

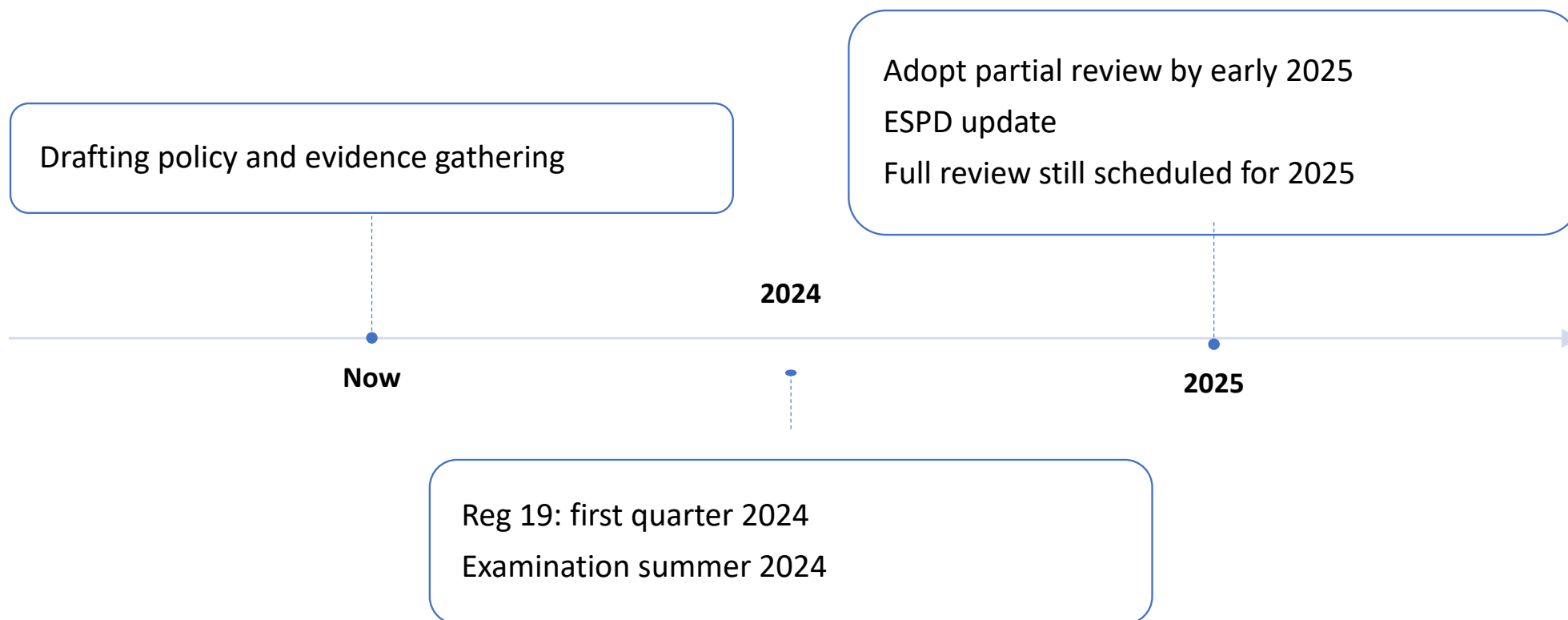


City of Westminster

# CITY PLAN

Partial review: introducing a new policy for retrofit and reducing embodied carbon

# City Plan: Partial Review



# Context: climate emergency

1



City of Westminster emits a total **1,671.9KT** Co2 per annum



Council target of net-zero City by 2040



Climate Change Act (2008) targets for 2035 and 2050

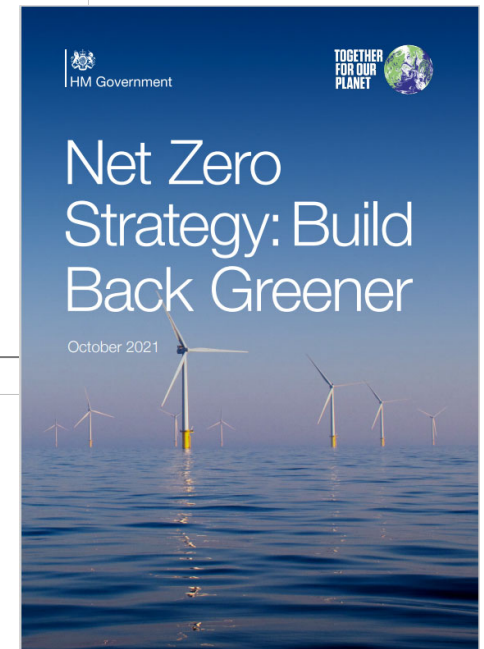
## Context: delivering net-zero

- Local authorities have a critical role to play in meeting national targets
- Section 19(1A) of the Planning and Compulsory Purchase Act 2004: *‘Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.’*
- Obligation introduced through the Planning Act 2008 alongside the Climate Change Act 2008



