

Central London
The Building Society
55 Whitfield Street
London W1T 4AH
+44 207 499 5888

Wimbledon
The Building Society
241 The Broadway
London SW19 1SD
+44 208 544 0033

Nottingham
St Mary's Hall
17 Barker Gate
Nottingham NG1 1JU
+44 1158 223 148

elliottwood.co.uk
thebuildingsociety.org

@elliottwood_partnership
@the_building_society

Date
25—04—2024

Subject
City Plan Partial
Review 2024 –
response to Regulation
19 consultation

City Planning Policy
Innovation and Change
Westminster City Council
17th Floor, 64 Victoria Street
London, SW1E 6QP

Proposed new Policy 43 Retrofit First

To whom it may concern,

I am writing, on behalf of Elliott Wood Partnership Ltd, to express our support for the proposed new Policy 43 Retrofit First, within the revised Westminster City Plan (Regulation 19 process).

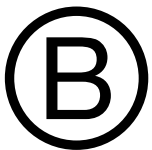
Elliott Wood is a purpose driven engineering consultancy, specialising in structural and civil engineering, sustainability consultancy, digital engineering and transport planning. We aim to inspire clients and organisations to think differently about their spaces – not just aesthetically and commercially – but for the benefit of the planet and people who use them every day.

We have worked on numerous projects within Westminster, including several major reuse schemes, such as the Ritz, Nomad London, King's College Quad Building, 55 Regents Street, and the Old War Office.

Whilst we also work on new build schemes, we fully support the principle and ambition of the new policy and believe it is critical that retrofit should be carefully considered at an early stage and that developers are encouraged to take a more detailed approach to justifying demolition within the borough.

On subsequent pages of this letter we have provided specific comments on each of the proposed policy sections.

Certified



Corporation

Elliott Wood Partnership Ltd.
Consulting Structural and
Civil Engineers. Elliott Wood
Partnership is a Limited
company registered in
England & Wales
no.09877061. Registered
office is 241 The Broadway,
Wimbledon, SW19 1SD.

PRIORITISING RETROFIT OVER DEMOLITION

Section A

Development should adopt a retrofit-first approach, where options for retrofitting and retention of existing buildings are considered before demolition. Where substantial or total demolition is proposed, this should be fully justified through an appraisal of the construction options, assessing the carbon cost and public benefits of refurbishment, retrofit, deep retrofit or newbuild options. Development involving total demolition of a building which has more than a single storey will generally be resisted, unless demonstrated through the appraisal that...

Point A1:

The proposed development will deliver public benefits which could not be delivered through a suitably comparable retrofit option; and...

- We would welcome more guidance on the definition of 'public benefits'.
- Whilst we recognise this is addressed in paragraph 43.4 we believe the policy would benefit from additional guidance on how this should be demonstrated within a planning application.

Point A2:

The whole-lifetime carbon of a new building would be less or similar to a suitably comparable retrofit option; or...

- In our experience it is not possible to justify demolition over new build purely based on whole lifecycle carbon; therefore, this point is redundant. Further clarification should be provided on the definition of 'suitably comparable'.
- This policy would benefit from a target to reuse a set percentage of demolition waste. In our experience a target of ~10% of demolition materials to be directly reused (on- or off-site) or shared via a second-hand salvage/reuse marketplace is a reasonable starting point (this could be increased over time).
- By introducing this requirement within the policy the Council will be increasing the supply of materials into the second-hand marketplace.
- Careful consideration should be given to how the Council will assess, verify and approve WLC calculations submitted at planning. The Council should publish detailed guidance (similar to that produced by the City of London) outlining how they would like whole life carbon calculations to be carried out. This should include set requirements for the assumptions that will be used within the calculations at planning stage (e.g., industry average carbon intensities for concrete and steel). This will allow WLCAs to be compared by the Council on a like-for-life basis.
- All projects must meet the targets set in the upcoming UKNZC Building Standard. If the project does not pursue a retrofit approach, and does not demonstrate a level of material reclamation, then the project's upfront carbon should meet aspirational requirements beyond NZCBS levels (e.g. 15% better). Offset payment benefits should only apply to further savings beyond this aspirational value.

