

Cllr Geoff Barraclough
Westminster City Council
City Hall
64 Victoria Street
London
SW1E 6QP

21 December 2023

Dear Cllr Barraclough,

Re: Westminster City Council draft Retrofit Policy – response to informal consultation

As you are aware the WPA shares the aspirations and objectives of Westminster City Council to achieve net zero carbon by 2040. As well as our collaboration with you on the pioneering [Sustainable City Charter](#), our members are moving at pace to deliver high quality sustainable space in order to meet occupier expectations. Indeed, the commercial office market is innovating faster than many other sectors to meet demand, as well as companies' own ambitious Net Zero targets. Investors are also increasingly discerning in regard to the allocation of funds, invariably tying this to sustainable development.

The current partial review of Westminster's City Plan is tasked with enabling development alongside a host of environmental, social and economic policy objectives, and it is imperative your emerging policies get the balance right. We are concerned that the current **draft Retrofit First and Embodied Carbon policy fails to do this** (appended for reference as we understand this is being refined in light of initial feedback). It also risks being non-compliant with the London Plan, which we set out in a detailed submission below.

High quality, sustainable office space is in chronically short supply, driving rents up, whilst major planning applications in Westminster have fallen 75% over the past six years – a sure sign that investment is being held back. The WPA supports the principle of retrofit first, but this must not, however, preclude replacing buildings in some circumstances.

Some buildings are not suitable for retention because they cannot provide space of the quality that is necessary and/or do not optimise the capacity of sites. They risk becoming un-used, or under-used, if they cannot be replaced. This would lead to the unintentional, managed decline of Westminster as a key employment destination and contributor to the UK's economy, which the WPA would not support. The draft policy does not address this issue and the WPA is concerned that the direction of travel may not be in general conformity with the London Plan.

The WPA welcomes the proposed use of carbon budget. It looks forward to working with the City Council to ensure that budgets are set that are stretching, yet achievable, and are accompanied by clear guidance.

We welcome the early engagement on this critically important policy, and look forward to discussing the content of this letter with you and officers in the New Year as we work towards agreeing a clear and deliverable framework to guide and support crucial planning and investment decisions.

If you have any questions in the meantime, please do not hesitate to contact me.

Yours sincerely,



Charles Begley
Chief Executive, Westminster Property Association

Summary Position

The WPA supports a “retrofit first, not retrofit only” approach, as set out in our research paper of the same name, available online [here](#).¹

The WPA welcomes increased policy support for the retention of existing building stock to reduce uncertainty within the development industry. The WPA is keen to ensure that any forthcoming policy delivers a clear and workable solution which unlocks and promotes the retention and refurbishment of buildings, where possible, through a proportionate framework for the assessment of proposals. This must recognise that the retention of buildings is not always possible and does not always optimise economic, social and sustainability benefits.

The WPA’s view is that the draft policy does not, yet, achieve this shared objective of providing a clear and deliverable framework. It has significant reservations over aspects of the draft wording. It is therefore keen to continue to work with the City Council on further development.

The WPA’s concerns rest on the fact that there will be circumstances where it is appropriate to replace buildings. The draft policy must recognise this. The circumstances in which a building can be replaced suggested by the current draft are too narrow at present. The policy is close to “retrofit only.” The WPA is concerned that, as drafted, this would lead to managed decline in central London’s vital economic infrastructure.

Shared Vision and Objectives

As part of its Partial Review of the Westminster City Plan 2019-2040, the City Council is reviewing and strengthening planning policy on topics, namely affordable housing, site allocations and the retrofitting of existing buildings. To this end, officers have prepared a retrofit-first policy to encourage the reuse and refurbishment of buildings within the City and seek to minimise unjustifiable demolition and redevelopment.

