MINISTRY OF JUSTICE DECARBONISING SUB-STRUCTURES

Visualising Carbon in Platform Designs

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QUALITY INFORMATION

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REVISION HISTORY

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We aim to take you on journey that sets out the high level principles for understanding platform principles. Throughout this report, we showcase how platform principles can be used to deliver Net Zero by 2050, offering a real world example for the Ministry of Justice (MoJ). We demonstrate how the MoJ's platform approach can allow the visualisation of carbon within discreet elements, in this case, sub-structures, and how this can be harnessed to implement practical changes that reduce carbon.

EXECUTIVE SUMMARY

The context

With the UK Government's legal commitment to a net zero future, departments have begun to review the sustainability profile of their requirements.

In parallel, broader systems thinking has risen in prominence, with both the Construction Playbook and TIP Roadmap to 2030 advocating a platform-based approach as a potential route to a greener, more socially equitable built environment.

The Ministry of Justice

Through its net zero strategy, the Ministry of Justice (MoJ) has committed to reducing the embodied and operational carbon of its future built assets. The MoJ has pioneered the adoption of platform principles, rationalising the design of its future portfolio to support faster, better and greener delivery.

The majority of effort to date has been centred towards the above-ground structure, with a particular focus upon optimising a standard houseblock design. Akerlof's 'Decarbonising Concrete' project (2022) demonstrated the potential for collaboration along the value chain to realise a 40% reduction in embodied carbon against industry baselines (ICE database) – equivalent to 21.8 million kgC02e in the construction of 4 new prisons for the Ministry of Justice.

This report extends these principles, exploring the opportunity for decarbonisation within the sub-structure works.

Decarbonising sub-structures

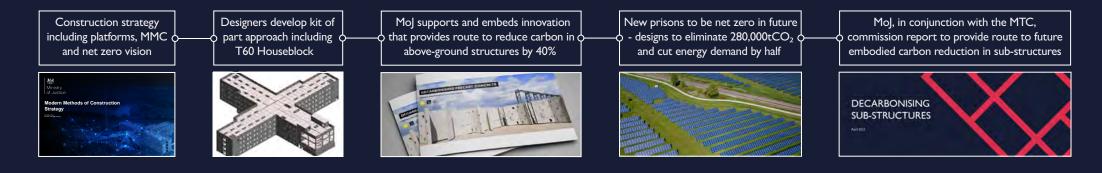
Using the 1,700-place prison at HMP Fosse Way as the basis for this research, the report focuses on the carbon content within the sub-structures and foundations, visually demonstrating the impact of each element to identify priority areas for embodied carbon reduction.

A comprehensive action plan and timeline is outlined, informing a route map for future carbon reduction as part of the MoJ's pathway towards net zero. This is recommended to include:

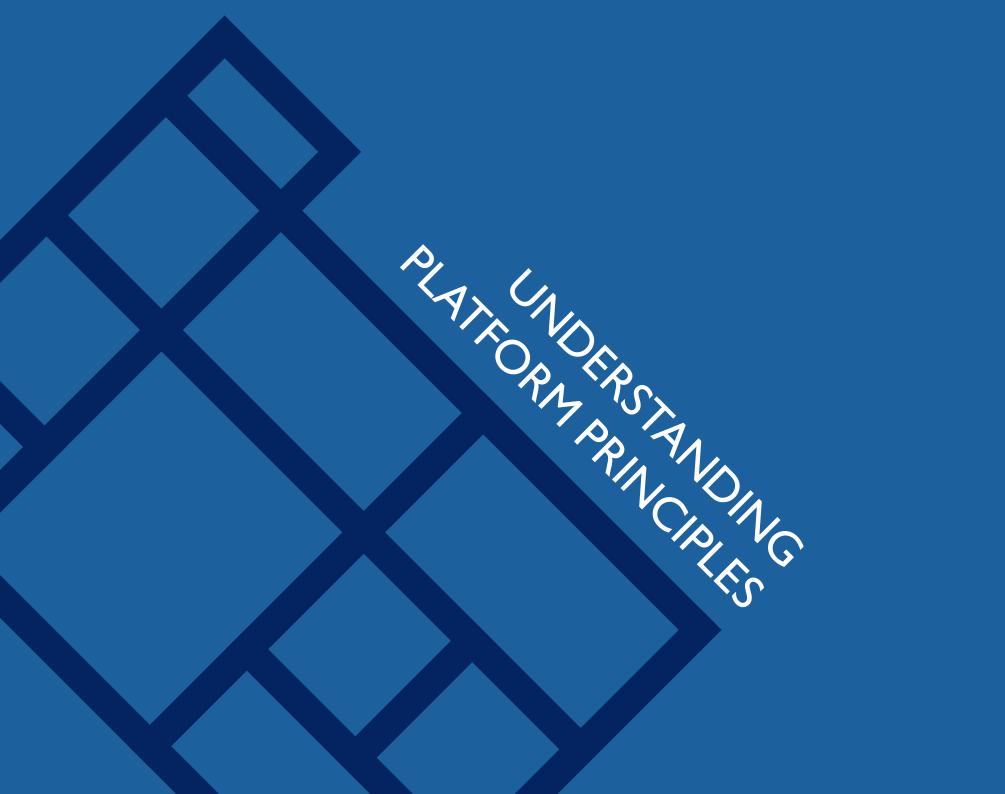
- Ground improvement techniques, to improve groundbearing capacity and enable less carbon intensive foundation designs
- Investigation into alternative foundation and piling methods, to both reduce the quantum of work and impact
- Adoption of lower carbon concrete mixes, within the substructure design, external works, fencing foundations and aprons
- Development of policy around use of zero-emission plant during construction
- Collaboration with other government bodies (inc Arms Length Bodies) for shared research towards products such as:
 - Sustainable reinforcement
 - Lower carbon materials for security fencing
 - Lower carbon hard landscaping solutions, such as low temperature asphalt

THE MINISTRY OF JUSTICE'S PLATFORM JOURNEY

The Ministry of Justice (MoJ) has successfully made forward strides towards reducing both the embodied and operational carbon of its new-build projects by defining and applying a clear net zero strategy across a long-term pipeline of work. This longer-term horizon, combined with the adoption of platform principles has allowed the MoJ to develop, benchmark and optimise standard designs, through a cycle of continuous improvement, driven by a data informed approach.



