



Westminster City Council
City Hall
64 Victoria Street
London
SW1E 6QP

10 October 2025

Dear Sir / Madam,

Westminster City Council – Retrofit First Policy Guidance – Response to Consultation

I am writing on behalf of the Westminster Property Association (WPA) to respond to the consultation on Westminster City Council's Retrofit First Policy Guidance. We appreciate the opportunity to review the draft Guidance and share our comments.

Over the last two years, we have engaged closely with you on your Retrofit First Policy (Policy 43) included as part of the Partial Review of the City Plan. During this process we have welcomed the constructive and detailed discussion with officers, however, despite this intense engagement and compromises by both parties, this policy remains the most challenging aspect of delivering long-term and sustainable development. Our members continue to tell us that it is the biggest barrier to delivering economic growth in Westminster.

We have long advocated for a 'Retrofit First, Not Retrofit Only' approach and our report ([Retrofit First, Not Retrofit Only: A focus on the retrofit and redevelopment of 20th century buildings](#)) clearly demonstrates that whilst retrofit is often the optimal route to delivering low carbon development, it is not always the most appropriate or viable option to providing sustainable development. Where a site cannot meet development plan requirements from refurbishment, redevelopment can, and should, be justified. Redeveloping a building is becoming increasingly low carbon as the industry continues to innovate and invest in new ways to reuse materials, dismantle structures and trial low carbon technology. In this context, we welcome the change made to Step 2 of the Guidance to make it clear that sites are required to make the best, most effective use of land in line with development plan objectives, including through redevelopment where necessary.

Following our recent engagement on this draft Guidance we still have a number of specific concerns which are set out in detail in our response. In summary these are:

- The complexity and volume of information to be submitted at each step of the Sequential Test, even where applicants are not relying on that step to justify more extensive development. Some of this information will not normally be available at planning stage or will be commercially sensitive. We would support the clarification that applicants only need to provide the information they are relying on to justify substantial demolition;
- The suggestion that public benefits used to justify the application of Step 4 must go beyond the minimum requirements of the development plan, thereby discounting the possibility that compliance with the plan itself could constitute a public benefit;



- Requirements that, in some circumstances, other sites are considered as potential alternatives for redevelopment, going considerably beyond draft policy which does not set such a requirement;
- The limited flexibility for applicants to deal with changes at post-determination stage, given Westminister's complex urban environment. It is likely (and almost inevitable) that investigations will be made on sites which are unable to be accounted for at planning application stage. We therefore request that any planning condition wording allows for a margin of flexibility to ensure that post-determination development projects are able to progress.

Our detailed response to the consultation is in Appendix A (below). We look forward to continuing to engage with you on behalf of our members on these critically important issues which will determine future development, and the economic growth and wider societal benefits which flows from that, in Westminister.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Charles Begley', is written over a light blue horizontal line.

Charles Begley
Chief Executive, WPA



Appendix A

The below is a list of identified inconsistencies throughout the document and a non-exhaustive list of locations where they occur.

