

Response to Mayor of London Consultation: Draft London Plan Consultation 2026

Consultation	Draft London Plan Consultation 2026
Responding organisation	The Engineers Reuse Collective (tERC)
Response type	Organisational response
Date	15 th October 2026

1. Introduction and Summary

The Engineers Reuse Collective (tERC) is a UK not-for-profit group of engineering consultancies and associated professionals championing, accelerating and delivering reuse in the built environment to support the transition of the UK's built environment to Net Zero Carbon. Our mission is to dramatically increase reuse within the built environment, with minimal reprocessing, to support the transition to circular economy principles and to urgently reduce the carbon intensity of the built environment.

This document provides our response to the draft London Plan consultation 2026 regarding the following policies:

- GLE11: Circular economy
- GLE12: Waste
- GHR3: Whole life-cycle carbon
- MBUL7: London's heritage
- HN2: Protecting and reshaping housing

We welcome the Mayor's decision to retain and strengthen circular economy policy in the draft London Plan, and recognise that this draft goes further than the 2021 Plan in requiring Circular Economy Statements, setting waste diversion targets, and linking retention of existing buildings to embodied carbon reduction. This represents genuine progress.

However, we do not believe the draft Plan is ambitious enough to deliver the scale and pace of change needed to shift London's built environment from a linear to a circular model within the timeframe the climate emergency demands. Our central observation is one of internal coherence rather than of disagreement with the Mayor's direction. The Plan's reasoned justification already states the right principle. Paragraph 5.30 says that retaining existing built structures for reuse and retrofit '*should be prioritised before considering substantial demolition, as this is typically the lowest-carbon option*', and paragraph 4.95 says that '*strategies which prioritise retention of existing structures should be robustly considered*'. What the policies then do is narrower than what the justification promises. The requirements that matter most apply to a small subset of referable schemes, retention is framed as an assessment rather than a sequence with an outcome, the most ambitious carbon figures are aspirational rather than mandatory, the reuse hubs on which construction product reuse depends are supported if proposed but never planned for, and the Plan's monitoring framework does not track circular economy delivery at all.

Critically, this gap is not a matter of what is achievable. Westminster City Council has already adopted and is operating a materially stronger set of requirements under its Policy 43 (Retrofit First), found sound at independent examination, with published evidence of delivery. Nor is this a single-borough outlier: the City of London

Corporation is moving in the same direction, with its own retrofit-first approach already shaping outcomes and a statutory retrofit-first design policy currently in examination. Our position is therefore that the Plan should as a minimum adopt requirements equivalent to those already in force in Westminster, and should ideally go further and faster, given the Plan's London-wide reach and the pace the Mayor's own stated climate position demands.

The publication of a new National Planning Policy Framework on 17 August 2026 changes the context in two ways that both point in the same direction. National decision-making policy now expects all development proposals, at every scale, to take opportunities to reuse existing structures and materials, and directs substantial weight to the benefits of improving existing buildings. At the same time, plan-making policy PM13(2)(b) allows development plans to set quantitative standards on other matters not addressed by Building Regulations, which opens the way for a local embodied carbon standard, where these have a clear and robustly costed rationale, are proportionate and will not harm viability or deliverability. This matters particularly because the Plan states at paragraph 1.1 that it was prepared having taken into account the draft NPPF published in December 2025, and explains at paragraphs 5.10, 5.19 and 5.20 that it moderated its own ambition in deference to that draft's standardising intent. The final Framework departed from the draft on that point: it no longer restricts local standards on matters such as embodied carbon. The Mayor therefore has both a national policy expectation to meet and an express national policy route to meet it, and the stated reason for the Plan's restraint has been removed.

The Plan's own Integrated Impact Assessment (IIA) reinforces the case. It records that London is not currently meeting the Mayor's target of net zero by 2030, and assesses the Plan as a whole as having only mixed minor positive and minor negative effects on climate change. It identifies no reasonable alternatives for GLE11, GHR3, MBUL7 or HN2, although it appraised alternatives for sixteen other policies, including a more ambitious alternative for GHR1. It attributes significant positive effects to GLE11 and GHR3 without accounting for their confinement to referable schemes or for paragraph 5.31, and it proposes no indicator to monitor those effects. It identifies embodied carbon effects from tall buildings and from redevelopment in the Central Activities Zone, but recommends no mitigation for either.

We ask the Mayor to use this consultation to close that gap between ambition and mechanism, in line with our specific policy comments made above.

