Using planning to support retrofit

Topic resource

Planning for the Climate Crisis: A guide for local authorities

Publication Date: December 2025

RTPI Royal Town Planning Institute

tcpa

Introduction

One of the biggest challenges for the UK's transition to net zero is to retrofit existing buildings so that they are energy efficient and do not rely on fossil fuels for heating and cooling. Currently only 5% of homes in the UK use low carbon heating, and two thirds of households live in poorly insulated, cold and damp buildings.[1] The Climate Change Committee has found that the buildings sector has the biggest gap between current carbon emissions and the government's targets for reducing emissions.[2]

Much retrofit activity takes place outside of the planning system because it falls under permitted development. Although this means there are limitations on the scope of planning to support retrofit, it remains important for local planning to provide an enabling framework and make the process easy for those wishing to reduce the carbon impact of existing buildings.

What is retrofit?

The UK Green Building Council (UKGBC) provide the following definition of retrofit:

"Retrofit is the upgrading of homes across the UK to increase their energy efficiency and reduce or remove their reliance on fossil fuels for heating. In practice, this includes:

- **Insulating homes:** which can include a range of technologies and techniques such as roof insulation, cavity wall insulation, floor insulation, external insulation and high-performance glazing.
- **Replacing gas with electric**: removing a traditional gas boiler and replacing it with in a heat pump to heat the home. In addition, solar panels and a battery can be added to a home so that it produces its own on-site renewable energy.
- **Reduction of energy use:** through technology such as smart sockets and heat recovery systems to prevent wasted energy.

Retrofit can also include measures to improve the climate resilience of a home, such as the installation of external shutters and ventilation systems."[3]

Publication Date: December 2025

RTPI Royal Town Planning Institute

tcpa

Policy Context

The **National Planning Policy Framework** states that the planning system should 'encourage the reuse of existing resources, including the conversion of existing buildings.'[4] Whilst this clearly supports retrofit, there is very limited direction in planning policy or the planning practice guidance on how local authorities should achieve this. The **National Model Design Code** also identifies 'upgrading the energy performance of existing houses' as a key strategy for conserving natural resources and supports local authorities to promote this through local design codes.[5]

Householder retrofit does not usually require full planning permission. Common retrofit measures can usually be undertaken as permitted development including the installation of solar panels and heat pumps, draught proofing, improving insultation, and changing from fossil fuel to electric heat sources such as heat pumps. There are however exceptions to this, such as:

- Buildings in conservation areas, national landscapes, areas with Article 4 directions and listed buildings. In these areas, general permitted development orders do not apply, and planning permission may be required for common retrofit measures.
- Renewable energy installations that go above a certain size threshold.
- External wall insulation that materially changes the external appearance of the building.

This means that whilst development plan policies will not influence the majority of householder retrofit projects, there are opportunities for planning authorities to support retrofit measures in areas where permitted development does not apply.

A key consideration for retrofit is the impact on the historic environment. In 2024 Historic England updated their advice note on **Adapting Historic Buildings for Energy and Carbon Efficiency.**[6] It advocates a 'whole buildings approach' to ensure that measures are based on understanding of how the building works, alongside its historic significance and prioritises the most effective and sustainable interventions without hindering the opportunity for additional measures in future. The advice note marks a change in tone from Historic England, with Conservation Officers encouraged to weigh impact on significance should be balanced against the benefits of addressing climate change in listed building applications.

Retrofit can be expensive, and over recent years there have been a number of government grant schemes to help people pay for such measures, often targeted at low-income households. In the latest spending review, the government committed £13 billion to its **Warm Homes Plan**, which aims to improve the energy efficiency of millions of homes in England.[7] Full details of the plan are due to be published in late 2025. Grant schemes are often administered by local or regional government, meaning householders may need to look to local or strategic authorities for advice on grants and support. The new strategic authorities proposed to be set up under the English Devolution white paper[8] are proposed to have a significant role in coordinating and distributing retrofit funding from the warm homes plan, alongside new energy, planning and climate functions.

Key principles

When thinking about how the planning system can enable retrofit, local planning authorities should apply the following principles:

- The best approach to retrofit is to not need it at all. All new buildings should be built to the highest possible energy efficiency standards and without reliance on fossil fuels, incorporating smart energy technologies to allow the flexible use of energy. See our topic guides on net zero buildings.
- Consider using planning policy to set a presumption against demolition, to encourage the reuse and retrofit of existing buildings as a first priority. See our topic resource on resource efficiency and the circular economy.
- Emphasise how retrofit can help to meet a broad range of council objectives, including addressing inequalities and fuel poverty, and improving public health.
- Make the planning system easy for residents to navigate. Confusion about when planning permission is required, and inconsistencies in the availability of advice was recently recognised as a barrier to retrofit by government.[9] Authorities should provide clear advice to householders about when planning permission is required, which policies apply, and how to navigate the process.