PETP LEGACY	10,000 ADDITIONAL PRISON PLACES PROGRAMME		3,000 ADDITIONAL PRISON PLACES PROGRAMME	EMERGENCY AND SHORT-TERM				
3,360	6,500	3,500		3,000	1,400 + 2,000 (SR21)		353	
NEW P	PRISONS	EXPANSIONS		EXPANSIONS	TEMPORARY EXPANSIONS		NEW PRISON	
NEW PRISON: FIVE WELLS	NEW PRISON: FULL SUTTON	HOUSEBLOCKS AND REFURBS	WOMEN'S ESTATE	CAT D PHASE I	ACCELERATED HOUSEBLOCK DELIVERY PROGRAMME	COVID-19 CAPACITY	RAPID DEPLOYMENT CELLS PROJECTS	MORTON HALL CONVERSION
NEW PRISON: GLEN PARVA	3 NEW PRISONS			CAT D PHASE 2				



A NEW PLATFORM APPROACH

Whilst the green agenda has shifted focus towards 'delivering better things', the construction industry continues to simultaneously wrestle with a need to 'deliver things better'.

The industry has repetitively been cited as inefficient and unproductive; too often focused upon bespoke outputs delivered in project silos. Further challenges exist with:

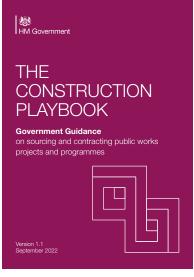
- Demographics: an ageing workforce (over a third of UK construction workers are over 50)
- Waste: with waste in defect remediation estimated to be between 10-20%
- Cost: with inflation and debt costs impacting pipelines and budgets allocated for capital allowances

With an established case for change, the government announced its commitment to Modern Methods of Construction (MMC) in 2017 with the presumption in favour of offsite construction.

In December 2020 this was expanded upon within the Construction Playbook, setting out specific proposals relating to "A Platform approach to Design for Manufacture and Assembly (P-DfMA)".

Publication of the IPA's Transforming Infrastructure Performance (TIP) Roadmap to 2030 moved this further forward; outlining the vision and focus within government towards leveraging the use of platforms (standard, repeatable assets with interoperable components) to generate improved societal outcomes from its pipeline. As the urgency to deliver net-zero has grown, so too has the prominence and profile of platforms and broader systems thinking as a potential enabler to a more sustainable industry and built environment.





Source: Infrastructure Projects Authority

Source: Cabinet Office

WHAT IS A PLATFORM?

The word 'platform' is used often in varying contexts: physical platforms, digital platforms, industry platforms, product platforms... etc.

Synonymous with themes of standardisation and repeatability, platforms typically feature:

- A set of common (low variety) core assets typically components, processes, knowledge, people or relationships
- A complementary set of peripheral components that exhibit high variety
- Stable interfaces that act as a bridge between the common core asset and variable peripherals, permitting innovation in the core and peripherals.

By applying the principles of common components, processes, knowledge and relationships, platforms have been successfully applied in manufacturing to deliver mass customised products and solutions at a reduced cost, faster and with lower risk.

Seeking to offset issues such as low productivity, poor predictability and industry fragmentation, construction has regularly been encouraged to follow suit. Both the Construction Playbook and the TIP Roadmap to 2030 reaffirm policy towards:

"procurement of construction projects based on product platforms comprising of standardised and interoperable components and assemblies". The private sector has also begun follow a similar path, a trend recognised within the 'Private Sector Construction Playbook' and propelled by publication of supporting documents such as the Product Platform Rulebook.



Source: Construction Innovation Hub

Source: Construction Productivity Taskforce

SO MANY DIFFERENT TERMS...

With terminology rapidly evolving to reflect new innovations and ways of working, the interlink between platforms, MMC and offsite manufacture is not universally clear.

The graphic below illustrates this, with MMC as a broad umbrella term, used to describe contemporary innovations in construction, that include new technologies (such as digital tools and techniques), manufactured solutions and use of efficient processes to deliver better, more productive and sustainable outcomes.

Platforms are therefore a key part of MMC and an enabler to greater use of manufactured solutions

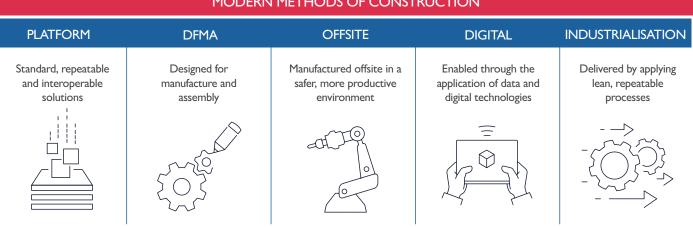
A platform-based approach is typically adopted to create a variety of products on a reduced cost base. By sharing components and processes across a platform, companies can develop distinct products and solutions efficiently, whilst maintaining economies of scale and scope.

By shifting the horizon from individual projects to programmes, platforms offer the potential to leverage the re-use of knowledge, relationships and process to:

- Offset learning curves
- Mitigate repeat work and instead enable focussed effort of all parties towards areas that add real value

- Reduce complexity and instead enhanced predictability and certainty of time, cost and quality
- Facilitate feedback loops that support continuous improvement as opposed to repetitious reinvention

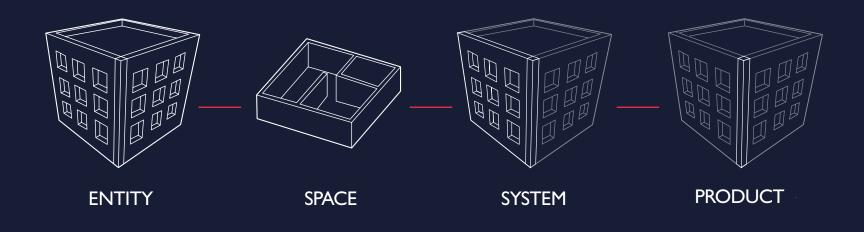
In reducing waste and facilitating continuous improvement, there is potential to leverage platforms not only to deliver societal benefits envisaged by TIP but also to propel the construction industry forward along its roadmap to net zero.