2. GLE11: Circular economy

What the policy does now

GLE11 asks all development to '*promote circular economy outcomes*' (Part A). But its main tool, the Circular Economy Statement, is only required for referable applications (Part B and paragraph 4.92). Everything else only has to '*demonstrate some consideration*' of circular economy aims (paragraph 4.91). The waste targets in Table 4.2 are used as benchmarks for all schemes, but only the largest have to commit to meeting them (paragraphs 4.90 and 4.91).

The problem

- **Most building work is not covered.** The large majority of London's development falls below the referable threshold. For those schemes, the Plan sets targets but gives no way to show they have been met and no common standard boroughs can test them against.
- **Boroughs are filling the gap in different ways.** Westminster has its own rules and the City of London is developing its own. The same scheme can face different requirements depending on which side of a boundary it sits.
- **Low-value recycling counts the same as reuse.** The 95 per cent targets for demolition and construction waste can be met by crushing concrete into hardcore. That counts the same as taking out a steel beam and using it again, although it keeps far less value.
- **One target uses an undefined term.** Excavation waste has a target of 95 per cent '*beneficial reuse*', but the Plan does not say what that means, or whether simply backfilling holes counts.
- **Reclaimed materials have nowhere to go.** Reusing building products at scale needs reuse hubs, where materials can be checked, stored, repaired and sold on. London has very little of this capacity. GLE11 only says such facilities '*should be supported*' if someone proposes them, including as a temporary '*meanwhile use*' (Part C). It does not plan for them, find sites for them or define them. Without them, materials saved in a pre-demolition audit still end up in a skip.
- **Nothing measures whether the policy works.** None of the 16 indicators in Annex A tracks reuse or the circular economy.

What we are asking for

1. **As a minimum, adopt policy equivalent in substance to Westminster's Retrofit First policy (Policy 43),** including its sequential test for substantial demolition. Where a scheme involves substantial demolition, as Westminster defines it, require a Circular Economy Statement, pre-redevelopment audit and whole life carbon assessment.
2. **Preferably, go further.** Also require a Circular Economy Statement, pre-redevelopment audit where there are existing buildings, and whole life carbon assessment for all major development and any scheme over 1,000m², so that large new buildings on cleared sites are covered too.

3. **Make it proportionate.** Publish a simple template version of the Circular Economy Statement and audit for schemes below the referable threshold, so smaller applicants are not asked to produce documents designed for the largest schemes.
4. **Set a separate target for direct reuse,** meaning components used again in their existing form rather than crushed or melted down.
5. **Define 'beneficial reuse'** for excavation waste, and say whether backfilling counts.
6. **Require material passports** (records of what a building is made of, to help future reuse) for referable schemes from adoption, extending to all major schemes within five years.
7. **Publish the cost evidence.** Commission and publish a costed assessment of these thresholds, as national policy now requires for local standards, drawing on the evidence Westminster has already had tested.
8. **Plan for reuse hubs.** Local plans should identify and protect sites for reuse hubs across London, so that every area has one within reach of where demolition happens. Priority should go to industrial land, sites near wharves and railheads, and land the GLA group owns.
9. **Give reuse hubs a future beyond temporary use.** Hubs need secure sites to justify investing in equipment, testing and staff. Temporary use should be a step towards a permanent site, not the whole answer. The Mayor should secure a permanent home for Tipping Point East, or an equivalent, after its five years are up.
10. **Define 'circular economy infrastructure'** in the glossary so that it clearly includes reuse hubs for construction products.
11. **Make Circular Economy Statements show where reusable materials will go,** including to reuse hubs, before anything is treated as waste, and allow time in demolition programmes for careful removal.
12. **Measure it.** Add indicators to Annex A for:
 - a) how much material is reused, as opposed to recycled or recovered, on referable and major schemes, broken down by type; and
 - b) the number, capacity and throughput of reuse hubs in London.

Why we think this is right

- **It works in London.** Westminster's Policy 43 was found sound at examination in spring 2025. Westminster reports that across 19 schemes in the first half of 2025, covering over 143,000m² of new and refurbished floorspace, construction carbon fell by about 24 per cent. The City of London has adopted similar guidance and has a retrofit-first policy in its emerging City Plan 2040, which is not yet adopted.
- **Other cities and countries do it.** Several are fellow members of C40 Cities, the climate network London co-founded and the Mayor co-chairs. A city in that position should be setting the standard, not trailing it. Copenhagen and Toronto have strong and effective policies on reuse and waste diversion. France requires a pre-demolition survey for demolition or major renovation above about 1,000m².
- **National policy now expects it at every scale.** The new NPPF says development should take opportunities to reuse existing structures and materials (policy CC2(1)(d)). It has no size threshold. GLE11 gives most schemes no way to show they have done this. The Plan itself says GLE11 exists to fill the gap that national policy leaves (paragraph 4.97).