*“Local authorities would have a critical role to play in the achievement of net zero”*

*82% of the UK’s emissions are “within the scope of influence of local authorities.”*



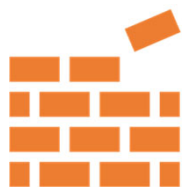
## Context: delivering net-zero

- Chapter 14 of the National Planning Policy Framework (NPPF):

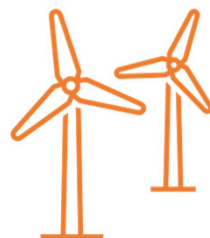
*The planning system should ... help to: shape places in ways that contribute to **radical reductions in greenhouse gas emissions** ... Plans should take a **proactive approach** to mitigating and adapting to climate change ... In line with the objectives and provisions of the Climate Change Act 2008*



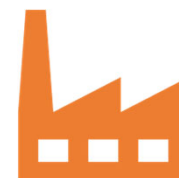
# Why the focus on embodied carbon and retrofit?



Embodied carbon is a significant source of WCC emissions. Est. 301.4KT per annum.



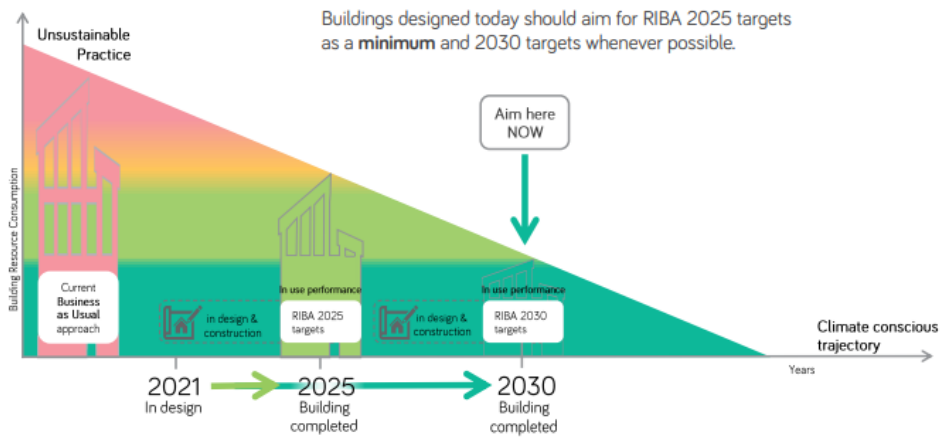
Operational energy important area of emissions long term, but embodied carbon emissions are immediately emitted.



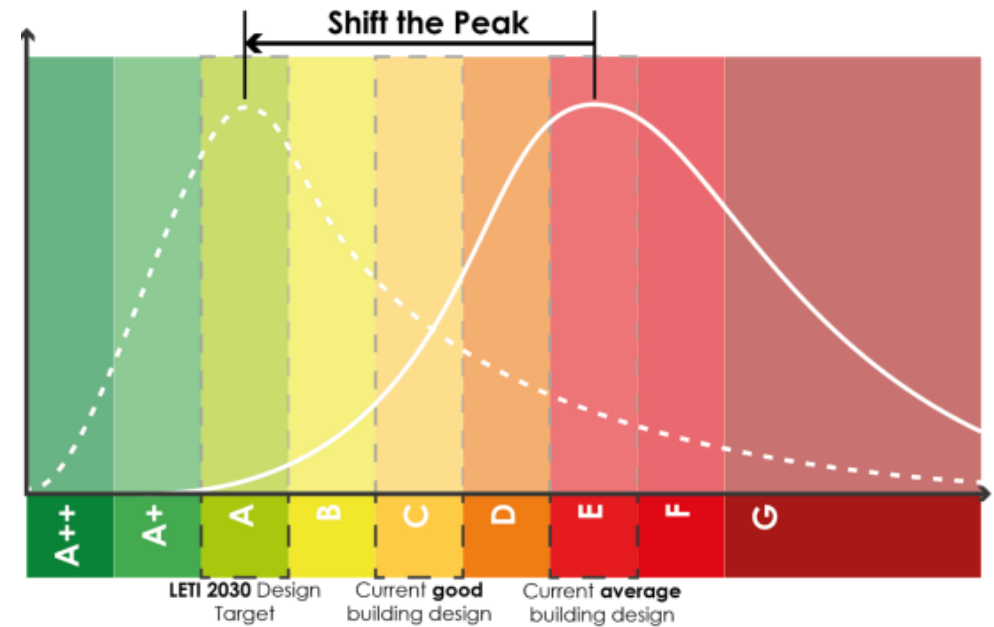
Global supply chains mean emissions from materials will remain high despite changes to UK grid.