The WPA acknowledges that the inclusion of specific embodied carbon targets and carbon budgets can provide further clarity to Applicants. It supports the use of budgets, which have already been effective in driving down embodied carbon. The WPA is not persuaded that the suggested targets are set at the appropriate level – especially relating to whole life carbon – as they appear to be unachievable in almost all cases. We also request further detail, and testing, of the targets, methodologies and guidance for assessing development proposals to ensure they are sufficiently robust.

The WPA supports recognising that the retention of buildings and, reduction of carbon emissions, should be a factor that is considered when proposals for alterations and extensions come forwards.

Detailed comments

The draft policy is divided into three parts. Part A seeks to set controls on demolition and clarify instances where demolition may be acceptable subject to robust justification. Part B looks to set carbon targets on any proposals involving total or substantial demolition and Parts C&D provide policy support for the retrofitting of existing buildings, including providing policy support for extensions or alterations which unlock the wider retrofit of the building.

Our response has been prepared to respond to each part of the draft policy in turn.

Part A – Controlling Demolition

Definition of demolition

¹ Retrofit First, Not Retrofit Only: A focus on the retrofit and redevelopment of 20th century buildings, London Property Alliance and JLL, 2022, online at <https://www.londonpropertyalliance.com/retrofit-first-not-retrofit-only-a-focus-on-the-retrofit-and-redevelopment-of-20th-century-buildings/>

It is important that a clear definition of “total demolition” is provided, so that applicants, and the City Council, are clear on when the policy is engaged. The WPA suggests that “total demolition” is defined as:

“the removal, deconstruction or demolition of all of an existing building, which will entail the removal of all of its fit out, façade, superstructure, cores, and basement slab(s).”

It should be clear that proposals for the structural alterations of buildings, or indeed for the deep retrofit of buildings where there is some structural change or the removal of material, are **not** required to address Part of A of the policy. Ensuring this distinction is made would give clear priority to retrofit proposals.

Substantial demolition

Reference to “substantial demolition” should be removed. This is subjective and unclear. For example, the removal of a plant enclosure, or the top mansard floor of a building, will entail “substantial” works and potentially the demolition / removal of structure. Most retrofit developments will entail some fabric removal; the loss of some fabric should not engage the same, Part A, policy tests as comprehensive demolition – this would simply act as an unnecessary brake on any form of development.

The WPA recognises that it will be appropriate to apply carbon budgets, as set out in Part B, to most major developments. Part B would, therefore, be applicable to a wider range of proposals than Part A, including those proposing retrofit. As discussed in Part B in more detail, there may, however, need to be some recognition that some of the carbon budgets and operational targets for development may need to distinguish between retrofit and redevelopment proposals.

Optioneering

The WPA agrees that, where “total demolition” is proposed, an optioneering exercise should be undertaken to assess alternative options. Reference, during consultation, to this exercise being “exhaustive” is, though, a cause of very serious concern. It is essential that the optioneering exercise required is clearly set out by policy or associated guidance. In many cases, there will be an almost infinite configuration of potential design options for buildings, based on a matrix of factors including:

1. The extent of structural retention (for example, the extent of the foundations, basements, cores and structural grid);
2. The extent of façade retention;
3. in some cases, alternative options for the manipulation of those structural elements;
4. the extent of material re-use on, or-offsite;
5. the use proposed for the building and its structural requirements;
6. the proposed material use within the new building, for example the use of concrete, steel and mass timber for structural elements, and the design and build-up of floor slabs (e.g. steel decks vs CLT, etc);
7. alternatives for the M&E strategy, including the use of under floor, ceiling mounted and perimeter servicing.

Policy and guidance should provide clear direction on the alternative options that should be assessed and tested. WPA’s Members’ experience is that, in the absence of this, the option testing that is being sought by the City Council is becoming extremely protracted in some instances. The cost of this to applicants is significant, as well as the resourcing implications for the City Council. It is also leading to considerable delay in decision making. The Association would not support proposals that could lead to undefined or indeterminate optioneering periods.

