

Appendix 8 - Policy X E - Reducing Carbon Emissions in Existing Buildings

- 1.1. Given that a third of the district's emissions arise from existing buildings, the decarbonisation of existing buildings is crucially important to the council. Whilst local planning policy has only a limited influence on the carbon and energy performance of existing buildings (as policy can only seek changes to buildings where the building owner is seeking to require a change to the building that requires planning permission), the retrofit of existing buildings can be pursued through providing a permissive and supportive policy approach to energy efficiency and carbon improvements to existing buildings.

Policy X E - Reducing Carbon Emissions in Existing Buildings

- 1) Development which would result in considerable improvements to the energy efficiency, carbon emissions and the general suitability and longevity of an existing building will generally be supported, with significant weight attributed to those benefits.

E1 - Prioritise Retrofit- First Principles

- 2) Development should adopt a retrofit-first approach, where options for retrofitting and retention of existing buildings are considered before demolition.
- 3) Development involving existing buildings should demonstrate that a whole building approach and the following hierarchy has been considered:
- a. Refurbishment and upgrading of existing building fabric including wall, roof and floor insulation, windows, doors and thermal bridging
 - b. Installation of low or zero-carbon heating and hot water systems, and the installation of renewable energy generation on-site
 - c. Connection to an existing or planned low carbon heat network
- 4) Where substantial or total demolition is proposed, a feasibility assessment should be submitted. The feasibility assessment should demonstrate:
- a. The whole life carbon of a new building(s) would be less or similar to a suitably comparable retrofit option (as detailed in 3 a-c above)
 - b. The proposed development would deliver public benefits which would not be delivered by a suitably comparable retrofit option
 - c. The feasible reasons retrofit cannot be considered, including operational or structural requirements
- 5) Demolition of existing buildings will only be permitted where applicants can demonstrate that alternative development options have been comprehensively explored and following assessment by the Local Planning Authority, on balance, the whole life carbon of a new building(s) would be less or similar to a suitably comparable retrofit option, the proposed demolition of an existing building(s) secures benefits over and above retention, refurbishing and retrofitting an existing building(s) or is not feasible as set out in the feasibility assessment.

E2 - Embodied Carbon

- 6) For major developments involving substantial or total demolition of an existing building(s), applicants should submit a Whole Life Carbon Assessment in accordance with Policy D1.

E3 - Adapting Heritage Assets to Climate Change

- 7) Development which would result in considerable improvements to the energy efficiency, carbon emissions, resilience and longevity of designated (including within Conservation Areas) or non-designated heritage assets will be supported, providing that the significance of the asset is preserved.
- 8) A whole-building approach should guide interventions to upgrade historic buildings, and direct interventions, where they limit the impact to the significance of the historic buildings or their setting.
- 9) The sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in designated and non-designated heritage assets will be encouraged, providing that the significance, character and appearance of the asset is preserved in a manner appropriate for their significance.

Reasoned Justification

- 1.2. The Climate Change Committee (an independent, statutory body in the UK that advises the government on climate change targets and progress in reducing emissions) has shown that in order for the UK to meet its legally binding carbon reduction goals, it is vital that the existing building stock must be decarbonised. Therefore, Local Plan policy which supports improving the efficiency of existing buildings, reducing the energy demand and carbon emissions of existing buildings aligns with local and national carbon targets (including the UK's legally mandated Carbon Budget).
- 1.3. The NPPF sets out that local planning authorities should give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic. It further sets out that where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in the chapter of the framework relevant to conserving and enhancing the historic environment.
- 1.4. The hierarchical approach to retrofitting prioritises fabric upgrades and energy efficiency improvements before incorporating low- or zero-carbon heating, hot water systems, and renewable energy generation, aligns with Policy XA, offering potential benefits including reduced energy bills and longevity of buildings. This policy also closely correlates to Policy XD with regards to reducing embodied carbon and promoting circular economy principles.
- 1.5. This policy aims to ensure that retrofitting of historic buildings and heritage assets are undertaken in a sensitive manner, balancing the important notions of conserving and enhancing the historic environment and decarbonising existing buildings, leading to a more sustainable and resilient historic built environment.
- 1.6. Compliance with E1 should be demonstrated within the energy statement. It is accepted that the level of detail provided may be lower for householder and minor applications. However, where substantial or total demolition is proposed, applicants would still be expected to assess the embodied carbon of alternatives to demonstrate why this level of demolition would be

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acceptable. It is recommended that applicants engage with the council early in the development process regarding feasibility assessments and alternative options. Additionally, with regards to applicants demonstrating that a whole building approach are recommended to utilise a nationally recommended recognised assurance scheme such as BSI PAS 2035. **The demolition (to enable replacement infrastructure), or upgrades of essential infrastructure such as water and wastewater works would generally not be obligated to fulfil the requirements of E1 as it's acknowledged that replacement and upgrades to essential infrastructure is often driven by compliance, safety, or resilience needs.**

- 1.7. If applicable, output reports for E2 should be submitted alongside an energy statement.
- 1.8. To support applicants in retrofitting existing buildings, various guidance is available including: [LETI Climate Emergency Retrofit Guide \(LETI, 2021\)](#), [Net Zero Carbon Toolkit \(Etude, Elementa, Passivhaus, Levitt Bernstein, 2021\)](#), and [Passivhaus Trust's Retrofit Primer \(2022\)](#).
- 1.9. In respect of historic buildings and heritage assets, guidance is available at [Historic England's Energy Efficiency and Retrofit Guidance](#).