

## Draft Policy v4: Retrofit first (November 2023):

### Prioritising retrofitting over demolition

- A. Development should adopt a retrofit-first approach, where options for retrofitting existing buildings are considered before total demolition. Where substantial or total demolition is proposed, this should be fully justified through an optioneering exercise, which assesses the carbon cost and public benefits of refurbishment, retrofit, deep retrofit or redevelopment options. Development involving total demolition and redevelopment will generally be resisted, except in the following exceptional circumstances:
1. It is demonstrated in an optioneering exercise that:
    - i. The proposed development will deliver significant public benefits which could not be delivered through a retrofitting option; or
    - ii. The whole-lifetime carbon of redevelopment would be less or similar to a retrofit option.
  2. The development has bespoke operational requirements which could not be provided through the repurposing, adaptation and/or extension of the existing building(s); or
  3. It is demonstrated that a retrofitting option is not possible or impractical due to structural constraints, demonstrated through a structural engineers report.
- B. All development involving total or substantial demolition, and all major development are required to:
- i. Submit a Whole Life-Cycle Carbon assessment, which demonstrates how the development will achieve either:
    - a. A target upfront embodied carbon equivalent of LETI band “B”, with an absolute minimum rating of “C”; or
    - b. A target life-cycle embodied carbon equivalent to RIBA 2030 Build Target band “A” or an absolute minimum rating of “B”.
    - c. For developments following the London Plan’s fast track route, the report should demonstrate the maximum embodied carbon reductions deliverable without affecting the delivery of affordable housing.
  - ii. Where substantial or total demolition has been agreed, applicants must:
    - a. Submit a Circular Economy Statement including a 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, easily re-usable materials, and capable of adopting new low carbon improvements.

**Unlocking and promoting retrofitting:**

- C. Proposals involving responsible retrofitting, which result in energy, performance, and climate adaptation upgrades, will be supported in principle.
- D. Proposals for extensions or alterations will be supported in principle, where they are integral to a wider programme of whole building retrofit, which is demonstrated will result in improvements in 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 harm to heritage assets has been minimised.

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