- **National policy now allows it.** NPPF policy PM13(2)(b) lets local plans set their own standards on other matters that Building Regulations do not cover, which would include embodied carbon, as long as they are robustly costed, proportionate and do not harm viability. The Government had consulted on restricting this, then changed course after most respondents objected.
- **The Plan already accepts smaller-scale checks.** Policy HN2 already requires an assessment of alternatives before affordable homes are demolished, at any scale.
- **The GLA's own assessment agrees.** The IIA says the London Plan '*should apply principles of circular economy ... in all construction and operational practices*' (paragraph C.155).
- **It need not add cost.** The Plan itself says keeping existing structures '*reduces construction costs and can reduce the overall timescale for the development process*' (paragraph 5.30).
- **Reuse hubs work, and London has started.** Tipping Point East opened in spring 2026 in the Royal Docks, Newham, on a site owned by the GLA. It is run by Yes Make, Resolve Collective and Material Cultures. It takes in reclaimed construction materials, checks and records them, stores and refurbishes them, and supplies them to new projects, with the aim of diverting useful material from landfill. It also has training space, a community workshop and a public membership scheme. But its operators have the site for five years only. London's leading reuse hub is itself a temporary use, which is all the Plan currently supports.
- **Scotland is leading the way.** Zero Waste Scotland is planning reuse hubs deliberately, not waiting for them to be proposed. It published a study of regional reuse hubs in 2024, and since 2025 has been developing a model for a Circular Construction Hub that is ready for investment by the end of 2027. Scotland's route map to 2030 makes reusing construction materials a priority.
- **Reuse hubs create jobs and community value.** Careful dismantling, checking, repair and resale take skilled people in a way that crushing and landfill do not. The Plan recognises '*acute workforce shortages across the construction and built environment industries*' (paragraph 4.6), and the IIA says circular economy facilities '*could support the creation of jobs*' (paragraph 6.231).
- **The Plan's own evidence shows the gap.** The IIA counts about 200 sites in London handling construction waste, measured by the recycled aggregate they produce (paragraph D.247). It records no reuse capacity at all.
- **You cannot manage what you do not measure.** The Plan already measures how much energy data centres reuse (indicator 12), so a reuse indicator would be no harder. National policy expects the Mayor to monitor the Plan and to start an early review if it becomes substantially inconsistent with national policy (NPPF policy PM1(2)(i)). With national policy now expecting reuse at every scale, that cannot be judged without data. And the law requires the significant effects the IIA expects from GLE11 to be monitored (IIA paragraph 8.1).

Is it sound?

- **Positively prepared: Yes.**
- **Justified: No.** The IIA considered no alternatives to GLE11 (paragraph 6.234), even though Westminster's tested approach was an obvious one. No evidence explains why the referable threshold is the right one for London.
- **Effective: No.** The targets apply to everyone, but only the largest schemes have a way to meet them. Key terms are undefined, so compliance cannot be judged. Nothing in the Plan's monitoring measures

whether the policy is working. The Plan makes no plans for the reuse hubs that any reuse target depends on. And leaving smaller schemes, and reuse hubs, to each borough is producing a patchwork rather than joint working.

- **Consistent with national policy: No.** National policy expects reuse to be considered at every scale. GLE11's tools only reach the largest schemes.

3. GLE12: Waste

What the policy does now

GLE12 protects waste sites and plans for enough waste capacity. Where a waste site is lost, replacement capacity should be '*at the same level or higher of the waste hierarchy*' (Parts D(2) and E(2), and paragraph 4.106). New waste sites should help '*move waste up the waste hierarchy*' (Part F(1)).