1. Introduction

Location	WPA Comment
Title Page and Paragraph 1.1.1	We understand from discussions with officers that the City Plan is intended to be adopted in October 2025 and that the updated Environment SPD (ESPD) will be adopted following the adoption of the City Plan with the Retrofit First Guidance document as an appendix. Officers have confirmed that as the Retrofit First Guidance document would form an appendix, no further updates to the ESPD would be required.
Paragraph 1.1.3	We support the references in Paragraph 1.1.3 to the ability of development to contribute to sustainable development and economic growth through the provision of sufficient commercial floorspace and agree “that in some cases, the structural condition of buildings may prevent retrofitting, risking buildings being vacated and becoming stranded assets. A balance is therefore required between prioritising retrofitting and, where this is not possible, delivering high quality, world-leading new buildings.”
Figure 1.1.	We agree with the inclusion of Figure 1.1 which sets out the Circular Economy hierarchy but suggest that the definitions of retrofit and demolition etc. are included with the graphic as these are crucial to understanding the application of the policy and informing initial design investigations, and would make the document easier to use. We further request that the Pre-Deconstruction Audit is added to the table of deliverables for completeness and clarity.
Paragraph 1.2 and Page 52	We note that details on the proposed embodied carbon offsetting will be set out in the Planning Obligations and Affordable Housing SPD (POAH SPD). We understand from discussions with officers that WCC intend to consult on the updated POAH SPD later in 2025 and will confirm any interim arrangements as part of this.
Table 1.1	We are supportive of the explicit confirmation that change of use applications resulting in no demolition do not trigger the submission of Pre-Redevelopment Audits, Circular Economy Statements or Whole Life Carbon Assessments.
Paragraph 1.2.4 (Page 10)	The paragraph states “developments where any demolition has occurred.” We understand from discussions with officers that this would not apply to cleared sites which had been acquired by applicants following demolition but would refer to any circular economy measures proposed for the new building such as the use of material passports. We support this approach.
Paragraph 1.2.4 (Page 10)	The reference to Circular Economy Statements being required where any demolition has occurred is not consistent with Table 1.1 which does not require a Circular Economy Statement for Retrofit or Retrofit + Extension schemes resulting in minor



	demolition. We suggest that the reference to Circular Economy Statements is amended to be consistent with Table 1.1, such that statements are not required where there is minor demolition.
Paragraph 1.2.4 (Page 1)	Whilst we are in agreement that Circular Economy Statements (CES) are currently required under the City Plan and London Plan, we consider that the Guidance should be clear that the scope of these documents is increasing as a result of the Retrofit First Policy (Policy 43). Indeed, Page 40 confirms that the CES would have “additional requirements specific to Westminster.”
Paragraph 1.2.5	We request that this paragraph is adjusted to explicitly confirm that changes of use are exempt from the requirements to comply with the upfront embodied carbon limits.

2. Pre-Redevelopment Audit

We note that no further paragraph numbers are included in the following chapters and request that this be updated in the final version of the document.

Topic	Location	WPA Comment
Pre-Redevelopment Audit	Third paragraph of Page 13	The paragraph states that “all applicants proposing substantial demolition must sequentially follow the tests in the policy. Applicants do not need to demonstrate that they meet all of the tests but rather follow the order of the tests until they meet the relevant evidential requirements to justify substantial demolition.” We continue to have concerns about the extent of information required to be provided for Tests which the applicant is not relying on to justify substantial demolition. We set this out in more detail in respect of each test, below. Following discussions with officers, we would support clarification in the Retrofit First Guidance document which confirms that on the principle, it should be that the applicant provides sufficient relevant information to justify their case for substantial demolition.
Masterplans	Fifth paragraph of Page 13 and Page 28	The paragraph states that “sites involving masterplans, or multiple buildings, will need to provide rational for each individual building over a single storey that is proposed for demolition.” We do not consider this is a strategic approach to large-scale regeneration schemes which are in themselves strategic, long-term proposals for complex sites. It does not seem practical to require at least half of <i>each building</i> to be retained to avoid following the Sequential Test. Masterplans, multi-building and estate-wide development should be able to adopt a strategic approach to the extent of fabric retention, with the Sequential Test applied where more than half the existing fabric is to be replaced. This would make the application of the policy to larger sites more streamlined whilst still prioritising fabric retention.