Exceptional Circumstances

The WPA is seriously concerned by the statement that **“development involving total demolition and redevelopment will generally be resisted, except in the following exceptional circumstances: [...]”**

“Exceptional circumstances” is generally recognised as being the highest bar in planning; it is the language that is used by the NPPF to protect the green belt, to prevent development within National Parks, and to prevent the demolition of listed buildings.²

Introducing the same protection for existing buildings in Westminster is inappropriate and unsound. Doing so would not be in general conformity with the London Plan.

This is because the London Plan is predicated on “Good Growth” principles.

Policy GG2 seeks to “**enable the development of brownfield land...**” and to “**proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in [well located locations].**”

Policy D3 sets out the design led approach. It requires that “**all development must make the best use of land by following a design-led approach that optimises the capacity of sites.**”

Policy SD4 and SD5 of the London Plan relate to the CAZ, and the CAZ office function. Policy SD4 requires central London’s rich mix of uses to be “**promoted and enhanced.**” Its office supply should be “**supported and enhanced.**”

Policy SD4(B) states that the office function of the CAZ should be supported and enhanced by all stakeholders, including “**the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier**”.

Policy SD5 then provides additional support to the development of office and workspace accommodation.

In this context, a policy that would place the same presumption against replacing buildings, in order to meet these London Plan objectives, as is placed on the demolition of Grade II listed buildings or on alterations to the Green Belt, would be in clear conflict with the London Plan. It would not meet the legal requirement of general conformity. It would, conversely, represent a very substantial change in the strategic direction of spatial planning policy for central London, and its emphasis on Good Growth. This would be premature in advance of a review of the London Plan and should be addressed at a regional level.

This change is being brought forward as part of an Early Review of the City Plan, most of which will remain unchanged, including the City Plan’s clear targets on office and employment growth, set out in Policy 13, with which the proposed approach would be inconsistent. It would introduce clear internal inconsistency within the City Plan.

The WPA considers it essential that the reference to “**exceptional circumstances**” is removed and replaced by “**circumstances including:**”.

Criteria for replacing buildings

The circumstances in which buildings may be replaced, at nos 1-3, should also be reviewed. The WPA considers these are unduly restrictive. As drafted, these essentially amount to a Retrofit Only approach, rather than the Retrofit First approach suggested in Part A, which the WPA has long supported.

The WPA supports 1(ii) (whole lifetime emissions from redevelopment being lower than / similar to retrofit). It suggests it may sit more easily as a separate criterion. Additional guidance is needed to set out how this assessment of whole lifetime carbon is carried out, particularly in those areas identified in our response to Part B. The assessment of whole lifetime carbon for this purpose should **include** operational emissions (Module B6 of BS EN 15978:2011), so that the effects of retaining and using an operationally inefficient building and compared with the benefits of investing embodied carbon to reduce operational emissions.

² NPPF, September 2023, paras 140, 177 and 200.

Clarity should also be provided on the degree of optioneering required to be undertaken in the comparison between the whole-lifetime carbon of redevelopment and a retrofit option and the time period against which this comparison is made i.e., 30, 50, 60 or 100 years. As part of this, the design lifetime of the proposed building should be considered. There should be incentives to provide for a design life of more than 60 years, as set out in the current GLA guidance. If developers deliver genuinely flexible buildings, capable of being put to multiple alternative uses over a long period of time, it should not be necessary to comprehensively replace those buildings after 60 years, as is currently assumed. It should, therefore, be possible to make the comparison against whole life carbon over a longer, more realistic, life cycle, where the proposed building is being demonstrably designed for long term flexibility over a longer period.

Further clarity should also be provided so that the whole-lifetime carbon comparison does **not** require a comparison with a 'do nothing' scenario of the existing building. Such a comparison would be contrary to the Retrofit First Not Retrofit Only approach set out by the London Property Alliance and would unnecessarily skew the comparison results.

The WPA recognises that nos 2 (bespoke operational requirements) and 3 (structural constraints) are appropriate and supports their inclusion.

