ENVIRONMENTAL POLICY FORUM

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Subject: Call for evidence: Strategy for the built environment professions, trades and occupations - response from the Environmental Policy Forum

12 August 2026

Dear Built Environment Professions Strategy team

Environmental Policy Forum response to the call for evidence: Strategy for the built environment professions, trades and occupations

Introduction to our response. The Environmental Policy Forum is a coalition of 17 professional bodies and learned societies, together representing around 170,000 qualified professionals. Our members' disciplines include landscape, forestry and arboriculture, ecology, water and flood management, environmental science, environmental health, construction management, architectural technology, materials, waste and resources, fisheries and geography.

We are responding in writing rather than through the survey, because our evidence is cross-cutting in line with our members' collective expertise.

1. Scope of the strategy *(question 79; relevant to question 78)*
Annex A defines the built environment sector by reference to the Building Safety Act 2022, and states that this definition is preliminary and does not prejudge the scope of the final strategy. We ask that the point be revisited and offer the following evidence.

Work on a building cannot be separated from work on the ground it stands on. Levels, drainage, soils, trees and external spaces determine whether the completed building fulfils its original aims. In our members' practical experience, a significant share of post-completion failure occurs outside the building envelope: surface water that the drainage strategy cannot accommodate, tree planting in rooting volumes that cannot sustain it, external routes that become unsafe or unusable, and overheating that shading designed at the outset would have avoided.

The consequence is that accountability stops at the building line while risk does not. We recognise that the broader review of the dutyholder regime falls outside this exercise under

paragraph 2.8. The scope of the strategy itself does not, and we would encourage any competence framework to be tested against the question: does it identify who is accountable for everything outside the building envelope?

2. Skills, knowledge and experience *(questions 1, 2 and 19)*
Paragraph 5.5 identifies the client's ability to define outcomes, understand risk, and commission and challenge professional advice. This matches our evidence. The most material gap at pre-design is not technical skill. It is the capability to write a brief that specifies performance across disciplines – and, just as importantly, to identify professionals who are competent to deliver against that brief once written.

Briefs routinely omit performance requirements for the external environment: drainage and water management strategy, soil volumes and quality, canopy cover, habitat, and the maintenance liability that follows. Those omissions are difficult and expensive to recover once layout and levels are fixed. Where a brief does specify them, our members report markedly better outcomes and fewer disputes, without added cost at the pre-design stage.

Paragraph 5.6 refers to the hollowing out of commercial and delivery expertise in public sector organisations. We would add that in-house environmental and technical expertise has been lost on the same trajectory. A client with no such capability cannot commission or challenge advice in these areas and typically does not know what is missing from the brief.

Consistency and clarity of guidance is a related constraint on the client side, and any assessment of how well clients understand or discharge their role must account for the complicated and often contradictory nature of building regulations and guidance. This is felt most acutely by clients working across national boundaries, who must reconcile similar but distinct legislative frameworks such as the Building Safety Act 2022 and the Building Safety (Wales) Act 2026, particularly where resources are limited. The conflicting nature of building regulations guidance itself – for example, between overheating and security requirements –makes the client's task harder still for first-time or inexperienced clients. Clients must also draw on multiple, disconnected sources, from building regulations and European Norms to British Standards, which breeds confusion and an overreliance on consultants for interpretation. www.ciob.org/industry/support-for-clients/professional offers practical support on this point.

3. Interdependencies across the lifecycle *(questions 14 and 31)*
This is the theme on which the Forum has most to contribute, and we suggest it is where the strategy can achieve most. Two distinct constraints are at work. The first arises from regulation and can be beneficial: mandatory biodiversity net gain is one example. The second is set by the client's brief and budget – where project budgets are very constrained, concerns such as biodiversity, sustainability and climate resilience may be sidelined.

Questions 14 and 31 ask which decisions at one stage constrain choices later. Sequencing is one of the clearest examples in the system. Layout, levels and drainage strategy are commonly fixed before the disciplines that must work within them are appointed. Once fixed, those decisions are effectively irreversible on cost and programme grounds. What follows is remedial: planting on ground that cannot support it, water managed by exception, shading retrofitted or abandoned, and habitat provision reduced to whatever the residual land allows. The competence exists in the sector, but it is engaged too late to be used to best effect. We recommend that the strategy explicitly promotes early engagement of relevant disciplines at the pre-design stage. This is consistently cheaper and reduces risk, and so is better than resolving the same issues later in the process.

The transition from design into construction has a parallel issue, described at paragraphs 5.7 and 5.25. Where design responsibility passes to the contractor by novation, and the specification is then changed to save cost, the person who ends up doing the work is not necessarily the one whose competence was checked at approval. Continuity of the appointed disciplines through to completion is, in our view, one of the highest-value practical changes available. It requires no new competence framework, only that the arrangements approved at the outset are the arrangements carried through.

