



Above: The CBA continually reviews applications to demolish locally valued buildings to facilitate new construction

Catherine Bell, listed building caseworker at the Council for British Archaeology, presents an example from the council's files

## 74. The planning system

Are the winds of change blowing in the planning system, towards adapting old buildings instead of demolishing them?

Previous Casefiles articles have highlighted the potential of unlisted old buildings in contributing to net zero carbon targets alongside a local sense of place. Valued historic buildings that have evolved and changed often do not meet designation criteria, but can still be local landmarks and cornerstones in the identity of places for local communities.

This is intuitive if you think about big local employment sites or entertainment venues that have changed use a lot over the years.

It is not unusual for unsympathetic alterations to have taken place to sites through changes of use or adaptation to new functional systems, in the twentieth century especially. This is particularly common in parts of the country where tight budgets mean quality of design and materials is given lower priority.

Successful heritage-led regeneration projects, including Heritage Action Zones around the country, have injected money into bringing vitality back into bedraggled places, reversing such unsympathetic changes, as a means of regenerating areas and restoring pride in places. Heritage-led regeneration is tried and tested. It benefits places, people, and also the environment.

As well as their contribution to the character and identity of places, there are climate driven imperatives that make adapting and reusing existing buildings preferable to demolishing them. The UK is committed to becoming carbon neutral by 2050.

In 2019 research identified the construction of new buildings as emitting 48 mega-tonnes of carbon dioxide (CO<sub>2</sub>) in the UK each year (UKGBC, CCC), meaning the Construction Sector required seismic change to meet 2050 targets. In its 2023 *Progress Report to Parliament*, the UK government's independent advisory body, the Climate Change Committee (CCC) found that, "overall, the indicators and emissions trends for the buildings sector are not on track to meet the Government's targets."

The CBA is not alone in believing our approach to old buildings may be key to



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radically reducing the carbon emissions from the built environment. Old buildings contain vast quantities of embodied carbon in their materials, supporting the truism that 'the greenest building is the one that already exists'. Embodied carbon is overlooked in current regulations as a component of a building's energy efficiency; current regulations only measure the carbon emissions of buildings based on operational energy use. The CBA has long advocated through its casework for a 'whole building' approach to calculating carbon and for applying this to viability assessments around demolition/reuse of structures. We need to consider the embodied carbon in buildings as well as the financial viability of different options for redevelopment.

Carrig Conservation International's research for Historic England's *Understanding Carbon in the Historic Environment* identified this fundamental flaw in how the carbon usage of buildings is calculated as misrepresenting the total carbon emissions of demolition and new-build by nearly 30%, as opposed to retrofitting a standing structure for improved efficiency in daily energy usage. This omission creates the false impression that new construction, as opposed to retrofitting an old building, is a more environmentally sustainable option in terms of emissions savings.

Both the Carrig research and the CCC recommended in 2019 that revisions to policies and regulations were necessary to drive the scale of potential carbon savings from refurbishing existing buildings for improved energy efficiency, and to stem

the wastage of embodied carbon in the built environment. Sluggish progress against this recommendation is frustrating. The CBA continually reviews applications to demolish locally valued buildings to facilitate new construction.

Still, in 2023, one of the key messages in the CCC's progress report is that, "Planning policy needs radical reform to support Net Zero. [...] The planning system must have an overarching requirement that all planning decisions must be taken giving full regard to the imperative of Net Zero." The same report identified a continued, "overly narrow approach to solutions, which crucially does not embrace the need to reduce demand for high-carbon activities".

Repurposing standing buildings to deliver much-needed housing, and to minimise the wastage of embodied carbon appears obvious in this context, especially alongside the benefits of reinvigorating an existing 'sense of place'. So why is it not more widely adopted? Ironically, the acute need to substantially step up action to cut emissions from buildings is undermined by the VAT system, which effectively incentivises site clearance and new development. The UK's VAT system imposes a 20% tax rate on repair, maintenance, and refurbishment of existing buildings, while new-build developments are VAT-free.