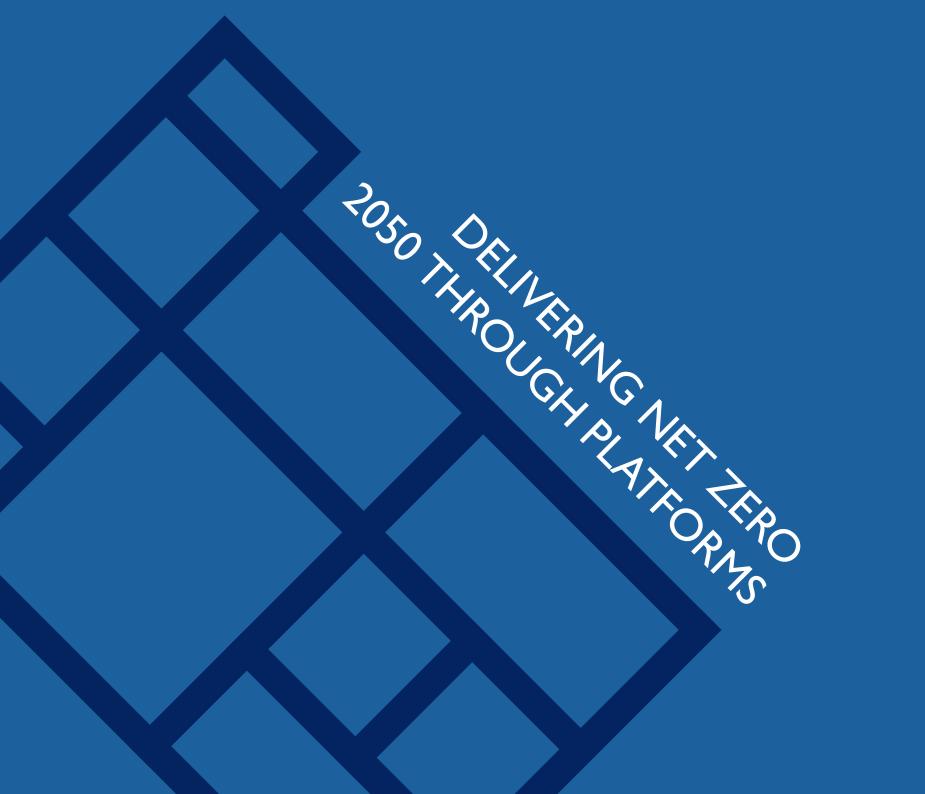


MODERN METHODS OF CONSTRUCTION

Source: Akerlof

PLATFORMS COME IN MANY FORMS BUT ARE, IN ESSENCE, ENABLERS FOR GREATER USE OF MANUFACTURED SOLUTIONS





THE POTENTIAL FOR A GREENER APPROACH

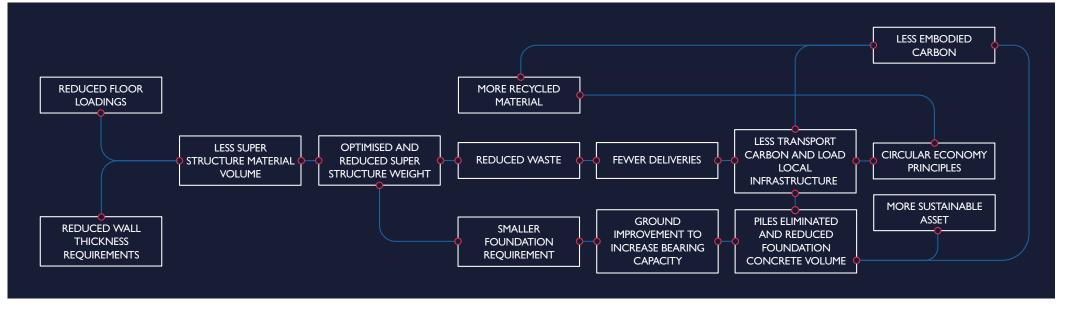
By enabling manufactured solutions, platforms offer the potential to be greener, with a reduced carbon footprint and impact upon the environment. The creation of common 'kits of parts' alongside harmonised demand unlock high-volume manufacture of components, offering an opportunity for:

- Optimised design solutions: that minimise whole lifecycle carbon
- Greater resource efficiency: with optimised consumption of energy, water and raw materials in manufacturing

- Reduction in waste and quantities in construction
- Longer product lifecycles
- Better energy performance in use: with manufactured solutions closing the performance gap between design intent and asset in use
- Circular economy: via standard sizes, de-constructable building components and assemblies that can be dismantled and reused (ISO 2887)

Flexible solutions: that minimise the carbon impact of adaption for future needs

- Enhanced innovation: fostering greater innovation by enabling organisations to develop new solutions and services that build on existing technology and components
- Continuous improvement: that is measurable.



Source: Adapted from Bryden Wood - a project example of how platforms were applied to minimise environmental impact

WHERE PLATFORMS ARE BEING APPLIED

Seeking to grasp this opportunity, tangible initiatives applying platform principles have already begun to manifest, including:

- R&D Investment: predominantly through the £172m 'Transforming Construction' programme, including development of digital and physical 'sandpit' demonstrators
- Growth in Construction Technology (ConTech): with an increased uptake in digital technology adoption, estimated at circa £1.3bn
- Specific platform-based programmes across individual Government departments including:
 - Department for Education: with the launch of their 'Alliance for Learning' programme, building upon their £4m investment in GenZero, a net zero primary school solution
 - Commissioned research into standard, digital kits of parts by Department for Levelling Up, Housing and Communities (DLUHC)
 - Department for Health & Social Care: defined commitment to platform principles across the New Hospital programme, estimated at circa £15bn

The Ministry of Justice's adoption of a platform design for its Four New Prisons programme is a leading example of this theme. Rising performance standards and far stronger focus towards net zero have only served to reinforce the shift towards manufactured solutions and the application of circular principles to support continuous improvement.