Crucially, policy also must recognise that it may well be appropriate to redevelop buildings in other circumstances. These should include:

1. **Site optimisation.** Where an existing site is under used / under optimised, in the context of the London Plan's requirement to optimise site capacity. For example, if a relatively low building can be replaced, in townscape and architectural terms, with a building of four to five stories, this should be appropriate as it would optimise development density in central London as a sustainable location. However, this would be prevented by the policy as currently drafted.

This is inappropriate and inconsistent with London Plan policy as described above.

2. **Obsolete and compromised buildings.** In the same way, policy should clearly address the obsolescence of buildings and the need to continuously invest in, and upgrade, Westminster's building stock, especially commercial offices. In some cases, it will not be possible to provide the standard of office accommodation required by potential occupiers due to the constraints of the existing building.

Contributors to obsolescence should be specifically recognised, including matters such as floor-to-ceiling requirements. These are a key operational requirement and there is clear leasing evidence of the effect of low ceiling heights. 1960s and 70s buildings were not designed for modern occupation, servicing, layouts, daylight, etc. In general, proposals that cannot provide clear floor to ceiling heights in excess of 2.5m, are unlikely to meet occupier requirements. The WPA notes that this has long been accepted in residential development (which generally have less deep floorplates in any case) and that 2.7m is sought by the City Council's own guidance on affordable offices.

The WPA has provided examples of these challenges in its Retrofit First Not Retrofit Only research paper. It is essential that policy recognise that, where the standard of office accommodation sought by incoming occupiers, and as set out in Policy SD4(B) of the London Plan, cannot be created through retrofit, the redevelopment of the building may be acceptable in principle.

Given the wave of impending building obsolescence that has been identified by the City Council, it is essential that buildings that cannot be successfully retrofitted to provide the type of space that will encourage occupiers to locate to them can be replaced. It will, in many cases, not be deliverable, or economically rational, for a property owner or investor to invest in improving an obsolete building if the quality of the space that could be created would remain fundamentally unattractive to occupiers. Those investors, and occupiers, will have the choice of locating to, or investing in, other parts of London or indeed other global cities. It is not realistic to expect them to choose substandard or poor-quality space in Westminster.

This would lead to a growing problem of obsolete buildings, that potentially become “stranded assets” because there is no economic rationale to undertake the capital investment necessary to ensure that they remain lettable, especially as the Minimum Energy Efficiency Standards for commercial buildings are applied and continue to be tightened.

The inability of Westminster to provide good quality, attractive space to incoming occupiers, especially from leading UK and international occupiers, could seriously undermine its economic offer, and would be inconsistent with Policy SD4 of the London Plan.

Even where buildings are refurbished, if the space is compromised the ability to let the space is highly constrained, leading to a building with more void periods, smaller units of occupation, and a dearth of the larger, and more prominent, occupiers that are essential to the overall mix of uses and Westminster’s success as a leading global employment central that is internationally competitive.

Insisting on the retention of compromised existing buildings that will become increasingly unattractive over time is tantamount to a policy of managed decline. This would be fundamentally at odds with regional policy. It would prevent investment and renewal in a key element of Westminster, and London’s, economic infrastructure. The WPA fears this could lead to a Westminster that, because it is less attractive and competitive globally, realises far fewer opportunities to benefit both its own residents and the wider economy of London.

The WPA suggests that the two scenarios on page 5 above (ie, site optimisation, and obsolete/compromised buildings) are specifically recognised as circumstances where the replacement of buildings will be considered. These should be additional to the recognition of public benefits under 1(i), rather than relying on the importance of workspace being recognised as a benefit on a case-by-case basis.

The WPA recognises that public benefits (as envisaged by 1(i)) may also justify the replacement of a building. It supports this, but considers that it does not go far enough, nor does it provide sufficient clarity and certainty. A public benefit is defined by the NPPF as anything that contributes to the economic, social or environmental objectives of the Framework, but on the basis of the consultation the City Council appears to anticipate a much narrow definition, citing schools and hospitals as examples. This is too narrow.