The problem

- **The waste hierarchy is never defined.** The Plan relies on it in GLE11 and GLE12 but does not say what it is. The glossary defines terms such as '*upfront embodied carbon*', but nothing for '*waste hierarchy*' or '*recovery*'. Without a definition, nobody can judge whether a replacement site really is '*at the same level or higher*'.
- **'Recovery' covers very different things.** Backfilling holes with inert waste saves some new material. Burning waste for energy destroys the material completely. The Plan's 95 per cent targets treat both as equal to reuse and recycling.
- **The GLA's own assessment shows the risk.** The IIA describes the hierarchy in different words from the law (paragraph C.155), which shows how easily the terms can drift.
- **Reuse is named as a priority but not planned for.** In practice, the policy treats capacity for construction waste as crushing and processing sites. Reuse hubs, which keep materials at their highest value, are not counted as capacity, protected like waste sites, or planned for. The IIA counts about 200 sites in London handling construction waste, measured by the recycled aggregate they produce (paragraph D.247).
- **Nothing measures where construction waste ends up.** None of the 16 indicators in Annex A covers waste; waste self-sufficiency is mentioned only as wider context for the Annual Monitoring Report. The IIA suggests tracking waste self-sufficiency, but that says nothing about whether waste is reused, recycled or burned.

What we are asking for

1. **Define '*waste hierarchy*'** in the glossary using the legal hierarchy in the Waste (England and Wales) Regulations 2011: prevention, preparing for reuse, recycling, other recovery (such as energy recovery), and disposal, in that order.
2. **Define '*recovery*'** and make clear it ranks below reuse and recycling.
3. **Explain the main types of recovery** for construction waste, at least backfilling and energy recovery, and say they are lower value than reuse and recycling.
4. **Report results by type.** Circular Economy Statements and post-completion reports should show reuse, recycling, backfilling and energy recovery separately, rather than one combined figure. A scheme that hits 95 per cent mainly by burning or backfilling should look different from one that hits it mainly through reuse.
5. **Count reuse hubs as waste capacity.** Treat reuse hubs for construction products as strategically important capacity for construction waste under Part B(2), and as the preferred way to move that waste up the hierarchy under Part F(1).

6. **Find sites for them.** When boroughs look for waste sites under Part C, they should look for sites suitable for reuse hubs too, including industrial land and sites near wharves and railheads, and allow hubs alongside other recycling facilities (Part F(2)).
7. **Protect them.** Once open, reuse hubs should be protected like waste sites (Part E), so they cannot be lost to redevelopment without replacement capacity.
8. **Plan them across borough boundaries,** so that hubs are where demolition happens.
9. **Measure it.** Report every year, alongside waste self-sufficiency, how London's construction waste is managed by type, using the Circular Economy Statement data, and the number, capacity and throughput of reuse hubs.

Why we think this is right

- Decisions under GLE12 often involve other boroughs, through offers of capacity across boundaries and the proximity principle, so a test that cannot be applied consistently undermines joint working.
- The IIA notes that Environment Agency data '*does not capture all CD&E processing activities*' (paragraph D.247). Better reporting through Circular Economy Statements would fill a gap that existing data cannot.
- Reuse hubs are the clearest way to move construction waste up the hierarchy. Tipping Point East, on a GLA-owned site in the Royal Docks, aims to divert useful material from landfill, but has its site for five years only. Scotland is going further: Zero Waste Scotland is planning reuse hubs deliberately and developing a Circular Construction Hub model that is ready for investment by the end of 2027.
- Hubs serve areas wider than one borough. The IIA notes that '*waste flows across boundaries*' (paragraph D.239), so reuse hubs are a natural subject for the cross-boundary planning GLE12 already encourages.

Is it sound?

- **Positively prepared: Yes.**
- **Justified: Yes.** The evidence on waste apportionment is adequate. The IIA considered no alternatives (paragraph 6.239), but our objection does not depend on that.
- **Effective: No.** Reuse is named as a priority in Part A, but nothing in the rest of the policy plans for reuse capacity, and nothing measures where London's construction waste ends up. Separately, the policy's key test depends on a term the Plan never defines, which is easily fixed with a glossary entry.
- **Consistent with national policy: Yes.**

4. GHR3: Whole life-cycle carbon

What the policy does now

- **Part A:** referable schemes on sites with existing buildings should assess whether those buildings could be kept, and submit a pre-redevelopment audit.
- **Part B:** all new buildings should show that upfront embodied carbon has been considered and reduced where possible.
- **Part C:** sets upfront embodied carbon limits. Only the '*baseline*' figure is binding. The '*aspirational*' figure is not.
- **Part D:** development should keep whole life carbon down and report it.