		We also do not agree with the requirement for existing masterplans, which have already been agreed with the Council prior to the adoption of the Retrofit First policy, to provide a statement outlining how the design has been reviewed to make the most effective use of existing buildings. We consider that approved schemes cannot be retroactively assessed against the requirements of the Retrofit First policy.
Best Alternative Scenarios	Table 2.2, Page 17	We request clarification on how the proposed approach would apply to a single sites containing multiple buildings: “The best alternative should typically be an option that retains at least 50% existing GIA whilst maximising the total GIA of the development for the site.” We would support an approach that considers the floorspace of the site as a whole, rather than at an individual building level in order to deliver cohesive schemes, as described above.
Third Party Reviews	Page 18, Figure 2.1, Page 21, Page 37	We agree that third party reviews will be commissioned and managed by WCC at the expense of the applicant and that the reviewer shall be appointed at the earliest possible stage. We agree that a third-party review of Tests 1 (structural) or 3 (whole life carbon), <i>where they are being relied upon by applicants to justify substantial demolition</i>, is appropriate and proportionate due to their technical scope. We support the position on Page 18 that third party reviews for Tests 2 (design and access requirements) and 4 (public benefits) will generally not be required. This is not consistent with Figure 2.1 (page 14) which indicates Test 2 would require third party review (see asterisk). We do not support the widening of the requirements for third-party reviews. The requirements for review are inconsistent throughout the document and should be reviewed.
Third Party Reviews	Page 18, Page 31	We agree with the requirement on Page 18 that reviewers must be independent from the applicant’s team but do not agree that reviewers cannot be involved in any other ongoing projects for the applicant. Given the specific scope of review and given the number of schemes an applicant may be working on at any given time, we do not agree this is reasonable and risks creating monopolies or significant capacity constraints, as this work is often undertaken by large multidisciplinary engineering firms. We understand from discussions with officers that the Retrofit First Guidance document will be updated to clarify that third party reviews will be undertaken in accordance with the established procedures in WCC which would not require third-party reviewers to be independent of all schemes by an applicant. We welcome this approach. From discussions with officers, we understand that third-party reviewers will

		be appointed by WCC as early as possible in the pre-application stage and will be in attendance for pre-application meetings. We continue to have concerns about the level of information required to be provided to third-party reviewers – especially at early feasibility stages of proposals – as this information may be commercially sensitive, which could present a barrier to development in Westminster and add further to the cost of pre-application engagement. We would therefore support an approach, as set out above, which clarifies that the onus is on the applicant to provide sufficient information to justify their case for substantial demolition.
Test 2 of the Sequential Test	Table 2.1	It was previously agreed that Test 2 was optional as set out in the agreed Statement of Common Ground between WPA and WCC dated March 2025. We acknowledge that WCC has sought to clarify this but would request that the wording is more clearly updated to “Test 2 is optional unless being relied upon to justify substantial demolition.”
Sequential Test	Second paragraph on Page 17	We agree with the second paragraph on Page 17 that “applications which do not trigger the amount of demolition defined as ‘substantial’ do not need to meet the Sequential Test and will therefore not need to produce a Pre-Redevelopment Audit” and request that this is set out earlier in the document for clarity. See our comments on Page 10, above.
Number of alternative scenarios	Fourth paragraph on Page 17, Table 2.2 and Table 2.5	We do not agree with the fourth paragraph on Page 17 that requires “at least two alternative schemes” to be assessed and that the “number of schemes to be compared will depend on the outcomes of pre-application advice.” This is contrary to the previous version of the Retrofit First Guidance which confirmed at Table 2.2 (Page 18) that only two alternative options were required to be assessed for new build schemes. This was re-confirmed as part of the agreed Statement of Common Ground signed by WPA and WCC dated 24 March 2025. We therefore do not agree with Option 4 of Table 2.2 which states that “The applicant may propose, or be asked to include, a further option if it is considered necessary to justify substantial demolition using for Test 3 or Test 4.” From further discussions with officers, it is understood that the text will be clarified to confirm that only two alternative schemes are required. A key area of concern for WPA has been the cost, resourcing and timescales associated with testing a wide variety of alternative options. It should generally be possible during – and an objective of – the pre-application process to agree appropriate comparators.
Definition of demolition	Figure 2.2 and the first paragraph on Page 17	The definitions of ‘demolition types’ do not align with the definitions in the glossary and previously agreed between WPA and WCC. We request that it is made explicit that partial demolition refers to greater than 10% and up to and equal to 50% and that substantial demolition is greater than but not equal to 50%. From further discussions with officers, WPA understand that this will be updated. WPA support this.