Point A3:

The proposed development has bespoke operational requirements which could not be provided through the repurposing, adaptation and/or extension of the existing building(s); or...

- The Council should consider how this point will interact with existing policies. For example, *Policy 17 Supporting economic growth* supports knowledge and research-based sectors, which require lab-enabled spaces.
- The Council should be aware that it is extremely difficult to repurpose existing buildings for use as lab-enabled space. This is due to the specific requirements of this type of building use (e.g. vibration levels and floor-to-ceiling heights).

- As such, providing high quality lab enabled space within the Borough will almost certainly involve demolition.
- In certain instances this may be an acceptable justification for demolition. We are raising this point so that the Council are aware that it may be used within future planning applications.
- Please also consider our response to Point 4, below, regarding existing structural grids and floor-to-ceiling heights.

Point A4:

It is demonstrated that a retrofitting option is not possible or achievable due to structural constraints, demonstrated through an independently verified structural engineers report.

- Further clarification is required on the definition of 'independently verified structural engineers report'.
 - Would this require the appointment of a third-party engineer who has not been involved in the scheme design?
 - How should this appointment be made to ensure that independence is achieved?
 - Does the Council envisage this appointment will be made in a similar way to other independent reviews of planning applications (e.g. whole life carbon calculations)?
 - Will the Council expect applicants to arrange this third party review themselves or will this be commissioned by the Council?
- Further guidance should be provided on achieving BCO compliance within retrofit projects.
- From our experience column spacing and floor to ceiling heights are often cited as a key justification for demolition.
- We would welcome more definitive guidance on this from the Council (e.g. a formal statement from the Council confirming it is not necessary for refurbishments to achieve full BCO compliance and/or that failure to meet new build BCO standards is not a sufficient justification for demolition).

REDUCING EMBODIED CARBON EMISSIONS

Section B

All development involving total or substantial demolition of a building which has more than a single storey, and all major developments are required to...

- The wording of this section should be amended to make it clearer that point 1a does not apply to bespoke buildings (e.g. hotels).
- The current wording of this section does not make it clear that there is a choice between items 1a, 1b, 1c and 1d.
- Westminster should back the UKGBC's recent proposal that we need an accreditation for whole lifecycle carbon assessors to upskill the industry and improve consistency and accuracy of assessments.

Point B1(a-d):

Submit a Whole Life-Cycle Carbon assessment, which demonstrates how the development will achieve:

- For new non-residential buildings a target upfront embodied carbon equivalent of London Energy Transformation Initiative (LETI) band "A", with an absolute minimum rating of "B".*
- For new residential buildings, including mixed-use over 18 metres in height, a target upfront embodied carbon equivalent of LETI band "C", with an absolute minimum rating of "D". Where development is proposing the delivery of policy compliant levels of affordable housing (35% for private sector land, and 50% for public sector land), applicants should demonstrate the maximum embodied carbon reductions deliverable without affecting the viability of affordable housing delivery.*

- c) *For new residential buildings, including mixed-use below 18 metres in height, a target upfront embodied carbon equivalent of LETI band “B”, with an absolute minimum rating of “C”. Where development is proposing the delivery of policy compliant levels of affordable housing (35% for private sector land, and 50% for public sector land), applicants should demonstrate the maximum embodied carbon reductions deliverable without affecting the viability of affordable housing delivery.*
- d) *For developments involving the construction of bespoke buildings which do not have a recognised LETI benchmark, or self-build or custom-build homes, applicants should achieve the maximum reductions in upfront embodied carbon deliverable, and these should be fully justified...*