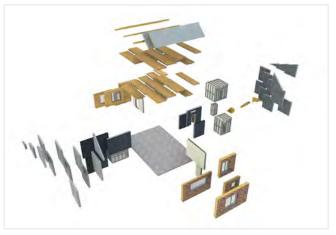
Source: Department for Education, Gen Zero



Source: Ministry of Justice, Decarbonising Precast Concrete



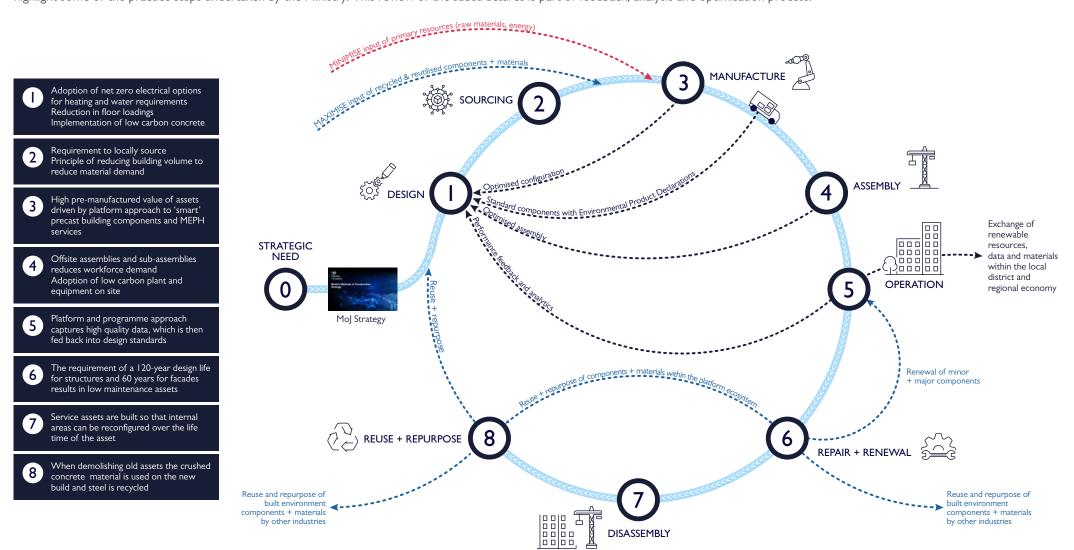
Source: Construction Innovation Hub, Sandpits



Source: DLUHC, Kit of parts

CIRCULAR 'PLATFORM' ECOSYSTEM

Linked to earlier comments, the Ministry of Justice have been able to realise many of the benefits of a 'circular ecosystem' by using a platform based approach. The visual below (adapted from Arup) highlight some of the practice steps undertaken by the Ministry. This review of the substructures is part of feedback, analysis and optimisation process.



Source: Adapted from Arup, circular economy



PROJECT SCOPE AND KEY FINDINGS

In looking to tackle carbon, the MoJ has focused to date on the highest impact areas of above-ground structures, facades and net zero energy of standard assets, with particular focus on the houseblock, due to its repeatable nature, across the estate.

Previous projects to reduce embodied carbon within both the structure and net zero in operation, utilised solutions embedded within the design principles. One of the next opportunities is to apply the same thinking to sub-structures and the site-wide infrastructure.

To focus in on the right areas, we have calculated the carbon in each element in order to visualise its impact and the areas that should be prioritised to make the most significant savings.

The following section reviews the data in different formats to inform the route map for future carbon reduction.

- Total embodied carbon within Substructures and infrastructure is kg CO₂e is 14,346,223.31 the equivalent of 7.35 houseblock structures (kgCO₂e [A1-A5] kgCO₂e 1,951,381)
- A1 A3 [Product: Raw Material Supply, Transport, Manufacturing] overall is the most carbon intensive lifecycle stage for all substructure and groundworks making a proportion of 71.79%
- A5 [Construction: Construction Installation Process] is the second most carbon intensive stage making up 16.78%

- C2 C3 [End of Life: Transport (2.03%), Waste Processing (8.29%)] make up the remaining majority 10.32%
- The top five most emitting resources are all concrete or steel related products.

We used the new 1,700-place prison at Glen Parva as our research project, undertaking calculations to establish the carbon content within the sub-structures and foundations of the built assets. This included below-ground drainage, hard landscaping, soft landscaping and security fencing across the following built assets.

- 7 houseblocks
- Casu
- Kitchen
- Workshops
- Entrance Resource Hub
- Central Service Hub
- Kitchen





Source: Lendlease, Glen Parva

CALCULATION PRINCIPLES

Taking quantities from HMP Glen Parva, we broke these down into both material and asset composite parts. We also looked at operational activities on site at an aggregated level, using relevant EPDs or trade data to provide an overview of cradle to practical completion [A1- A5] carbon impacts. Using industry data we measured cradle to grave [A1-C4] and beyond the building lifecycle [D]. Sources of carbon were identified and assigned with appropriate carbon factors to obtain kgCO₂e per unit of measure. This resulted in the carbon calculators using One Click LCA software.

By working through the different benchmarks and sourcing Environmental Product Declarations (EPD) data, we developed a real world scenario, with a combination of carbon factors that most accurately reflected the supply chain and the materials deployed.

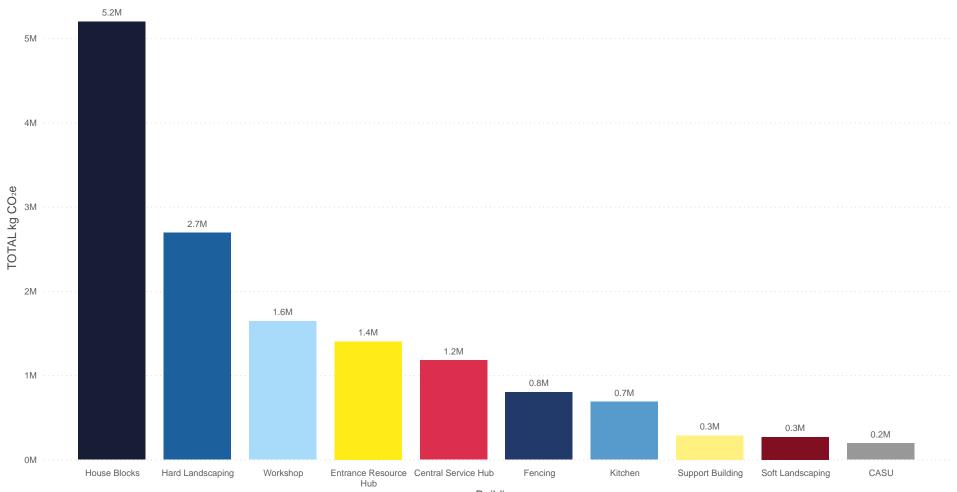
- Material quantity is based on Glenn Parva
- Assumed distance for transportation of the resource used is set to 5km for all materials to provide an 'average location approach'. We believe 5km to be representative due to the proportion of mineral products
- Where the exact specification of materials could not be obtained (for example recycled content), a national average has been used
- Where the exact material could not be used, a likewise material of the same grade or type has been substituted

- Site impacts are calculated through value of works undertaken (lifecycle stage A5)
- Electricity site usage could not be obtained and is therefore omitted from the calculation leaving lifecycle stage B6a blank (usage would have minimal affect)
- We have been unable to locate EPDs for security fencing and kerbs and so equivariant material data has been used
- Whilst every effort has been made to use accurate data, the report relies on a number of third party sources that have not being verified.