Decision Criteria	Page 22, 27, 33 and 37	WPA consider that the references to 'decision criteria' are superfluous and should be removed. The decision criteria are the text of the policy. As drafted, they could be interpreted as introducing additional quasi-policy tests: • Page 22: reference to case studies for similar buildings is introduced. • Page 27: there is reference to requiring marketing data for comparable buildings and the consideration of alternative uses, and a suggestion that development where and end user is identified will be treated differently to those that are expected to be multi-let or where end users are not known. • Page 27: There is reference to considering alternative development sites, which is not a requirement of policy.
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3. Chapter 1: Structural condition

Topic	Location	WPA Comment
Structural Condition	Second paragraph of Page 20	We agree with the second paragraph of Page 20 that "if the structural condition is such that retaining the building is not considered feasible by a suitably qualified structural engineer, or if works required to repair and upgrade the structure are prohibitive to a viable development of the building, substantial demolition may be considered using this policy test and evidence to meet other tests is not required."
Content of Test 1	Table 2.3	We note that the level of detail required to be set out in Test 1 of the Pre-Redevelopment Audit is significant and may not be known at pre-application stage due to a number of reasons, including lack of access to the buildings i.e., vacant possession has not yet been achieved. WPA request that all information is caveated to be "insofar as known" and request that applicants are not penalised where they are unable to provide information. Indeed, Page 42 recognises that "at application stage there are often limits to what it [sic] reasonably available information relating to a building, particularly in relation to the existing structure." It is unsustainable and not in Westminster's best interests for planning application requirements to require such intrusive investigations that a property must remain vacant for an extended period. This would lead to the inefficient use of buildings and the adverse effects associated by longer-term vacant assets.
Financial Viability	Page 21	We agree with the reference on Page 21 to "evidence that the proposed level of demolition is unavoidable either due to: unsafe condition of existing structure or financial viability of repair and upgrade requirements."



4. Chapter 2: Requirements of Use

Topic	Location	WPA Comment
Selection of Development Sites	Second paragraph of Page 23	We do not agree with the assertion in the second paragraph of Page 23 that “strategically, development sites should be selected that align with both local needs and locational requirements (as outlined in the Development Plan), along with the need to maximise the retention of buildings.” Development sites are not “selected” in the way this suggests. The availability of sites for investment, whether for refurbishment or redevelopment, is a function of lease and ownership structures; these determine whether a site is available. The vast majority of buildings will not be available for development at any given point due to ownership and occupational constraints. Applications should be considered on their merits, not via comparison with other sites that the local authority may consider is preferable. We therefore request that this sentence is removed. From further discussions with officers, we understand that this will be addressed. We would support the removal of this sentence.
Best Use of Land	Fifth paragraph of Page 23	We support the inclusion of the fifth paragraph of Page 23 which states that “the Development Plan seeks to ensure that development within Westminster makes the best use of land, and it is recognised that in some instances this may be challenging to achieve through retrofit. The following guidance will be relevant when considering the retrofit policy support for achieving best use of land.” We request that this is included in the introduction of the document for clarity.
Best Use of Land	Third paragraph on Page 24	We strongly agree with the requirement to make the best, most effective use of land in line with Development Plan objectives for sites and welcome this inclusion. We query, however, the use of the ‘tall building’ terminology and its title does not accurately reflect the spirit of the paragraph which relates to the underutilisation of sites. Many, if not most, sites in Westminster may be capable of more efficient use without being suitable for tall buildings as usually understood. We request that this paragraph heading is changed. Alternatives could be “underutilised sites” or “appropriate densification.” We would be happy to discuss suitable wording with officers.
Flexible Floorplates	Third paragraph of Page 25 and Page 28	We do not agree with the assertion that “design requirements relating to operations, which lead to inefficient design, such as maximal flexibility of all functional parts of the building, will not generally be sufficient to support substantial demolition. Where such requirements are relied upon to support demolition, these need to be evidenced through a contractual agreement between the applicant and their potential occupiers specifying operational needs.” In the first instance, flexible floorplates are one design feature to futureproof buildings to facilitate different uses through its functional lifespan in order to support sustainable development and ensure high quality,