## RIBA Climate Challenge



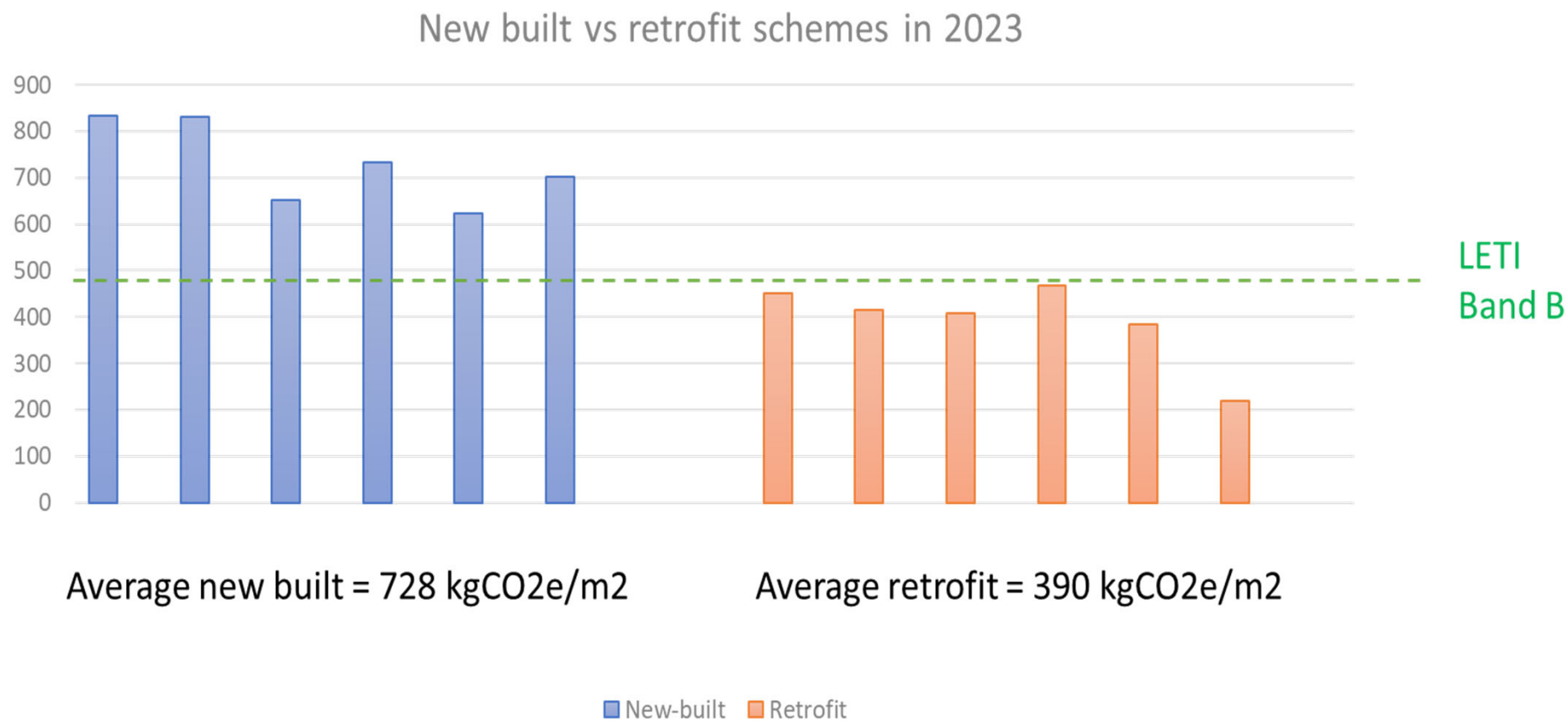
## LETI: Embodied Carbon benchmarks



City of Westminster

# WLC trends: upfront carbon

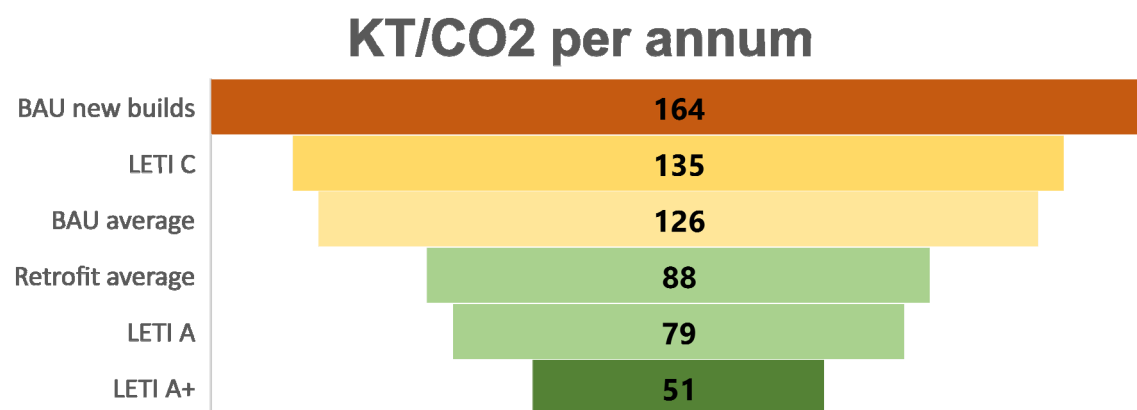
CITY  