The supporting text says keeping existing buildings '*should be prioritised before considering substantial demolition*' (paragraph 5.30). The next paragraph says this must be weighed against making the most of site capacity (policy MBUL2) and delivering commercial space in the Central Activities Zone (policy PV2), and '*should not be used as a means of blocking appropriate redevelopment*' (paragraph 5.31).

The problem

- **It is a duty to 'assess', not a duty to 'do'.** Part A asks schemes to assess retention, but nothing is impacted by the answer. Paragraph 5.31 then tells decision-makers that the assessment should not stop redevelopment.
- **Central London is effectively exempt.** Paragraph 5.31 gives way to new commercial space in the Central Activities Zone, which is where most commercial demolition happens. The IIA itself says redevelopment there '*may result in more embodied carbon emissions compared to refurbishment*' (paragraph 6.350, in its appraisal of policy PV2).
- **The policy contradicts itself on who it covers.** Its '*Applies to*' line says it covers referable applications only. But Parts B, C and D refer to '*all new buildings*' and '*development*'.
- **The higher targets never become binding, and there is no trajectory.** There is no date for the aspirational figures to become the requirement. There is no trajectory for tightening the requirements towards the UK's legally binding 2050 net zero target, let alone the Mayor's far more ambitious 2030 target.
- **The binding limits are weaker than the industry's own voluntary benchmark.** There is currently no national limit on embodied carbon. To fill that gap, the construction industry wrote the UK Net Zero Carbon Buildings Standard (UKNZCBS). Whilst it is voluntary, its purpose is to show what a national standard should require, with limits that fall year by year towards 2050 in line with the UK's carbon budgets.
- **There is no control over how options are compared.** A retention option can be made to look worse by assuming, without evidence, that the existing building will use more energy than a new one.

What we are asking for

1. **Replace 'assess' with a sequential test**, adapted from Westminster's. Demolition should only be supported once a retention option has been shown not to work, through three checks in order:
 - c) an independently checked structural engineer's report on whether the building can be kept;

- d) an assessment of whether the existing building can meet the needs of the proposed use;
 - e) a whole life carbon comparison of the workable retention options against the proposed scheme.
2. **Delete or rewrite paragraph 5.31.** If an exception is kept, it should be a defined exception that has to be justified, not a general instruction that any applicant can rely on.
 3. **Use the same trigger as GLE11**, so the two policies cover the same schemes. They already refer to each other, and changing one without the other would leave gaps.
 4. **Settle who the policy covers**, and apply Parts B, C and D to at least all major development.
 5. **Turn the aspirational targets into binding ones** on a set date, with limits that then keep falling on a published timetable, as the UKNZCBS already does.
 6. **Require like-for-like energy assumptions** when comparing retention with new build, unless energy modelling shows otherwise.
 7. **Publish the cost evidence** for these limits, as national policy now requires.
 8. **Update the explanation in paragraphs 5.10, 5.19 and 5.20** to refer to the final NPPF rather than the December 2025 draft.
 9. **State the Mayor's net zero target and the trajectory to reach it in the Plan**, and explain how these policies contribute to it..
 10. **Measure it.** Add an indicator to Annex A for average upfront embodied carbon per m² on referable and major schemes, reported separately for each of the Part C limits, and record how often a retention option was assessed and why it was turned down. Publish both every year.

Why we think this is right

- **National policy gives real weight to existing buildings.** The new NPPF says '*substantial weight*' should be given to the benefits of improving the energy efficiency and climate resilience of existing buildings (policies CC2(2) and CC3(2)). Paragraph 5.31 tells decision-makers to set aside the analysis that would identify those benefits.
- **National policy now leans strongly towards approval.** The new NPPF says development within settlements, which covers almost all of London, should be approved unless the harm '*substantially*' outweighs the benefits (policy S4(1)). Against that, a duty to '*consider*' retention, with no defined outcome, carries very little weight. A clear test with a clear outcome is needed.
- **The Plan's reason for holding back has gone.** The Plan says it sets standards beyond Building Regulations because falling back to national standards would undermine net zero and '*the fulfilment of [the Mayor's] legal duties*' (paragraph 5.19). It also says it tried to align with the draft NPPF, which aimed to standardise requirements nationally (paragraphs 5.19 and 5.20). The final NPPF reversed that draft. It now expressly allows local plans to set their own standards (policy PM13).
- **Leadership is missing.** Government has left embodied carbon unregulated. The industry, Westminster and the City of London have each acted to fill the gap. The Plan says London has '*consistently and effectively achieved higher standards than those set by national requirements*' on energy (paragraph 5.19), but on embodied carbon it sets limits far less stringent than those the industry has already prepared.
- **The GLA's own figures show the need.** The IIA says '*London is currently not meeting the Mayor's CO₂ emissions targets to reach net-zero by 2030*' (paragraph 4.10), and that the Plan as a whole is likely to have only '*mixed minor positive and minor negative effects*' on climate change (paragraph 7.27). The