		attractive space, as required within the Central Activities Zone (CAZ) to meet evidenced occupier demand. It is vital that planning policy is applied to promote a globally competitive CAZ, supporting the internationally important agglomeration of commercial uses, in accordance with Policy SD4 of the London Plan. An incoming occupier is not always secured during the planning process and agreements are often finalised at post-determination stage. We strongly believe this effectively prohibits speculative redevelopment, which would likely present an additional barrier to development in Westminster. Instead, We agree with the requirement on Page 26 that “for speculative developments, operational needs (including any need for flexibility) should be evidenced by a market study showing strong market demand for the proposed use and/or contractual agreement between the applicant and potential occupiers.” We suggest the following proposed adjustments: “speculative development should not result in over-engineered design which would result in increased upfront embodied carbon impacts, where this cannot be robustly justified.”
Development Plan Requirements	Table 2.4	We request that “consideration of other proposed uses which would enable the retention of more of the existing building is contextualised with the following: “within the context of the Development Plan requirements for the Site.”
Test 2 requirements	Table 2.4	We request confirmation on whether both “confirmation that the existing building cannot be retrofitted to a standard that could facilitate the operations of the proposed use” and “confirmation that the clear height between the top of the floor slab to the underside of the floor slab soffit are not sufficient for heating, cooling and ventilation requirements” are required or whether one would be sufficient for the purposes of Test 2. From further discussions with officers, it is understood that this is “either” and request that the document is updated to reflect this.
London Housing Design Guide	Page 27	We request that the London Housing Design Guide is included on Page 27 in addition to Nationally Described Space Standards given the City Council’s location in London.
Alternatives Sites	Page 27	We <u>strongly oppose</u> the reference to “whether alternative sites could provide the proposed use through retrofit approaches, with less demolition than proposed.” The planning system seeks simply to assess a proposal against the Development Plan requirements for the Site and where there are departures from the Development Plan to weigh these in the planning balance against material considerations.



		<u>The planning system and the planning framework in England does not generally require applicants to assess alternative sites except where set out in policy. There is no requirement in Policy 43, or elsewhere, to consider potential alternative sites in this scenario. It is essential that this requirement is removed.</u>
Alternative Options	Page 28	We do not support the consideration of less carbon intensive construction options within Test 2 (design and access requirements), as this is dealt with as part of Test 3 (whole life carbon).

5. Chapter 3: Carbon Options Appraisal

Topic	Location	WPA Comment
Deliverability	Page 29	We support the confirmation that only development options which are deliverable need to be assessed for the purposes of Test 3 (whole life carbon).
EUI	Page 29	We note the requirement for applicants to assess options on the basis of Energy Use Intensity (EUI). WPA note that EUI assessments are not adopted policy requirements for either the City Plan or the London Plan but acknowledge that they can provide a more accurate reflection of energy efficiency than Part L calculations. We request that the reference is updated to make it clear that the use of EUI for calculations is optional. We further consider that higher EUI performance should be accepted for retrofit schemes in order to encourage greater retention.
Circularity Scores and Embodied Ecological Impacts	Page 29, 32, 34 and 36	We oppose the requirement to assign Circularity Scores and assessed Embodied Ecological Impacts as the Retrofit First Policy (Policy 43) is clear on the requirement to assess and compare Whole Life Carbon performance for up to three scenarios (the proposed scheme and a maximum of two alternative options). We request that references to Circularity Scores and Embodied Ecological Impacts are relocated to Test 4 as examples of potential public benefits, as discussed and agreed with officers.
Outcomes of Whole Life Carbon Assessments	Page 32	We consider that the final two bullet points on Page 32 are superfluous – one requires the WLC of the proposed scheme to be “highly likely to be lower than the best alternative scheme” and the other requires the WLC of the proposed scheme to be “sufficiently lower carbon (with a reasonable margin of error than other proposed options (i.e., it should be beyond reasonable doubt).” We support the use of the first bullet point.
Upfront Embodied Carbon	Page 33	We request that “the upfront embodied carbon of the proposed option is aligned with WCC upfront carbon limits, where relevant” is removed. Notwithstanding our position on decision criteria, set out above, we request