PLAN





# Regulation of EPC ratings for commercial buildings

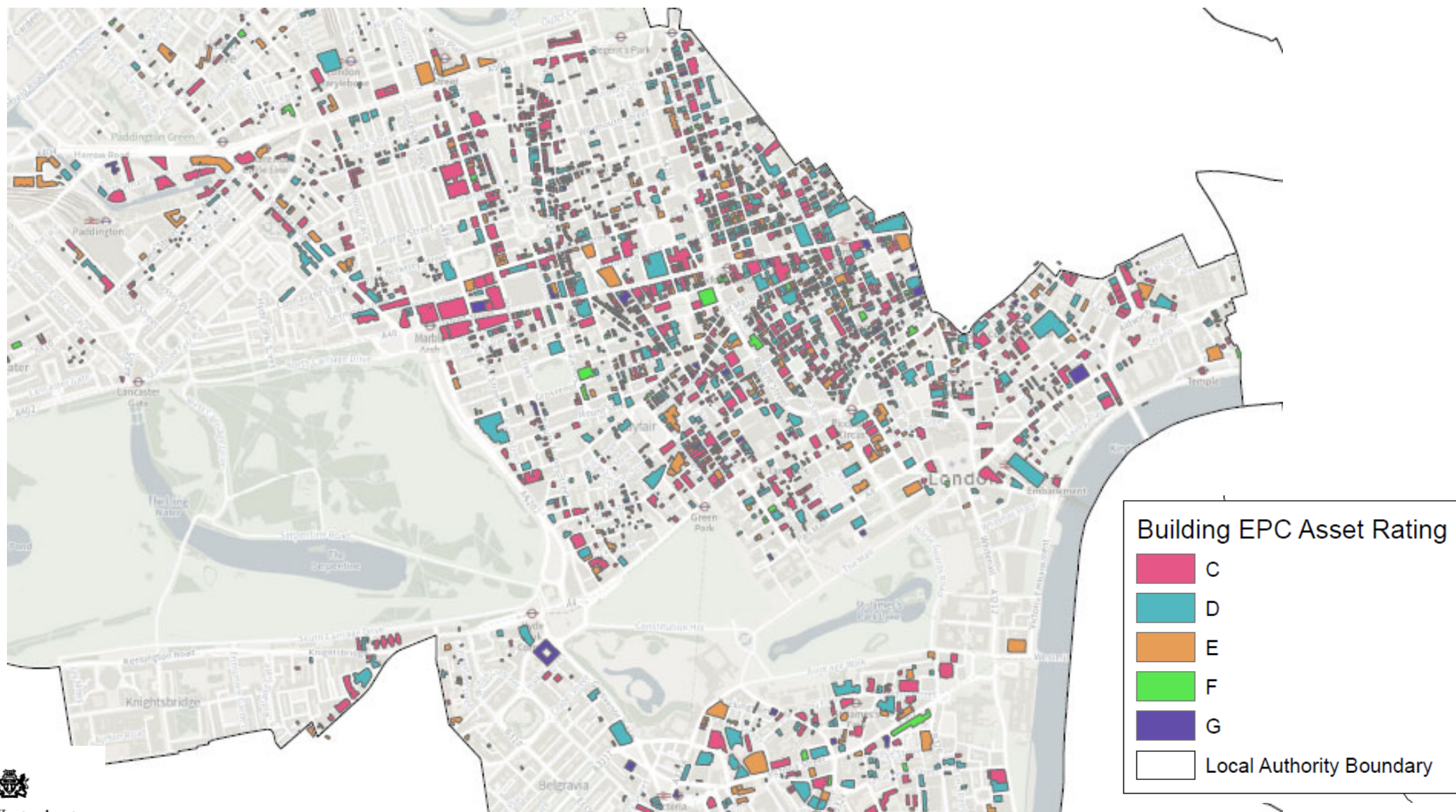
Est. 676,341sqm office floorspace which would likely need planning consent to meet new EPC bands by 2027