CALCULATOR	standard	DESCRIPTION				
	PAS 2050:2011	A product carbon foot printing methodology developed by the British Standards Institute (BSI)				
CONCRETE CARBON CALCULATOR	BS EN 15804:2012	The European Standard developed to provide "Core Rules" for the environmental life cycle assessment and production of Environmental Product Declarations				
EN 16757		The product standard developed by the CEN Technical Committee responsible for concrete and provides a further specification of EN I 5804 for concrete				
	EN 15978	The European Standard developed to provide overarching methodology for the environmental life cycle assessment of buildings. It follows the same principles and methodology as EN 15804 for construction products				
BUILDING LEVEL CARBON CALCULATOR	RICS Professional Statement on Whole Life Carbon Assessment for the Built Environment	An implementation of EN 15978 provided for the UK, giving relevant defaults, sources of data and proposing a recommended scope for assessment				
EN 16757		Provides guidance on the assessment of carbonation for concrete. This has also been considered as part of the review				

Total $\mbox{kgCO}_{\rm 2}\mbox{e}$ by building

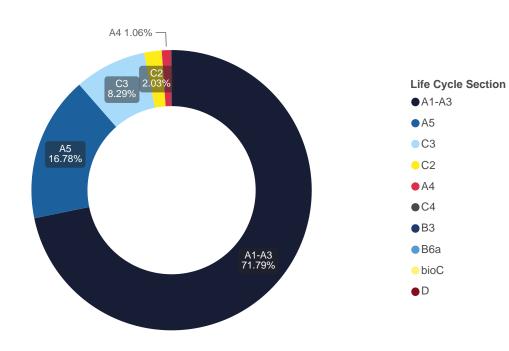
- Comparison of building substructures and materials classified within hard landscaping, soft landscaping and fencing
- Houseblocks incudes all seven on the site.





Lifecycle stages for all projects

- The table shows the volume by life cycle stage and by asset type
- The bulk of carbon is within A1 A3 and is dominated by concrete and steel products.

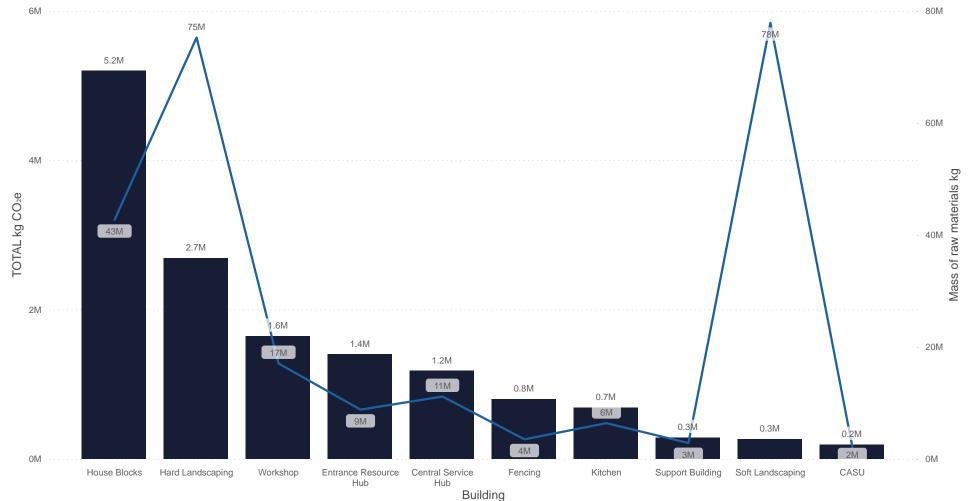


Building	Sum of TOTAL kg CO ₂ e
CASU	193,340.80
Central Service Hub	1,179,114.48
Entrance Resource Hub	1,400,918.43
Fencing	800,940.34
Hard Landscaping	2,691,943.84
House Blocks	5,197,896.51
Kitchen	685,998.02
Soft Landscaping	267,186.26
Support Building	285,566.89
Workshop	1,643,317.75
Total	14,346,223.31

14.35M TOTAL kg CO₂e
14.43M A1-A3 TOTAL kg CO₂e
212.67K A4 TOTAL kg CO₂e
3.37M A5 TOTAL kg CO₂e
0.00 B3 TOTAL kg CO₂e
0.00 B6a TOTAL kg CO₂e
-1.35M bioC TOTAL kg CO₂e
408.81K C2 TOTAL kg CO ₂ e
1.67M C3 TOTAL kg CO₂e
12.47K C4 TOTAL kg CO₂e
-4.40M D TOTAL kg CO₂e

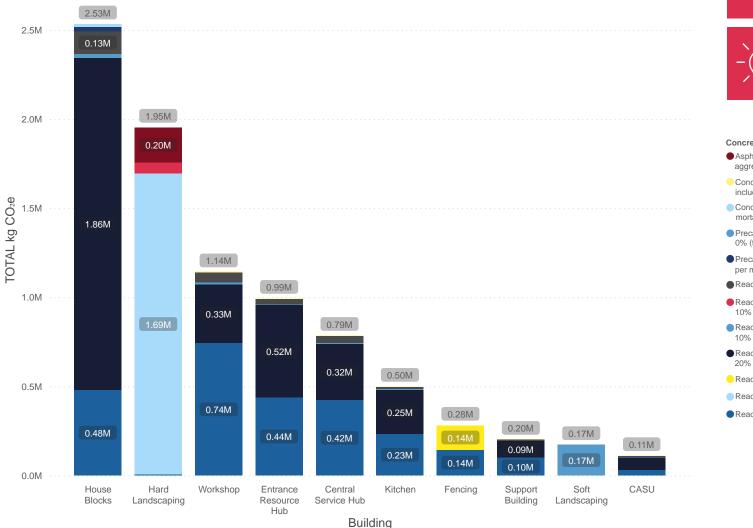
Total kgCO₂e and mass of raw materials kg by building

- The table visualises the amount of carbon within the substructures of each asset, compared with the hard landscaping, fencing and soft landscaping
- The bars represent the volume of carbon compared to the line that represents the volume of material. One third of carbon is within the houseblock substructures, as expected. The lowest impact by volume is within the soft landscaping.
- TOTAL kg CO₂e Mass of raw materials kg



Total kgCO₂e concrete mix by building

• The table visualises the CO_2e by concrete mix type within each classification.