The WPA suggests that provision of 35% affordable housing is specifically recognised as a public benefit in this context. The WPA also suggests that a more objective assessment of public benefits, potentially based on techniques for assessing social value, could be developed to provide greater objectivity in this area.

Other policy areas

The relationship of this policy with other policies should be more closely considered. For example:

1. **Carbon offsetting.** The relationship with requirements for carbon offsetting should be considered, recognising that retrofit buildings may be less operationally efficient than new build developments. Where it is not possible to further reduce carbon emissions, because doing so would require comprehensive redevelopment, this should be taken into account when setting carbon offset payments requirements. It may be that a lower tariff should be applied in these circumstances. There is a risk of a series of perverse incentives, whereby planning permission is required for works to reduce carbon emissions. Buildings are therefore brought within the scope of planning control, and offset contributions sought as a result for the residual emissions, thus discouraging owners from undertaking those works in the first place.
2. **Other design requirements.** Other objectives, such as cycle parking and loading bay design, may be more difficult to secure in retrofit developments. Policy should recognise that greater flexibility will be appropriate, in comparison with new build development.
3. **Land use flexibility.** The consultation does not address the extent to which flexibility on land use will be considered, where the retention of buildings in the existing use (for example, offices) may be impractical, but other alternative uses, such as residential, student accommodation, hotel or medical, may be able to work

with the existing structure. The WPA considers the extent to which the retention of existing fabric is prioritised over other land use objectives is considered and direction on this provided in the emerging policy. This also has implications for the extent of option analysis that would be required.

Part B – Setting Carbon Targets

Part B of the draft Policy seeks to establish embodied carbon targets for relevant development proposals and to establish the supplementary information and justification required to accompany application for planning permission in this regard.

Scope of application

As set out above, we would advise that reference to “substantial” demolition is removed, as this would vary on a case-by-case basis with a degree of demolition often required to facilitate the successful retrofitting of the wider building in many cases.

We also request that the policy wording is amended to clarify instances of ‘major development’ which would not require the submission of a WLCA. The definition of major development set out within the Town and Country Planning (Development Management Procedure) (England) Order 2015 includes development proposals which seek, for example, a change of use, public realm improvements or result in limited or no structural alterations to a building.

The objectives of the policy to (i) limit the demolition of buildings, except where robust justification can be provided and (ii) promote low carbon building techniques where physical construction is undertaken, are recognised. We recognise the requirement for new build major development, such as new housing, for example, to assess and submit a WLCA is appropriate.

Development that is not involving the demolition of buildings, or extensive physical work to create new buildings, such as changes of use, should not be required to submit WLCA assessments. This would be disproportionate.

Embodied carbon targets

The proposed embodied carbon targets are summarised below alongside the currently adopted GLA targets for ease of reference.

	Westminster Retrofit-Policy (kgCO₂e/m²)	GLA (kgCO₂e/m²)
Upfront embodied carbon (A1-A5)	Minimum C <600 Aspirational B <475	Minimum E <900 Aspirational C <600
Life cycle embodied carbon (A1-A5, B1-B5, C1-C4)	Minimum B <750 Aspirational A <530	Minimum E <1,400 Aspirational C <970

Justification of proposed targets

We note that the proposed targets have been developed by two separate organisations: LETI (London Energy Transformation Initiative) and RIBA (the Royal Institute of British Architects). The policy wording specifies the target bands set by these organisations rather than the numeric targets themselves, which requires Applicants to undertake additional research to determine the correct figures. We would suggest that the targets are themselves integrated into the policy wording as a minimum. The inclusion of specific figures would also preclude a situation whereby LETI or RIBA update their targets, resulting in inconsistencies and uncertainty with any adopted City Plan policy. This would allow subsequent changes to be subject to proper consultation and independent examination in the usual way.

The different targets should be set for different building uses, as RIBA and LETI do currently. It may also be appropriate to consider distinguishing between retrofit and new build.