*For comparison, across WCC in 2021:*

- **Domestic Gas:** 189KT
- **Total domestic electricity:** 98KT

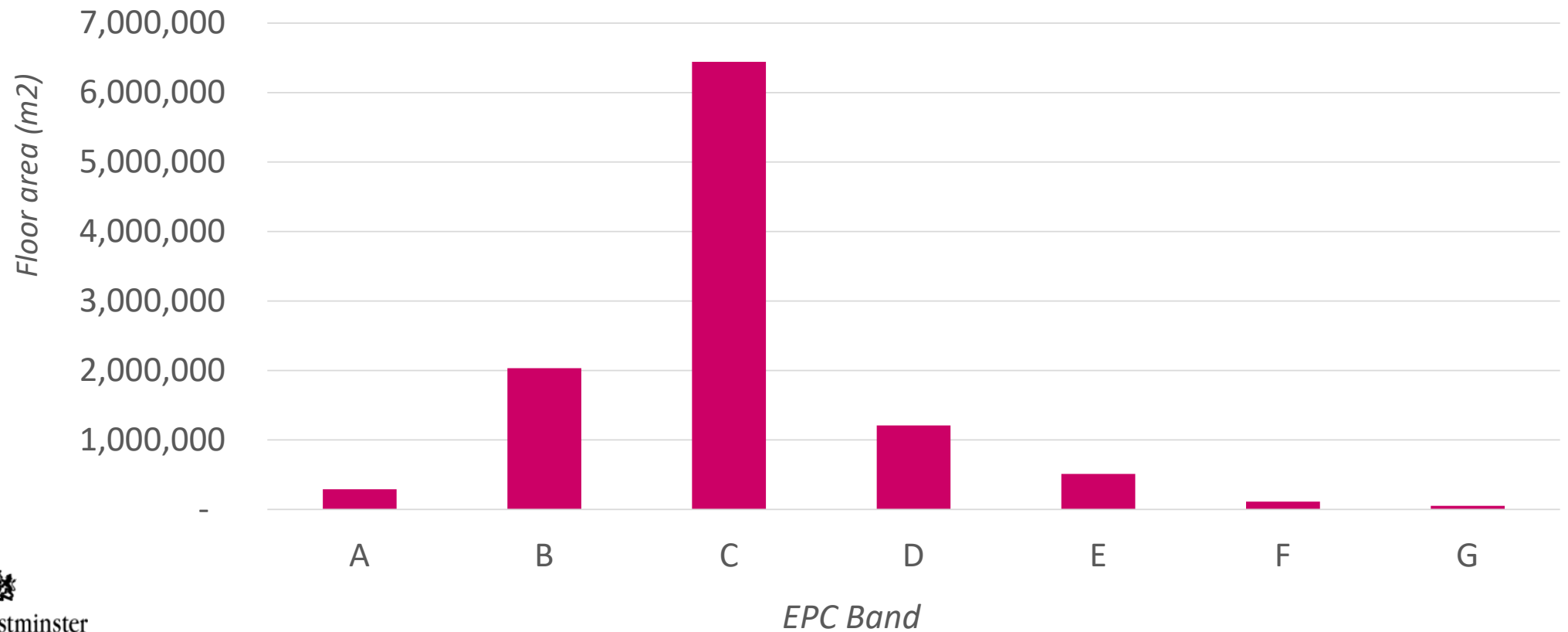




# EPC ratings across the City

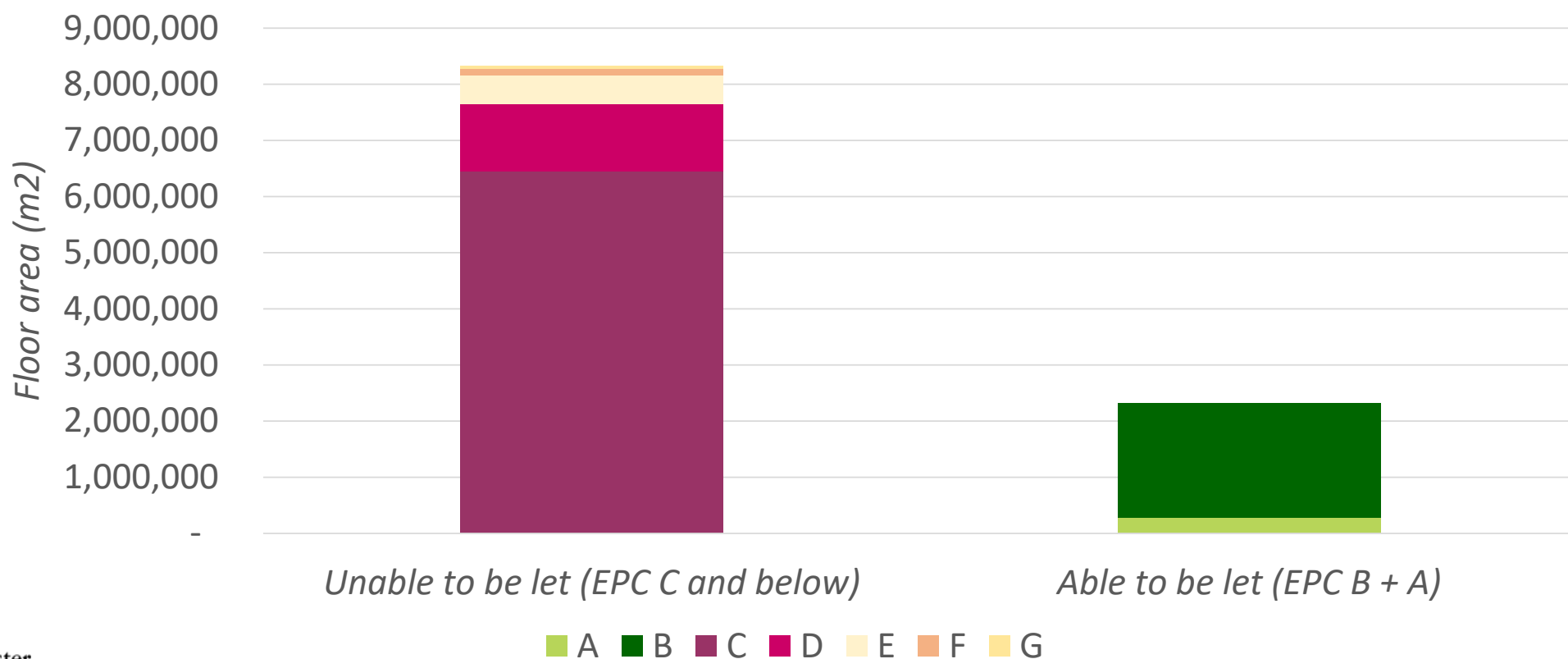


EPC data by property type 'Offices and Workshops' for WCC



# EPC ratings across the City

EPC data by property type 'Offices and Workshops' for WCC  
**Premises which could not be legally let from 2030**



## Retrofit-first policy to accelerate building upgrades

- 79% of all office space in WCC is EPC C and below
- Current regulation timeframes mean unlettable by 2030
- Policy should facilitate retrofitting these buildings to meet EPC requirements
- Reduce the likelihood of stranded assets
- Local Area Energy Plan