Significant opportunity exists to use reduced carbon concrete mixes both within the sub-structure design but also the external works, fencing foundations and aprons.



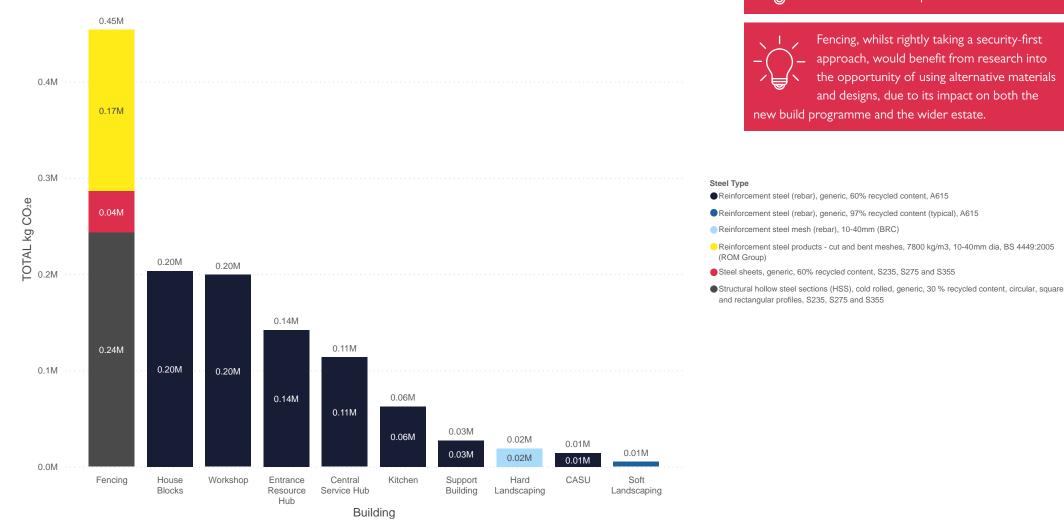
Significant opportunity exists to use alternative foundation and piling methods, to use alternative material and reduce quantum.

Concrete Type

- Asphalt concrete for heavy load bearing applications, hot mix, 2% bitumen, aggregate size 31mm, ABK 31 RC 50 BitumenMix 2 (Asfalttikallio)
- Concrete block wall, with cellular high density solid blocks, per m2 of wall including mortar, 140mm thickness wall
- Concrete block wall, with high density solid blocks, per m2 of wall including mortar, 100mm thickness wall
- Precast concrete wall elements (solid, uninsulated), generic, C30/37 (4400/5400 PSI) 0% (typical) recycled binders in cement (300kg/m3/18.72lbs/ft3), incl. reinforcement
- Precast concrete, excluding rebar, with Ordinary Portland cement, 300kg cement per m3 concrete
- Ready-mix concrete, GEN3 (C20/25), CEM I (Hanson HCG)
- Ready-mix concrete, normal-strength, generic, C20/25 (2900/3600 PSI), 10% (typical) recycled binders in cement (240kg/m3/14.98lbs/ft3)
- Ready-mix concrete, normal-strength, generic, C30/37 (4400/5400 PSI), 10% (typical) recycled binders in cement (300kg/m3/18.72lbs/ft3)
- Ready-mix concrete, normal-strength, generic, C40/50 (5800/7300 PSI), 20% recycled binders in cement (400kg/m3/24.97lbs/ft3)
- Ready-mix concrete, PAV1
- Ready-mix concrete, PAV2
- Ready-mix concrete, RC 32/40 (32/40 MPa), with CEM I

Total $kgCO_2e$ steel type by building

• The table visualises the volume of steel within each classification.



Significant opportunity exists to ensure that the most sustainable reinforcement is used to minimise carbon impact.



Total $kgCO_2e$ by material type

- The table visualises the carbon impact of all materials and site impacts
- Different types of concrete dominate the carbon footprint.

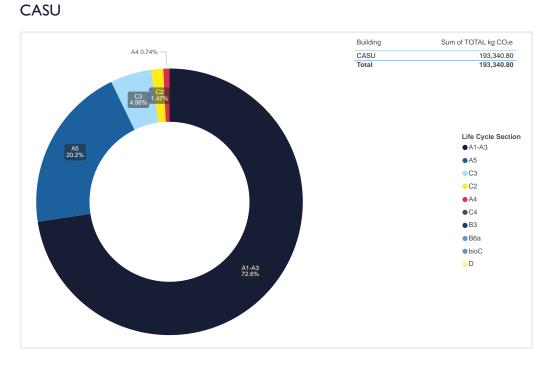


 Opportunity exists to implement policy
 around the use of zero-emissions plant and sustainability measures during construction.

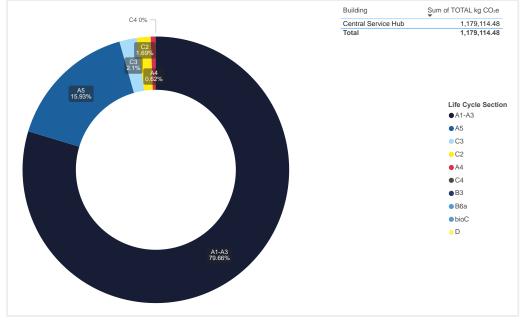


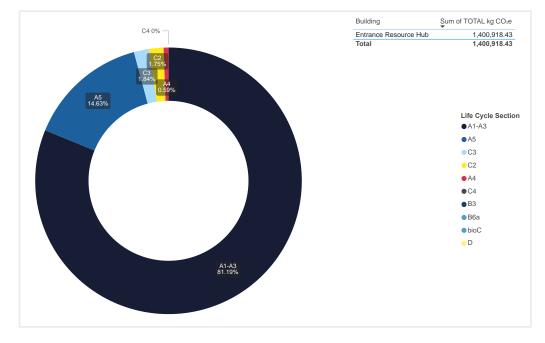
Use of reduced-carbon hard landscaping materials such as low temperature asphalt. Recognising that hard landscaping renewal is also required on across the wider estate.