Performance		that reference to the upfront embodied carbon limits is removed from Test 3 (whole life carbon). The requirement to meet the upfront embodied carbon targets is set out at Part G of the Retrofit First Policy (Policy 43) and is only triggered once applicants have successfully justified substantial demolition through the Sequential Test. Test 3 deals with whole life carbon rather than simply upfront embodied carbon. Indeed Page 33 states that the Whole Life Carbon Assessment required by Part G of the policy is required to demonstrate compliance with the upfront embodied carbon limits and that “this requirement is therefore separate to the Carbon Options Appraisal. As such, the results of the carbon options appraisal do not necessarily need to show that the scheme can meet the upfront embodied carbon requirements stipulated in the policy.”
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6. Chapter 4: Public Benefits

Topic	Location	WPA Comment
Scope of Public Benefits	Page 34	We agree with the use of the definition of public benefits set out in the National Planning Policy Framework which covers economic, social and environmental benefits and welcome the inclusion of this definition.
Proportionality of Public Benefits	Page 33, 34	We agree in principle that the public benefits of schemes proposing substantial demolition should be significant and proportional to the relative carbon impacts of the proposal. <u>We do not agree that public benefits will need to be demonstrated to exceed the minimum policy compliant requirements. A policy compliant development may well provide significant public benefits, policy being set to deliver such benefits. Furthermore, it is not possible to know that the alternative option(s) identified in previous steps are deliverable. The retrofit and deep retrofit options (Table 2.2) may still not be deliverable particularly if they do not provide the standard of accommodation necessary to deliver the site. In these circumstances, the redevelopment option may be the only deliverable development.</u> As agreed previously between WPA and WCC and captured in the Statement of Common Ground dated March 2025, public benefits do not need to exceed those of the Development Plan to constitute public benefits, as established by the recent combined judgement handed down in August 2024: <i>Vistry Homes Ltd vs SSLUHC</i> and <i>Fairfax Acquisitions Ltd v SSLUHC</i> [2024] EWHC 2088. From further discussions with officers, it is understood that the above will be clarified. We support this. We does not understand the suggestion that “the additionality of the public benefits corresponds to the circular economy hierarchy” (page 35) and



		understand that officers will review and clarify.
Social / Infrastructure Benefits	Page 35	We consider that the provision of publicly accessible greenspace would constitute a public benefit even outside of open space deficiency areas as a public good. We request that this section is updated to reflect.
Economic Benefits	Page 36	We support the economic public benefits listed but request that reference to the Central Activities Zone ('CAZ') is included in the supporting text rather than a footnote for clarity.

7. Circular Economy Statements

Topic	Location	WPA Comment
WCC Suggested Circular Economy Targets	Page 40	We support the clarification on Page 41 that any WCC suggested targets are <u>not</u> mandatory and are simply included to guide applicants and encourage reclamation and reuse. We consider, in particular, that the proposed requirement for 50% of materials by mass/value to have digital material passports could prove challenging in the short term. We consider that any schemes which achieve or exceed the targets should be weighed in the balance as a public benefit.
Post-determination Matters	Page 42	We note the assertion that "the council will use conditions to secure the commitments made by applicants at planning application stage, and expect development to be carried out in accordance with the levels of demolition and retention provided during the application stage." We agree that some controls over the extent of demolition and circular economy outcomes are required. These should, however, be based upon achieving the required targets or levels, not conditioning achieving specific figures set in the application. Given the complex urban environment within the City of Westminster, it is likely (and almost inevitable) that investigations will be made on site which are unable to be accounted for at planning application stage. We consider that the proposed Retrofit First Guidance does not provide sufficient flexibility to allow for design evolution at post-determination stage. We request that any condition wording allows for flexibility to ensure that post-determination development projects are able to progress and deliver the development required in the City of Westminster. WPA and WCC have agreed to further discuss appropriate condition wording in due course.
Post-determination Matters	Page 42	As above, we oppose the suggestion on Page 42 that "if a pre-redevelopment audit is not provided due to the proposal not meeting the Council's threshold for substantial demolition, the proportion of building retention at planning application stage will be secured by condition" unless the planning condition is suitably flexible to allow for movement at post-determination stage. This