## Issues current position:

---

No clear approach to newbuild vs retrofit

---

Lack of clear policy position on retrofit

---

Embodied carbon reductions voluntary



# Policy objectives:

- ✓ Promote retrofit as a default form of development
- ✓ Take more selective approach to demolition
- ✓ Clear policy position on embodied carbon
- ✓ Give more certainty to applications involving retrofit
- ✓ Certainty on what new buildings are supported



# Draft Policy

- **Part 1:** introduce controls on demolition through a series of tests.
- **Part 2:** Set benchmarks for embodied carbon for major schemes, and when substantial or total demolition is proposed.
- **Part 3:** Unlock and promote retrofit, and support extending buildings required to facilitate retrofit and will be promoting responsible retrofitting.





## Draft policy part 1: **Controlling Demolition**



- Introduce a series of tests for demolition:
  - A. Public benefit
  - B. Practicality/Structure
  - C. Carbon
  - D. Bespoke operational requirements
- Partial and substantial demolition where it facilitates a retrofit is excluded – but should still be fully justified.

**Remember:** It is always open to planning committee to consider any material or strategic considerations which override the requirements of the policy.

# Demolition tests: detail

A: **Public benefits** should be demonstrated to be undeliverable through retrofit.

## Examples: (not exhaustive)

- ✓ Fast track levels of affordable housing, or Estate regeneration
- ✓ Major public realm improvements
- ✓ Discretion of the Planning Committee
- ✓ Townscape improvements

- B: **Practical test** means unsuitable/damaged buildings, and structural report likely required.

## Examples:

- ✓ Dilapidated buildings beyond viable repair
- ✓ Some prefab buildings
- ✓ Multi-storey carpark



## Demolition tests: detail part 2

C. **Bespoke operational requirements** must be linked to the proposed use, and undeliverable through retrofit.

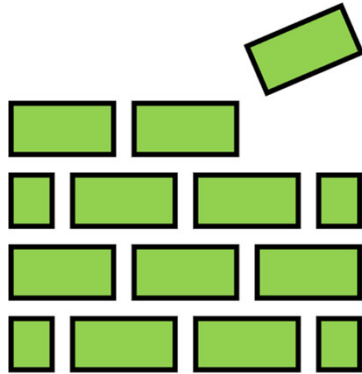
### Examples:

- ✓ **St Mary's hospital** – hospital must remain operational during construction, and new site requires bespoke features e.g. helipad.
- X **Floor to ceilings heights** unlikely to meet the test for bespoke operational requirements for office, except in exceptional circumstances.

D. **Carbon test** – The building requires such extensive retrofitting to lower its operational carbon/make it structurally sound, that the embodied carbon required would be similar to rebuild and the operational carbon would still be greater.

- ✓ **Whole-life carbon assessment** required – optioneering assume a retrofit with a extended life-span compared to a new building.
- ✓ Where WLC is similar, may still come down planning balance.