Ready-mix concrete, normal-strength, generic, C40/50 (5800/7300 PSI), 20% recycled	Ready-mix concrete, RC 32/40 (32/40 MPa), with CEM I	Reinforcement steel (rebar), generic, 60% recycled content, A615		Waterproofing membrane, single component, cold applied, from PU, 1.5 mm, 1.98 kg/m ² , Sikalastic-625 (Sika)		
		0.76M				
		Stone mastic asphalt SMA, 2314 kg/m³	Ready-mix concrete, GEN (C20/25), CEN (Hanson HCG	 Hollow Section Cold rol generic recycle 	Structural hollow steel sections (HSS), cold rolled, jeneric, 30% ecycled content	
		0.30M	0.28M	0.24M		
3.44M Average site impacts based on project value per £1 million (RICS 2022)	2.60M Ready-mix concrete, PAV2	Ready-mix concrete normal-strength, generic, C30/37	, Aggregate (crushed gravel), generic, d bulk densi	ry steel products - cut and bent meshes		
		Generic aggregate for	0.18M	0.17M		
		concrete, asphalt, fill material or landscapin application (Tarmac C 0.22M	G Formwork, Single sided with steel fixtures	Ready-mix concrete, PAV1	Asphalt, hot mix, ABS11 70/100	
			s, 0.14M	0.14M	0.09M	
		0.20M	Ready-mix concrete, nomal	generic	recast Rebar xcl. ebar	
		Asphalt concrete for heavy load bearing applications, hot mix	0.06M Seed and mulch	Excavation works		
2.77M	1.69M	0.20M	0.05M	Soil, loose dry density		



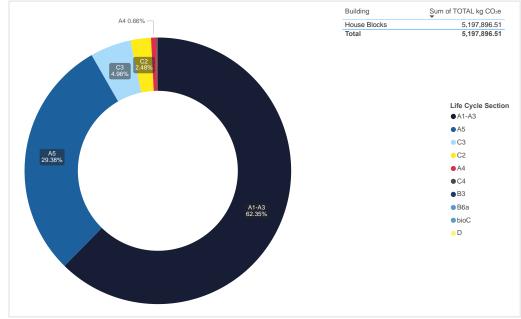
Central Service Hub

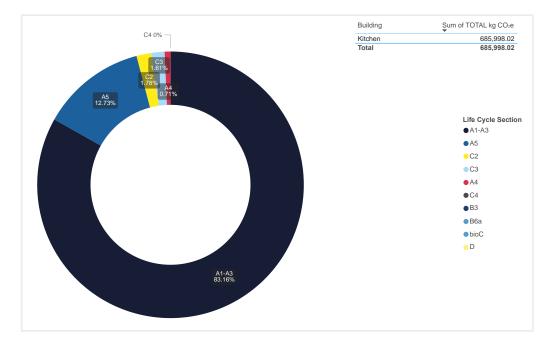




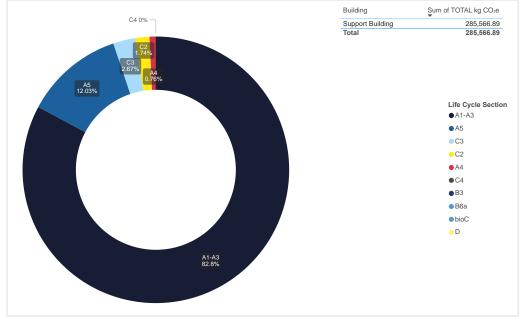
Entrance Resource Hub

Houseblocks



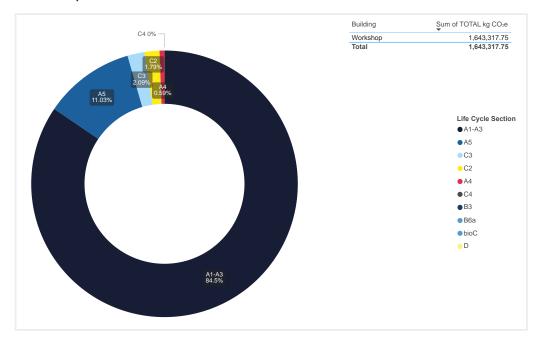


Support building

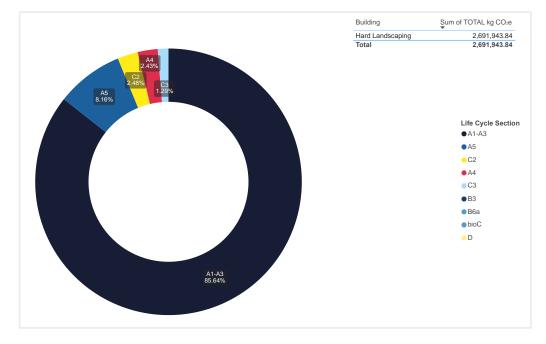


Kitchen

Workshop

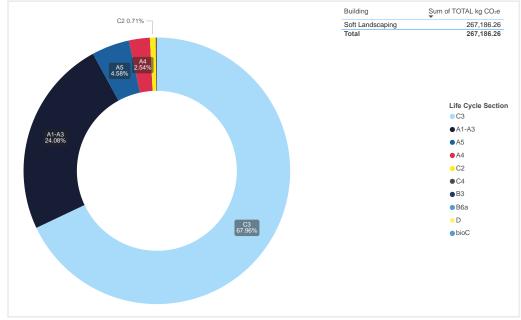


LIFECYCLE BREAKDOWN BY OTHER ASSET TYPES



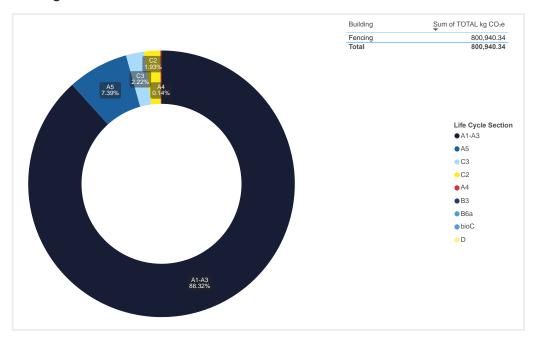
Hard landscaping

Soft landscaping



LIFECYCLE BREAKDOWN BY OTHER ASSET TYPES







REDUCING CARBON IN FOUNDATION DESIGN

Substructure design within prisons and, in particular, houseblocks, has traditionally specified the use of ground beams, pile caps and CFA piles. This is predominantly due to the weight of the buildings and ground conditions, which are often made ground.