		could be achieved by conditioning against exceeding the thresholds for the next stage of definitions (subject an appropriate buffer), rather than requiring a set percentage retention. It is therefore agreed that “a variance on this figure would not trigger any post-permission matters, providing that the level of demolition does not exceed 50% of floor area or constitute a material change to the nature of the development scheme.”
Post-determination Matters	Page 42	We are concerned at the suggestion that “where the proportion of demolition materially exceeds the 50% policy threshold, depending on the extent of additional demolition, applicants may be required to submit a pre-redevelopment audit to justify the new building.” We suggest further discussion on this point, to ensure that modest changes in retention plans during detailed design do not potentially risk the principal of the permission.
Sequential Test	Page 42	We do not agree with the assertion that “where a pre-redevelopment audit is provided, applicants should be providing evidence to demonstrate that the demolition would be supported by Test 1 or 3 of the sequential test. The principle of the design of the new building does not need to be revisited, except where an alteration or extension was justified under Clause H or the retrofit policy as required to viably deliver a retrofit.” We understand that a Pre-Redevelopment Audit is required for any substantial demolition and can be justified by any Test and as such, request that this paragraph is removed.
Page 44	Page 45	We consider that a Pre-Deconstruction Audit should only need to be submitted prior to the commencement of any works in the event that additional information has become available post planning, as Page 44 confirms that a Pre-Deconstruction Audit is required to be submitted in support of the planning application.

8. Upfront Embodied Carbon Requirements

Topic	Location	WPA Comment
PACER Platform	Page 50	We understand that Whole Life Carbon Assessments submitted using the PACER platform will not be third-party reviewed for either Test 1 or 3 and request confirmation of this from WCC.
Upfront Embodied Carbon Limits	Page 52	We request that it is clarified that only all “relevant” developments will be subject to upfront embodied carbon requirements
Future Updates	Page 54	We support the clarification that any future updates to the upfront embodied carbon limits will remain indicative as the limits would need to be subject to consultation and Examination in Public.
Planning Conditions	Page 56	We strongly oppose the reference that “planning conditions will be used to ensure that the upfront embodied carbon of the schemes does not exceed that of the retrofit scheme identified in the carbon optioneering.” The National



		Planning Policy Framework is clear that planning conditions may only be imposed where they meet the following tests: - Necessary - Relevant to Planning - Relevant to the Development Permitted - Enforceable - Precise - Reasonable in All Other Respects The Sequential Test allows for development which has a greater Whole Life Carbon that a scheme with less retention provided it is robustly justified against Test 1, 2, 3 or 4. <u>We consider it is completely unsound to attach planning conditions in respect of alternative optioneered schemes and request that this reference is removed.</u>
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9. General

Location	WPA Comment
Third paragraph of Page 23	We query whether “it may be necessary” needs to be removed.
Sixth paragraph on Page 23	Should read “storey” not “story.”
Third paragraph on Page 27	Should read “form” not “forum.”
Page 31 and 32	We request that consistent terminology is used for Whole Life Carbon methodologies. Page 31 refers to RICS Whole Life Carbon Assessment (WLCA) Standard, 2 nd Edition and Page 32 refers to RICS PS 2023 guidance. The formal title is RICS Professional Standard Whole life carbon assessment for the built environment 2 nd Edition September 2023.
Fourth paragraph on Page 34	Should read “compliant” not “complaint.”
Fourth paragraph on Page 42	Should read “developments” not “development’s.”
Page 43	Refers to a “pre-development audit” – should this read “pre-redevelopment audit”?
Page 52	Should read “fewer materials” not “less materials.”