Mayor acknowledged in May 2026 that London will not reach net zero by 2030 on its current trajectory, citing the grid. As the grid decarbonises, embodied carbon becomes a larger share of emissions (paragraph 5.38), and it is the part planning policy directly controls.

- **Housing capacity is protected.** The IIA notes that ‘in some cases’ keeping a building could reduce how much can be built on a site (paragraph 6.263). We agree, and the sequential test deals with it: check (b) asks whether the existing building can meet the needs of the proposed use. A building that limits capacity will fail that check, and demolition can go ahead with the reason recorded. Paragraph 5.31, by contrast, lets capacity override retention in every case without showing that it should. Keeping, extending and building on top of existing buildings can often deliver both carbon savings and more homes.

Is it sound?

- **Positively prepared: Yes.** We note that paragraph 5.31 puts site capacity and commercial space ahead of retention without any way of striking the balance. But our objection belongs under the other three tests.
- **Justified: No.** The IIA considered no alternatives to GHR3 (paragraph 6.266). Yet for GHR1, the energy efficiency policy, it did consider a more ambitious option and explained why it was not chosen. The carbon limits are not shown to come from any carbon budget, and a falling schedule like the one in the industry-prepared UKNZCBS was an obvious alternative that was not assessed.
- **Effective: No.** A duty to assess, combined with paragraph 5.31, does not lead to any definite outcome. The policy contradicts itself on who it covers. The aspirational targets have no date, so they can never be delivered or monitored. Comparisons between options are not controlled, so results will vary between applicants and between boroughs.
- **Consistent with national policy: No.** National policy gives substantial weight to improving existing buildings. Paragraph 5.31 tells decision-makers to discount the analysis that would show those benefits.

5. MBUL7: London's heritage

What the policy does now

We welcome two parts of MBUL7:

- **Part G** supports energy efficiency improvements, low carbon heating, renewable energy and overheating measures on heritage assets, where these strike the right balance with protecting their significance.
- **Part A** asks boroughs to use the Greater London Historic Environment Record to identify heritage assets and what they can contribute to sustainable growth.

The problem

MBUL7 does not deal with reusing heritage assets themselves, especially those at risk. That only appears in the supporting text (paragraph 2.98), which says there are '*opportunities*' for the '*beneficial re-use of heritage assets that are on the At Risk Register*'. Supporting text is not policy, and '*opportunities*' sets no expectation. Nothing in MBUL7 tells a decision-maker how much weight reusing a heritage building should carry.

What we are asking for

1. **Move the reuse of at-risk heritage assets into the policy itself**, as a presumption in favour of adaptive reuse for designated assets on the Heritage at Risk Register and for non-designated assets identified locally as at risk.
2. **Say that neglect is no excuse for demolition**. Where a building's poor condition results from neglect, that condition should not justify knocking it down.
3. **Link heritage and carbon checks**, so that the GHR3 sequential test and the heritage assessment run as one exercise rather than two.
4. **Add a Heritage at Risk indicator to the Plan's monitoring**. The only heritage indicator at present covers World Heritage Sites.

Why we think this is right

The new NPPF rewrote national heritage policy in August 2026:

- **Reuse is now a named public benefit**. Where a scheme would harm a designated heritage asset, the harm is weighed against public benefits. National policy now names two such benefits: '*securing the long-term reuse of a vacant or underused listed building*', and enabling energy efficiency and low carbon heating (policy HE6(4)). MBUL7 Part G already covers the second. The Plan has nothing on the first.
- **Conservation means keeping buildings in use**. Proposals should '*maintain or secure a use consistent with their conservation*' (policy HE4(1)(a)).
- **Neglect cannot be rewarded**. Where there is evidence of deliberate neglect, the building's poor state '*should not be taken into account*' (policy HE4(3)).
- **Demolition cannot be approved on spec**. Loss of a heritage asset should not be approved without reasonable steps to make sure the replacement actually gets built (policy HE10(1)(a)).