4. System infrastructure: competence standards and frameworks *(questions 12, 29 and 73)*
Paragraphs 5.15 and 5.16 observe that responsibility for design intent, safety-critical design and coordination is often not held by the same roles. It is allocated unevenly in practice and rests on a regulatory landscape that has developed unevenly. We agree, and we would extend the observation. Where a function is performance-determining but sits outside the recognised dutyholder roles, no framework attaches to it at all.

Our members' evidence points to defining competence against function rather than title. Chartered status is a strong indicator of professional standing and continuing development, but it does not by itself confirm competence for a specific role, and title-based regulation leaves functions uncovered wherever they fall between professions. We would suggest the strategy focuses initially on the Principal Designer and Principal Contractor roles, which sit across the whole project and are best placed to hold that oversight.

We recommend that the strategy builds on existing frameworks rather than creates new ones. Established benchmarks, chartered and registered designations, third-party certification and existing audit and CPD verification schemes already carry much of this load. Duplicating them has a cost, and that cost falls hardest on sole practitioners and small practices. This matters, given the equality, diversity and access considerations raised at paragraph 1.2: accreditation burden is a barrier to entry and to independent practice, and it disproportionately affects those without an employer to absorb it.

5. Accountability, enforcement and the limits of professional bodies *(questions 49, 73 and 74)*
Paragraph 3.5 notes that professional and trade body membership is often voluntary, and that bodies have limited ability to prevent those disqualified from continuing to practise. This reflects the nature of professional bodies themselves: as voluntary membership organisations, our role is to raise standards among those who choose to join, not to set minimum standards for wider society. That wider function belongs to government and to regulators accountable to government. Our members can confirm the practical consequences of this from direct experience.

Professional bodies set entry standards, verify CPD, audit members, investigate complaints, sanction and remove members. Several of our members have increased audit frequency and tightened CPD verification in recent years. None has any hold over a non-member. Removal from a body carries real professional consequences, but it does not prevent the same work being carried out the following week where the function is not reserved.

On question 74, we identify three barriers to enforcement against individuals:

a) In many cases the individual who performed a function cannot be identified after the event, because no record attaches the function to a named person. Building regulations now

require such records to be kept, at least for higher-risk buildings; we would like this to become the norm across the sector and expect that robust enforcement activity would itself encourage better record-keeping.

b) Where a function can be performed by anyone, there is no sanction available against those outside any scheme; the standard the public experiences is set by that group.
c) New regulatory duties in this space are largely untested, with little case law yet established. This means that those who might otherwise be deterred by legal consequence currently have little reason to be.

On question 49, we consider that registration or licensing tied to defined safety-critical functions in particular would be an effective instrument, provided it is proportionate to risk and built on existing schemes. We recommend the following action be taken immediately, requiring no legislation:

a) Government could specify chartered or registered professionals for safety-critical and publicly funded work, using public purchasing power as a demand-side lever and signalling the direction of the strategy ahead of publication.
b) More broadly, public procurement should be reformed to prioritise quality over lowest cost, rewarding those who invest in competence and deliver well rather than those who compete on price alone.
c) Requirements could attach named responsibility to defined functions, so that accountability is traceable after completion - which is the precondition for any enforcement at all.

6. Behaviour, conduct and culture *(questions 4, 21 and 38)*
Paragraph 5.7 records that evaluation criteria often still prioritise cost. Our evidence is consistent with this and adds a specific mechanism. Where the fee for external and environmental work is set as a residual percentage rather than scoped against the brief, the discipline is either reduced to a drawing exercise or omitted. The behaviour is rational under the incentives, and it is set by the procurement decision, not by the practitioner. We recommend that public procurement adopt balanced scorecard evaluation, explicitly weighting whole-life performance and named competence against defined functions. This would change the incentive directly, rather than relying on exhortation.

7. Cross-cutting functions: planning *(question 72)*
Paragraph 5.41 invites evidence on recurring points of friction that would benefit from clarity, consistency or coordination. Planning is the clearest one we identify.

Planning is where the external environment receives most scrutiny, through conditions on landscape, drainage, trees, biodiversity and open space. Yet the competence of those preparing information for and discharging those conditions sits outside the building regulations framework entirely. Obligations approved at planning are therefore delivered by people whose competence may not have been assessed, verified by authorities with limited capacity to check, and enforced rarely. Two regimes govern the same site to different standards. The strategy is an opportunity to align them, and doing so would improve outcomes at no additional regulatory cost to those already competent.

8. Insights from previous attempts at reform *(question 78)*

We offer the following insights:

a) Paragraph 3.7 is right that previous reform has been partial; scope is an area that demonstrates this. Reforms have repeatedly addressed the building rather than the entire site.
b) Parallel structures lose credibility. Where new frameworks have duplicated existing accreditation, the sector has treated them as administrative burdens rather than assurances. Extending what works is slower to announce and faster to take effect.
c) Voluntary measures raise the ceiling, not the floor. Successive initiatives have improved standards among those already investing in competence and left the remainder untouched.