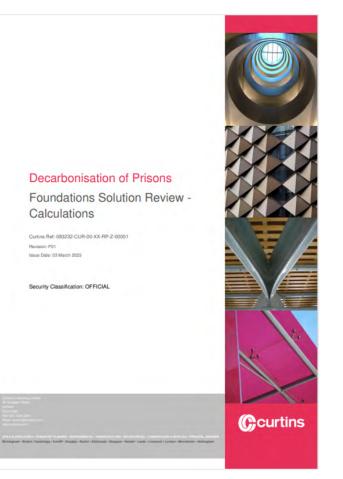
However, following an extensive review, the Curtins engineering team has identified that opportunity exists within the way substructure design is thought about and delivered, which, if applied, could deliver significant carbon savings.

Ground improvement techniques have a lower carbon impact and, once the ground-bearing capacity is improved, can be combined with a wider range of less carbon intensive foundation designs.

Established methods include admixtures such as lime or cement stabilisation, wet and dry deep soil mixing, and soil stabilisation GGBs. This requires a mature supply chain to deliver ground improvement and, whilst every site isn't suitable, the majority would benefit from this approach.

When combined with alternative piling approaches, such as Vibro stone columns, overall savings could be in excess of 50%, when compared with traditional CFA piling.

Furthermore, we are seeing a number of new piling methods that both reduce carbon and allow the incorporation of heat recovery systems within the element. With the expectation that this technology will mature in the near future, these opportunities are recommended to be monitored and reviewed by the department.



Source: Curtins, reducing carbon design process

DECARBONISING CONCRETE

Carbon-reduction thinking is becoming widely adopted within building structure design, however it is not always carried through within specifications relating to foundations, piling or in the extensive areas of hard landscaping such as kerbs, drainage, road and footpath construction. This may be relatively unique to the MoJ, in terms of their extensive use of concrete within security fencing foundations and defence measures.

Concrete is a unique material, in that the specifier can directly influence its constituent parts to ensure an optimum carbon footprint. Certain aspects can be adjusted to meet performance criteria, address design imperatives of resource and energy efficiency within a whole life context, and apply the principles of a circular economy.

Cement only makes up a small percentage of concrete mixes, however it is almost exclusively responsible for the CO_2 emissions associated with concrete production. By replacing a proportion of cement with alternative materials, the environmental impact of concrete production can be lowered.



Source: Institution of Civil Engineers (ICE)

REDUCING CARBON IN PRISON FENCING

The MoJ has, for many decades, applied a platform approach to its security fencing, resulting in highly-defined technical standards and standard details that are rightly securityfocused. These bring standardisation both to the constructed security measures, as well as methods of operation and management across the entire estate.

The value of the existing solution cannot be underestimated, however, due to the specialist nature of the components and supply chain, little work has been done regarding carbon calculation or reduction measures.

MoJ standards for fencing have never been looked at through the lens of carbon. The current design uses a significant amount of steel for posts, mesh and screening, as well as access gates and vehicle locks. It also requires a significant volume of concrete for foundations, patrol paths and antiburrowing measures.

The opportunity exists to work with the supply chain, and potentially academic partners, to review the materials used and look at either modifying the specification to increase recycled content, within the components and materials for example, or the use of alternative materials.





Source: Binns Fencing

REDUCING CARBON IN HARD LANDSCAPING

Lean on others

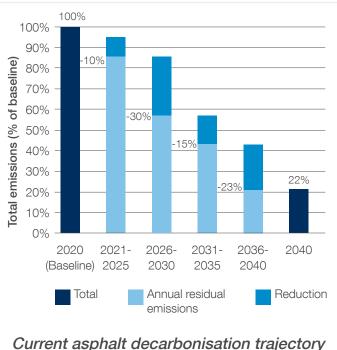
Advantages can be gained through cross-department collaboration. Whilst hard landscaping is not core to the MoJ's focus on design and innovation, it is a key area of development for National Highways. Using shared knowledge specifications can be re defined. In 'Net zero highways: our zero carbon roadmap for concrete, steel and asphalt', National Highways has a defined strategy for key materials. One good example and an opportunity for adoption would be low-temperature asphalt.

Low-temperature asphalt

Innovation in asphalt is moving quickly, with many new products entering the market. One such product is Warm Mix Asphalt (WMA) technology, which has the potential to reduce the embodied carbon of asphalt by up to 15 percent compared to conventional hot mixes. The principle behind the technology is that lower temperatures are used to manufacture the material, requiring less energy and therefore emitting less carbon.

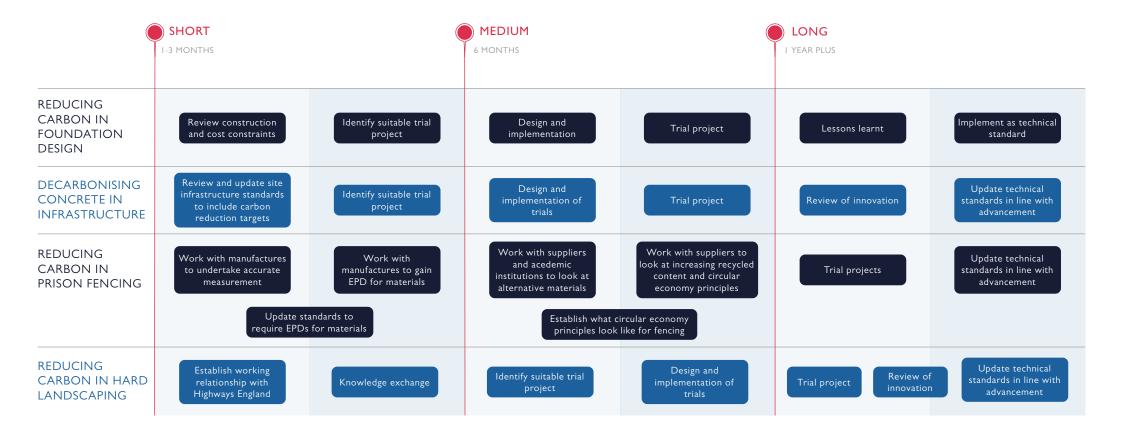
By collaborating with National Highways to remain informed about advances, specifications can be regularly updated in line with material technologies to reduce emissions by 78% by 2040.





Source: National Highways

ACTION PLAN



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