- We have found that recent changes to the calculation of whole lifecycle carbon (including the update to the RICS Professional Statement and the CWCT methodology for calculating the embodied carbon of façade systems) have resulted in a significant uplift in embodied carbon on most schemes.
- There is, therefore, a misalignment between the LETI targets (which were published in 2019/20) and the current calculation methodologies.
- Whilst we agree that the targets specified by LETI are required to meet the UK’s carbon reduction trajectory, in practice they are becoming difficult to achieve for the majority of developments. For example, utilising the CWCT methodology has resulted in a doubling of embodied carbon being reported for facades.
- Space, or flex, should be provided within the policy for alignment with future targets within the upcoming UK Net Zero Carbon Buildings Standard.
- Further information should be provided on point 1d, with regards to setting bespoke targets for typologies not covered by LETI.

Point B1(e):

- e) *In exceptional circumstances where there are site specific constraints which make the benchmarks undeliverable, any shortfall against the minimum embodied carbon targets will be offset through a financial contribution towards the council’s carbon offset fund.*

- We have received several comments from clients with regards to offset payments in general. We recommend the Council is more transparent with the use of funds raised by carbon offset payments as there is a perception that these are not being used effectively.
- Furthermore, we would like to see further clarification on developments that intend to procure certified 100% renewable energy. There is a general sense of unfairness with these schemes as they are often paying a premium to be zero carbon in operation but are also required to pay a substantial offset payment to the Council.
- We welcome and support the proposal to allow applicants to credit embodied carbon reductions below the minimum benchmarks to the total project carbon offset payment. However, this does require the embodied carbon assessments to be consistent across developments, and interrogated sufficiently to ensure this system is not open to abuse.

Point B2:

Where substantial or total demolition is proposed, applicants must:

- a) *Submit a Circular Economy Statement including a pre-redevelopment, and pre-demolition and reclamation audit which demonstrates how materials will be reused and repurposed; and*
- b) *Design any new structures to ensure the longevity of the building, easy adaptation, and with easily re-usable materials.*

- We welcome and support the requirement for consideration of circular economy principles.
- Further guidance should be provided by the Council on the role of the ‘pre-redevelopment audit’. We acknowledge that the GLA has provided some guidance on this but we feel this is by no means clear.

- Does the Council envision that the 'pre-redevelopment audit' will form the main document providing a justification for demolition?
- We support the requirement for a Circular Economy Statement for all larger projects (over 1,000 m²), irrespective of the level of demolition proposed.
- Many schemes that are classed as reuse will include substantial strip-out and demolition works. An example being retention of a building's structural frame but removal and replacement of internal walls and finishes, façade and MEP equipment.

UNLOCKING AND PROMOTING RETROFITTING

Section C

Proposals involving responsible retrofitting, which result in energy, performance, and climate adaptation upgrades, will be supported in principle.

- We welcome this and have no further comments on Section C.

Section D

When considering the townscape, heritage or design impacts of extensions or alterations, which are demonstrated through the appraisal of the construction options as necessary to viably achieve a wider retrofit of a building, regard will be had to the desirability of securing the retention and retrofit of the building, including improvements to its environmental performance, building longevity and climate change adaptation. Applicants should demonstrate in a Sustainable Design Statement or Retrofit Plan how technical risks have been addressed and how harm to heritage assets has been avoided or minimised.

- We welcome the requirement to provide further, detailed justification for design impacts of extensions or alterations, which are necessary to secure the viability of the retention and retrofit of buildings.
- The proposed policy would be strengthened by additional supplementary planning guidance on the proposed 'Sustainable Design Statement' and/or 'Retrofit Plan'.

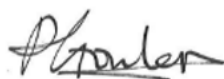
Yours faithfully,



Gary Elliott
Founder and CEO



Ben Holmes
Associate Director, Sustainability



Penny Gowler
Director and Head of Sustainability



Louisa Treadwell
Associate, Sustainability