- **Plans should identify assets at risk.** National policy expects plans to identify heritage assets '*including those heritage assets at most risk through neglect, decay or other threats*' (policy HE1(1)(a)). MBUL7 Part A does not mention assets at risk.

Is it sound?

- **Positively prepared: Yes.**
- **Justified: Partly.** The IIA considered no alternatives (paragraph 6.66), and nothing explains why at-risk assets are only mentioned in supporting text.
- **Effective: No.** Supporting text that describes '*opportunities*' delivers nothing on its own, and no indicator measures what happens to at-risk assets.
- **Consistent with national policy: Partly.** Part G matches national policy on energy efficiency in heritage assets. There is no equivalent for reuse, neglect or assets at risk.

6. HN2: Protecting and reshaping housing

What the policy does now

We welcome HN2 Part C. Where affordable homes are to be demolished and replaced, it requires '*a robust assessment of the benefits and disbenefits of alternative options*' first, and asks for the benefits of demolition to be weighed '*against wider social and environmental impacts*'. It applies at every scale, with no referable threshold. It is the only place in the Plan where looking at alternatives to demolition is required in policy for all schemes.

For estate regeneration, paragraph 3.27 says schemes are '*expected to take into account*' the Mayor's Good Practice Guide, '*particularly in relation to considering alternatives to demolition and engaging with residents*'. To get Mayoral funding, strategic schemes that demolish affordable homes must show residents' support through a ballot.

The problem

- **There is no method.** Part C does not say what the assessment of alternatives must contain, does not mention whole life carbon, and is not linked to the audit in GHR3 or the Circular Economy Statement in GLE11.
- **There is no consequence.** An assessment is required, but nothing turns on what it finds. The IIA reaches the same view: it says the policy '*does not preclude demolition and rebuild*', that the benefits are '*difficult to measure*', and it records the climate effect as uncertain (paragraph 6.103).
- **Funding conditions cover only half the sentence.** Residents' support is a condition of Mayoral funding. Considering alternatives to demolition is only an expectation.

What we are asking for

1. **Give Part C a method.** The assessment of alternatives should take the form of the GHR3 audit and sequential test, using the simpler template for smaller schemes, and '*environmental impacts*' should expressly include whole life carbon.
2. **Add a retention-first assessment to the funding conditions for estate regeneration**, alongside residents' support. This uses a mechanism the Plan already operates.
3. **Measure it.** None of the indicators in Annex A shows whether Part C changes anything. Report every year how many approved schemes demolish affordable homes, how many assessed a retention or refurbishment option, how many went ahead with it, and why not where they did not. That would supply the evidence the IIA says is '*difficult to measure*' (paragraph 6.103).

Why we think this is right

- Estate regeneration is one of the largest sources of planned demolition in London, and national policy's '*substantial weight*' for improving existing buildings applies to it as to any other development.
- At scoping, a consultee asked the IIA to consider '*retrofit-first regeneration approaches*' as an alternative. The GLA's recorded response does not deal with that request, and the IIA considered no alternatives to HN2 (paragraph 6.105).

- HN2 also matters beyond housing. It shows the Plan already accepts that checking alternatives to demolition is reasonable for smaller schemes. The same logic supports the lower thresholds we ask for in GLE11 and GHR3.

Is it sound?

- **Positively prepared: Yes.**
- **Justified: Partly.** The IIA considered no alternatives, including the obvious option of specifying what the Part C assessment should contain.
- **Effective: Partly.** An assessment with no method and no consequence cannot be relied on to deliver anything, as the IIA itself recognises. A funding condition for retention would be easy to deliver, because one already exists for ballots.
- **Consistent with national policy: Partly.** National policy's weight for improving existing buildings applies to estate regeneration too.

7. Closing

We support the direction of the draft Plan, which goes further than the current Plan. But we do not think it shows the ambition or the leadership London needs on existing buildings and embodied carbon.

The Plan's own words, in paragraphs 5.30 and 4.95, already say that keeping existing buildings should come first. The policies do not make that happen. Where Government has left a gap, the construction industry, Westminster and the City of London have each stepped forward. The London Plan should be leading them, not following.

National planning policy now expects this and allows it. The GLA's own assessment shows why it is needed: London is not on track for its 2030 target, and the Plan as drafted is not expected to change that much. We ask the Mayor to use this Plan to lead.

Andy Yates

Director

For and on behalf of

The Engineers Reuse Collective CIC

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