

By email only

Ms A Zimnicka  
Westminster City Council  
City Hall  
64 Victoria Street  
London  
SW1E 6QP

25 November 2024

Dear Agnieszka,

**RE: Westminster City Plan Partial Review Retrofit First (Policy 43) proposed modifications**

Thank you for your time and engagement on the modifications to the draft Partial Review of the City Plan as we work towards a Statement of Common Ground. I am grateful to you and your team for the constructive discussions that you have facilitated over the summer with a range of stakeholders, including WPA.

Since the publication of your proposed changes to the Partial Review we have spoken at length with a wide variety of industry and technical specialists across our membership and in the spirit of our engagement so far and the strong interest on the topic from our members, we felt it essential to provide you with an overview of initial feedback on the proposed 'Retrofit First' Policy 43.

This is a crucial issue for Westminster; whilst environmental considerations are important, social and economic benefits of development must also be considered if we are to deliver sustainable development, as set out in the National Planning Policy Framework (NPPF). It is also vital that emerging policy recognises that Westminster is an exceptionally sustainable location for low carbon growth, with high productivity supported by unparalleled transport connectivity. Westminster must continue to play its unique role in meeting London's, and the UK's, objectives for sustainable growth.

In our initial response, the proposed embodied carbon levels were a key area of concern, so we therefore welcome the work carried out on the policy since the Regulation 19 consultation and support the updated embodied carbon targets. These new levels, rightly, remain stretching. They will not be achievable in all cases but we support the City Council's ambitions to ensure development is contributing to both the economy and its communities, whilst being as low carbon as possible – from both an embodied and operational perspective. We also welcome the clarity that has been brought to policy wording, and look forward to discussing areas of detail and implementation with you, once we have reviewed the evidence base and guidance.

However, concerns remain on other aspects of the wider policy, notably the sequential test. In a market as complex, large and diverse as Westminster's there will be some buildings that cannot be effectively retrofitted or repurposed in a way that is deliverable and economically rational. This test does not provide certainty to investors as to when the replacement of a building will, or will not, be acceptable. As a result, it risks becoming a major disincentive to much needed inward investment to decarbonise obsolete buildings and modernise the built environment.

We hope to continue our dialogue as we move towards completing a Statement of Common Ground in advance of the Examination in Public and should you have any queries regarding the content of this letter, please do contact me.

Yours sincerely



**Charles Begley**  
Chief Executive  
Westminster Property Association