Real and relative (per unit) reductions in carbon and energy
- Efficiency in operations, processes, fleet and energy management
- Optimise approaches (e.g. technology and digital as enablers)

3) Substitute

- Adopt renewables/low carbon technologies (on site, transport, etc)
- Reduce carbon GHG intensity of energy use and of energy purchased
- Purchase inputs and services with lower embodied/embedded emissions

4) Compensate

- Compensate 'unavoidable' residual emissions (removals, offsets etc)
- Investigate land management, value chain, asset sharing, carbon credits
- Support climate action and developing carbon markets (beyond carbon neutral)

Adoption of the hierarchy by organisations throughout the built environment sector would aid in the standardisation of approaches to managing and reducing GHG emissions; therefore ensuring that the sector is effectively contributing to the target of a net-zero emissions economy by 2050.

The value of high-quality impact assessment in the planning process

High-quality impact assessment is an integral part of the planning processes that take place across the built environment sector. It helps to ensure that both natural and social assets are safeguarded³⁴ in the delivery of construction and infrastructure projects. This includes, for example, analysing the carbon impact of different projects and ensuring that environmental limits are not exceeded.

¹ IEMA (2020) [Pathways to Net Zero: Using the IEMA GHG Management Hierarchy](#)

² Scope 1, 2 and 3 can be understood as direct emissions, purchased emissions and supplier emissions.

³ IEMA (2021) [Impact Assessment](#)

⁴ IEMA (2020) [IEMA launch timely new EIA Guide for Climate Change Resilience and Adaptation](#)

The government's proposed planning reforms, set out steps to simplify the impact assessment regime in England. Whilst simplification may carry some practical benefits, it is crucial that the proposed reforms do not water down the scope of impact assessment and therefore lead to a regime that is less rigorous. This would ultimately compromise the performance of the built environment sector on sustainability and the natural environment over the long-term.

To ensure that the government's approach to reforming impact assessment is one that enhances the regime, IEMA recommends that reforms should focus on the following priorities:⁵

- Providing greater governance on 'scoping' non-Environmental Impact Assessment (EIA) development and mandating the use of Environmental Management Plans (EMPs).
- That clear requirements and standards for EIA and Strategic Environmental Assessment (SEA) should be published.
- Ensuring that EMPs are central to the EIA process and provide certainty on implementation, monitoring and enforcement.
- That the role of a national EIA unit for screening and scoping is appraised.
- Embracing innovation and digital EIA.
- Recognition of the importance of using competent professionals to undertake EIA and SEA.

IEMA is confident that if these recommendations are carried through, they will strengthen the impact assessment regime in England, ultimately improving the performance of the built environment sector (and other parts of the economy) on the sustainability challenges that we face.

Ben Goodwin

Head of Policy

IEMA – Institute of Environmental Management and Assessment www.iema.net

May 2021

⁵ IEMA (2021) [HCLG Committee publishes IEMA evidence to its planning inquiry](#)