More generally, LETI are not a statutory body but rather a voluntary organisation of built environment professionals. Whilst the WPA endorses LETI's aim to seek to reduce the carbon emissions arising from development, we would be grateful for further clarification on their methodology used in the calculation of their targets to ensure that these are sufficiently robust and technically sound. This should form part of the evidence base to the new policy.

Attainability of proposed targets

As demonstrated above, the embodied carbon figures proposed within the draft Retrofit Policy are significantly lower than the adopted minimum GLA targets with the whole life carbon figures also lower than the aspirational GLA target. Whilst we support the City Council's approach to encourage innovation and technological advances within the construction industry, we would request that any targets included within the policy are challenging but attainable in the short term and aspirationally achievable in the long term.

We note that the embodied carbon figures proposed are, in practice, principally stretch targets. In respect of the upfront embodied carbon targets (Modules A1-A5), we consider that the minimum LETI 2020 Design Target of <math><600 \text{ kgCO}_2\text{e/m}^2</math> is an appropriate target, which challenges Applicants to maximise opportunities to lower their upfront embodied carbon emissions, whilst remaining achievable through a considered approach to design and structural matters. Nevertheless, constrained sites such as those located above urban infrastructure (London Underground lines or sewers) may struggle to achieve Band C. As such, we recommend that flexibility should be provided within the policy to consider schemes on a case-by-case basis and in light of site constraints. We also request that the use of terminology such as "**absolute minimum**" ratings does not acknowledge the site constraints listed above.

We are advised that the LETI 2030 Design Target of <math><475 \text{ kgCO}_2\text{e/m}^2</math> is almost impossible to achieve and therefore question the value of including stretch targets, which are, and are likely to remain, unattainable. An alternative approach could be the inclusion of a stretch target positioned between <math><600</math> and <math><475 \text{ kgCO}_2\text{e/m}^2</math> provided the target is robustly justified.

In respect of the whole life carbon targets (Modules A1-A5, B1-B5 (excluding B6 and B7) and C1-C4), we are advised that the RIBA 2030 Build Target of <math><750 \text{ kgCO}_2\text{e/m}^2</math> is especially challenging to achieve with the stretch target of <math><530 \text{ kgCO}_2\text{e/m}^2</math> entirely unachievable. As set out above, the retrofitting of buildings often necessitates a degree of demolition. To this end, we understand that a figure of <math><750 \text{ kgCO}_2\text{e/m}^2</math> is itself a stretch target and would be challenging to achieve for even a moderate retrofit scheme (ca. 50% retention).

Whilst we endorse the use of targets, we do not support the Whole Life targets as currently drafted; they require reconsideration.

We consider the minimum whole life carbon target should be reduced to Band C, which equates to the aspirational GLA target of $>970 \text{ kgCO}_2\text{e/m}^2$ with <math><750 \text{ kgCO}_2\text{e/m}^2</math> as a stretch target. This would enable the upfront embodied carbon and whole life carbon targets to be aligned at a minimum of Band C, with an aspirational target of Band B.

We endorse the use of an either / or approach to the embodied carbon emissions targets as this acknowledges the specific requirements and varying structural and operational complexities of each individual building. This approach is helpful for schemes which may comply with the upfront embodied carbon targets but may not necessarily achieve the whole life carbon emissions targets.

However, it is highly unlikely that a scheme would comply with the whole life carbon targets and not the upfront embodied carbon targets. We therefore query the value provided through the inclusion of both upfront embodied carbon targets and whole life carbon targets and recommend that the targets are revisited.

The WPA shares the City Council's aspiration to reduce carbon emissions, but unachievable stretch targets are likely to dissuade investors from even considering development, which may ultimately inhibit rather than promote investment and innovation.