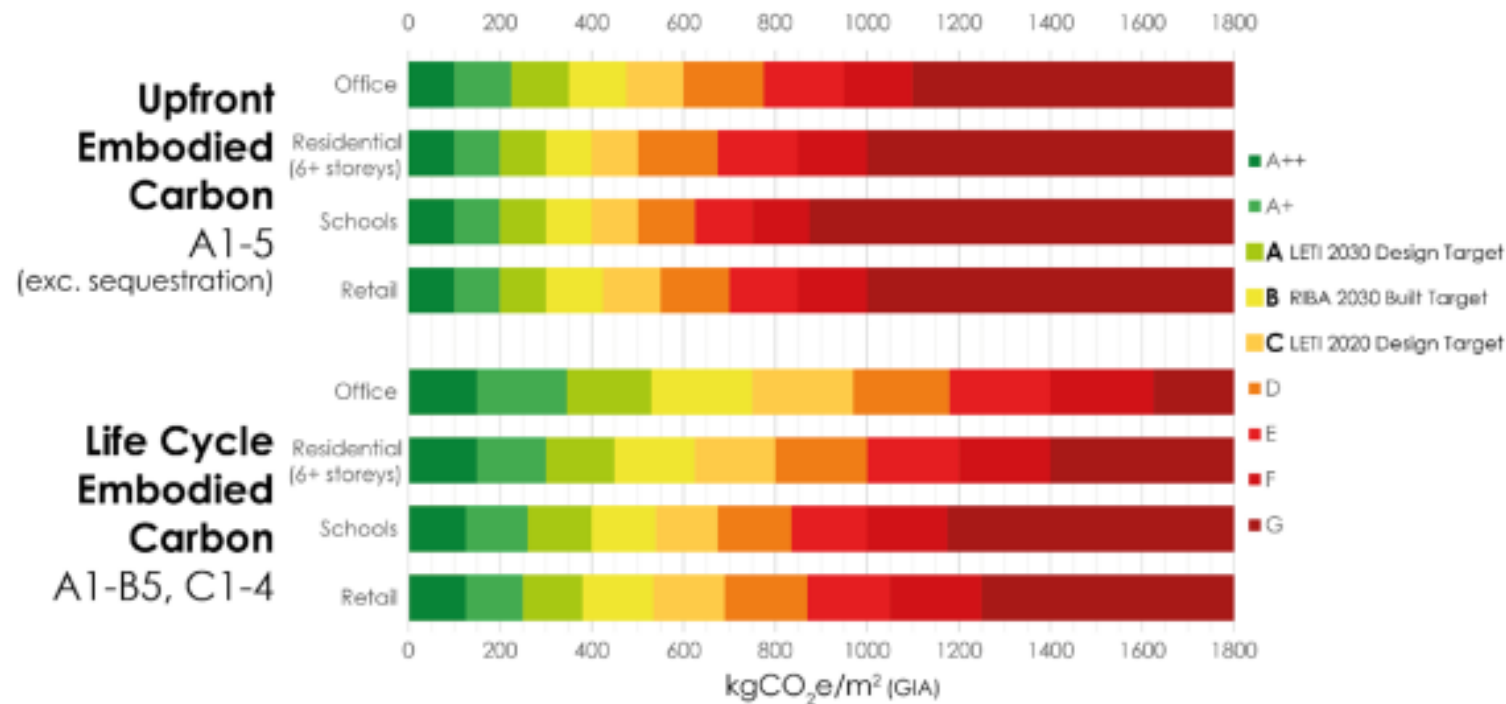
## Draft policy part 2: Embodied carbon



**CITY  
PLAN**

- Applies to all major schemes, and all applications involving substantial (50% or more) or total demolition.
  - RIBA build target
  - LETI benchmarks
  - Bespoke targets for fast-track affordable housing scheme
- Final benchmarks TBC
- RICS methodology/UKNZ Building Standard
- Whole-life carbon assessment
- Currently considering the role of carbon offsetting

# Embodied carbon benchmarks cont.



Graphic showing the embodied carbon letter bandings for four typologies

## **Build cost and feasibility study:** Preliminary findings

- **Office and mixed-use (10,000sqm):**
  - Leti Band C attainable for most schemes
  - Leti Band B attainable as a stretch target
- **Residential (7 storeys):**
  - Leti Band D attainable for most schemes
  - Leti Band C attainable as a stretch target
  - Lower density residential less carbon intensive

## Draft policy part 3: **Unlocking retrofit**



- Set out a presumption in favour of responsible retrofit.
- Tip the balance slightly on environmental considerations vs design/heritage/townscape when considering responsible retrofit.
- View more favourably extensions (in-fill or upwards) which are required to facilitate retrofit.
- Give clarity to applicants over retrofit.

## **Extensions:** policy to support innovation and good growth



- Retrofitting buildings requires innovative and creative thinking.
- City Plan to take a more supportive approach to extensions which facilitate retrofit when considering townscape/design.
- New sections of buildings can support higher spec office space and provide capital cost for retrofits.
- Facilitates floorspace growth through retrofit.



## Explicit support for responsible retrofit



- **Responsible Retrofit:** clear guidance and definition of what is considered responsible retrofitting – which if followed should result in favourable planning decision.
- **Guidance:** further guidance in a revised Environment SPD, and possibly a retrofitting guidance note produced with the Retrofit Taskforce.

## Wider retrofit programme



- Retrofit task force
- New guidance for historic buildings
- Archetypes based guidance
- Local Area Energy Action Plan

Questions in chat....

# Thanks!

- We will circulate an informal response to the points raised in this workshop
- Further feedback by **22<sup>nd</sup> December 2023**
  - [Planningpolicy@westminster.gov.uk](mailto:Planningpolicy@westminster.gov.uk)
- Formal Reg 19 next year