9. Further engagement *(paragraphs 6.1 and 6.2)*
We welcome the commitment to co-design at paragraph 6.2. Forum members hold extensive expertise on the issues above and can supply real-world examples on request. We would be pleased to convene a roundtable bringing the Forum's disciplines together for that purpose, at whatever point in the design process that is most useful to the team.

We note the territorial extent set out at paragraphs 2.9 and 2.10. Many of the professionals we represent practise across all four nations, and our members' registration and accreditation schemes operate UK-wide. We would be glad to provide evidence on how that works in practice.

Yours Sincerely,

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Signed on behalf of the following organisations:

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Notes:

1. The Arboricultural Association is the leading organisation in the UK for tree care professionals working across all areas of arboriculture, representing more than 3,000 paying members at home and internationally. We work to inspire, support and promote the tree care community for a society that better appreciates and cares for trees. With the charitable objective of advancing the science of arboriculture, we raise professional standards through accreditation, training, events and publications. trees.org.uk

2. The Chartered Institute of Architectural Technologists (CIAT) is a dynamic, forward-thinking and inclusive global membership qualifying body for Architectural Technology. It exists as a not-for-profit organisation to lead, represent and promote Architectural Technology and to set and maintain the standards for education, practice and professionalism. As a regulated Chartered qualification CIAT also has a societal responsibility. It is the only international body permitted to award the regulated and protected qualification, 'Chartered Architectural Technologist' and the protected designations MCIAT or FCIAT. This status recognises the distinct nature of the Architectural Technology discipline and reflects the prestigious and independent character of the Institute. architecturaltechnology.com

3. The Chartered Institute of Building (CIOB) are the world's largest and most influential professional body for construction management and leadership. Our members work worldwide in the development, conservation, and improvement of the built environment. We accredit university degrees, educational courses, and training. Our professional and vocational qualifications are a mark of the highest levels of competence and professionalism, providing assurance to clients and other professionals procuring built assets. ciob.org

4. The Chartered Institution of Wastes Management (CIWM) is the leading professional body for the waste management sector representing over 5,500 individuals in the UK. Established in 1898, CIWM is a non-profit making organisation, dedicated to the promotion of professional competence amongst waste managers. CIWM seeks to raise standards for those working in and with the sector by producing best practice guidance, developing educational and training initiatives, and providing information on key waste-related issues. ciwm.co.uk

5. The Institute of Chartered Foresters (ICF) is the Royal Chartered home for tree professionals across the UK. It is the only UK body to offer both Chartered Forester and Chartered Arboriculturist titles. As part of its ongoing strategic objectives, the Institute regulates standards of entry to the profession; supports members and provides guidance to professionals in other sectors; offers educational advice and training to both students and tree professionals seeking to develop their careers and works to foster a greater public awareness and understanding of forestry and arboriculture. charteredforesters.org

6. The Institute of Fisheries Management (IFM) is an international organisation of people whose aim is to support and promote sustainable fisheries management for the benefit of our members, fisheries, wildlife and society. ifm.org.uk

7. The Institution of Environmental Sciences (the IES) is at the forefront of uniting the environmental sciences around a shared goal: to work with speed, vision and expertise to solve the world's most pressing environmental challenges, together. As the global professional membership body for environmental scientists, we support a diverse network of professionals all over the world – and at every stage of their education and careers – to connect, develop, progress and inspire. the-ies.org

8. The Institution of Royal Engineers (InstRE), established in 1875 and granted a Royal Charter in 1923, serves as a professional and learned society dedicated to advancing military engineering. With a membership exceeding 10,000 individuals, comprising both serving and retired personnel from the Corps of Royal Engineers and allied international military engineers, InstRE promotes the art and science of military engineering through professional development, publications, and events. It supports engineering excellence by facilitating professional registration, innovation and sustainable outcomes, alongside maintaining historical archives and museum of engineering, thereby enhancing the operational effectiveness and heritage of military engineering. instre.org

9. The Landscape Institute (LI) is the chartered body for the landscape profession. It is an educational charity working to promote the art and science of landscape practice. The LI's aim, through the work of its members, is to protect, conserve and enhance the natural and built environment for the public benefit. The Landscape Institute provides a professional home for all landscape practitioners including landscape scientists, landscape planners, landscape architects, landscape managers and urban designers. landscapeinstitute.org

10. The Society for the Environment (SocEnv) defines the benchmark for professional competence in environmental practice, ensuring key decisions are made by verified professionals. Having received a Royal Charter in 2004, we license professional institutions to award the Chartered Environmentalist (CEnv), Registered Environmental Practitioner (REnvP) and Registered Environmental Technician (REnvTech) professional registrations. There are now nearly 9,000 registered environmental professionals, sharing a common vision of delivering a sustainable future shaped by trusted environmental professionalism. socenv.org.uk