Feasibility exercises

We understand that Westminster City Council has undertaken a feasibility exercise to test the attainability of the draft Retrofit policy wording. We understand however that the case studies included within this feasibility study have focussed predominantly on large office buildings exceeding approximately 10,000 sqm in floorspace. We consider that this feasibility study should be widened to assess a number of smaller buildings, which often have unique and technical challenges. The requirement to expend a high quantum of carbon to retrofit smaller buildings is not uncommon and it is not currently clear that such schemes would be able to comply with the current policy wording. Smaller sites may also result in a higher tenant turnover rate and consequently increased requirements for the refurbishment and repair of building services (with associated embodied carbon impacts).

As part of this feasibility exercise, we request that different building typologies and land uses are explored, which each have specific design and structural requirements, in addition to embodied and operational carbon capacities.

We understand that the feasibility document will be published as part of the City Council's Evidence Base for the Regulation 19 consultation, which is scheduled for early 2024, and request that smaller sites are included in this document to robustly justify the proposed condition wording.

Future flexibility

We anticipate that the emerging carbon budgets will also need to be kept under close review for alignment and compatibility with other guidance in this area, particularly the forthcoming second edition of the RICS Professional Standard for Calculating Whole Life Carbon for the Built Environment, which has now been published and which will come into effect next year.

This may change the approach to emissions associated with the demolition or deconstruction of buildings, and the way in which routine refurbishments or upgrades to buildings are treated.

This should be addressed in the forthcoming policy or associated guidance.

Affordable Housing

We understand that Version 4 of the draft Retrofit Policy contains revised wording in respect of the delivery of affordable housing, which reflects the feedback provided to Officers during its engagement exercises.

We support the updated wording, which more accurately reflects the challenges associated with delivering affordable housing and provides increased flexibility in respect of carbon reductions to better facilitate the delivery of affordable housing within Westminster by prioritising maximising affordable housing delivery.

We suggest two further amendments:

1. That the criterion B(i)(c) refer to development achieving "35% affordable housing" **or** "following the Fast Track route"; there will be some cases (especially estate regeneration) where entry to the Fast Track is automatically prohibited, but such developments should still be enabled to prioritise affordable housing delivery; and
2. That the wording of B(i)(c) is amended so that it is clear that what is being sought is a report that shows embodied carbon emissions have been maximised as far as possible without affecting affordable housing delivery within the design of the scheme. The wording, at present, does not quite achieve this.

We understand that the delivery of affordable housing will be considered as a public benefit by Officers which would, in any case, be weighed against its resulting carbon emissions as per Part A of the draft policy.

Circular Economy Statements

The WPA supports the use of Circular Economy Statements to encourage reuse and reclamation of existing building materials, both on and off site. The WPA acknowledges that further work should be undertaken, as appropriate, to identify opportunities for reuse and facilitate industry progress in respect of circular economy.

Future innovation

We support the City Council's intention to promote high-quality and sustainable buildings. However, we query the practicability of designing a building to be capable of adopting future technologies which are not yet defined and request that this is clarified.

Parts C&D – Unlocking Retrofit

The WPA supports the principle of this element of the policy but considers that it needs to be substantially strengthened if it is to create a genuine incentive for retrofit and influence decision making on individual applications, given the range of factors that can constrain the potential for extensions.

To give effect to this, the WPA suggests that reducing carbon emissions, and promoting the retention, re-use and retrofit of existing buildings, is specifically recognised as a public benefit and that policy state that it will be given weight when carrying out the heritage balancing exercise often required when evaluating proposals for extensions and alterations in a heritage context, frequently by paragraph 202 of the NPPF.

The policy should recognise that applications for retrofit that involve visual effects in townscape and heritage terms, and potentially in other areas, will be treated differently from new build development that would have had similar effects, to recognise the public benefit of reducing embodied carbon by retaining a building. This is important if this element of the policy is to successfully influence behaviour and development management outcomes.

Subjective language such as “responsible retrofit” should be removed, as the intention of this wording is unclear.

ENDS

Appendix A - DRAFT policy version 4 dated November 2023