Regulations state that for a development to qualify for zero rating, "any pre-existing building must have been demolished completely, all the way down to ground level" (HMRC, 2019). For developers, this makes retrofitting



existing buildings considerably less financially attractive. Alongside its advocacy partners, the CBA continues to champion reforms to this inequity in VAT to government at every opportunity.

Despite an absence in government leadership on establishing a 'retro-first' approach, the issue has been brought to public attention by the campaign, led by SAVE Britain's Heritage, against M&S's application to demolish and rebuild its flagship Oxford Street store. Despite the SoS overturning Westminster Council's initial approval, the application has subsequently been passed at appeal.

The grounds for appeal rest on the application of planning policy, which currently do not support consideration of the embodied carbon that would be wasted. This is particularly frustrating in light of the failure to implement the CCC's 2022 recommendation to government that, "The whole-life carbon assessment should be sought at the planning stage to enable efforts to reduce embodied carbon and materials."

The high-profile debate around preferential adaptive reuse over demolition has been a positive outcome from the M&S case. Widely supported persuasive arguments have been made for a reformed 'retro first' approach to the built environment and 'whole life' carbon assessments accompanying viability assessments for site options appraisals.

The C20th Society hit the nail on the head in identifying M&S, in the company's continued pursuit to demolish this handsomely detailed early twentieth century prominent corner plot, as 'failing to read the room'.

Regardless of the lack of resolution to the M&S application, there is a clear move towards a reformed approach to reusing and retrofitting existing buildings appearing in planning policies. The City of Westminster and the City of London are both consulting on supplementary planning guidance to their Local Plans that would prioritise the retrofit and refurbishment of existing buildings to meet future needs over unnecessary demolition and redevelopment. Ironically, this looks like the policy Westminster needed to refuse the M&S



*Left: Repurposing standing buildings to deliver much-needed housing and to minimise the wastage of embodied carbon appears obvious*

application originally.

Despite an absence of government leadership in policies encompassing 'whole life' carbon assessments and incentivising adaptive reuse, a critical mass of organisations are now forming around retrofit strategies, including heritage and environmental, alongside architects, engineers, surveyors, and builders.

Bodies like National Retrofit Hub, UK Net Zero Carbon Buildings Standard, the Sustainable Traditional Buildings Alliance, and Historic England are developing a knowledge base, including case studies and advice around best practice when it comes to retrofitting buildings for energy efficiency, and when adapting sites for a new use.

The tipping point for implementation still requires national government policy; to support its delivery will require VAT reform. To these ends, an exciting new campaign group #don'twastebuildings recently published a range of potential financial incentives geared towards the reuse of existing buildings, and reducing the waste of embodied carbon.

'How is this connected to archaeology?' you are asking. The answer is in the future management of sites like the Corah factory in Leicester (see Casfiles, Issue 186, Sep/Oct 2022). The St Margaret's Works, constructed as a Palace of Industry, evidences the textile manufacturing that nineteenth century Leicester was built on. These buildings could be sustainably adapted, embracing the city's past, to deliver new housing. Or largely demolished, as proposed by a live application for the site. Planners can only

make decisions against legislation, and national and local policy.

Adaptation and reuse characterises the historic grain of the built environment, developing a legible incremental evolution in places' local identity. Substantial overhaul in the built environment was rare before the twentieth century. A retro-first approach is the continuation of a time-honoured tradition. Buildings that evolve in phases tell us about the people who made and used them. They provide insights to shifts in the cultural, social and economic backdrop of different periods.

What does contemporary construction say about our current era? Arguably, the most important legacy we will leave is in our response to the knowledge of our impact on the planet. How we respond to climate change is what future generations will rightly judge us on. Unlisted buildings, especially, offer opportunities for creative architectural responses to the situation we now find ourselves in. We have got to stop wasting them. ■