RTPI Royal Town Planning Institute
tcpa

Figure 1: External insulation being fitted to a property façade. Source: Titov Dmitriy / Shutterstock.com

Good practice for plan making

As outlined above, the scope for planning policies to influence retrofit is limited as most common household retrofit measures usually fall within the parameters of permitted development. However, local authorities can encourage retrofit of existing buildings on development sites, and support appropriate retrofit where other considerations need to be balanced, particularly where conservation and heritage designations are in place.

Planning policies can:

- Set a hierarchy which seeks a 'retrofit first' approach, ensuring applicants investigate opportunities to reuse and refurbish buildings ahead of demolition and replacement.
- Promote the upgrading of energy performance of buildings when extension, renovation or conversion is taking place.
- Draft policies which mirror the approach set out in the Historic England guidance, giving weight to the public benefits of the proposal in terms of reducing emissions, and requiring these reductions to be quantified.
- For historic buildings, promote a 'whole building' approach, ensuring that retrofit responds to how the building works and are implementing the most sustainable

RTPI Royal Town Planning Institute
tcpa

measures, balanced with the need to preserve the historic environment.

- Where appropriate, set out guidance as to how local historic building typologies can be retrofitted to reduce emissions and energy demand in ways that will be acceptable.
- For policies governing household scale development, encourage applicants to consider futureproofing. This might include leaving space for heat pump installation in future, for example.

Figure 2: An air source heat pump installed outside a building. Source: Snapshot Freddy / Shutterstock.com

Decision making

For retrofit projects that require planning approval, decision makers should be confident that the proposals are the best strategy for the building, and that the applicant has paid careful attention to finding the best approach for the circumstances.

- Ask applicants to provide information detailing how the proposals represent the best approach for the building including justification that alternative measures that would cause less harm to the designated heritage asset and its setting have been fully considered.
- Where climate benefits are being claimed in support of the proposal, require these to be quantified.

- Ensure proposals avoid maladaptation: ensure that planning applicants have looked ahead to potential future uses and further retrofit opportunities, and that proposals do not hinder the ability to achieve these.
- Take care to ensure that any negative impacts of retrofit on local amenity are avoided or mitigated.
- Where climate benefits are being claimed in support of the proposal, require these to be quantified
- Ensure proposals avoid maladaptation: ensure that planning applicants have looked ahead to potential future uses and further retrofit opportunities, and that proposals do not hinder the ability to achieve these.
- Take care to ensure that any negative impacts of retrofit on local amenity are avoided or mitigated.

Box 1: Case Study
Westminster City Council 'Retrofit first' policy

Westminster City Council introduced a retrofit first planning policy as part of a partial review of its City Plan, aiming to accelerate progress toward its net zero target by 2040. Policy 43 – 'Retrofit First'- responds to the environmental cost of demolition and rebuild, recognising that retaining and upgrading existing buildings can significantly reduce whole-life carbon emissions.

The policy requires developers to thoroughly explore retrofit options before proposing demolition. It requires developers to submit a Retrofit Plan alongside planning applications involving new floorspace or substantial works. Proposals for demolition must justify why retrofit is not feasible, using criteria such as structural constraints, operational requirements, or public benefit. Where demolition is unavoidable, developers must conduct whole-life carbon assessments and meet embodied carbon targets aligned with LETI[10] benchmarks.

The policy also encourages extending the lifespan of existing buildings and the reuse and recycling of materials through requiring Circular Economy Statements.

Authors: Westminster City Council
Links: Partial review examination site[11] : Draft Retrofit SPD
Date: November 2024

Other planning tools

There are other planning tools available to local authorities that might be appropriate to support retrofit, particularly to encourage the appropriate and sensitive retrofit of historic buildings.

Supplementary Planning Documents (SPD)

An SPD can provide further guidance to planning applicants on the types of retrofit measures that may be appropriate for consideration in their project, and direct them to the type of permission required for such interventions. It may be of particular use for local authorities with a high concentration of heritage designations where applicants are likely to need consent for retrofit measures. Local authorities should note however, that the scope and remit of SPDs will change under provisions of the Levelling Up and Regeneration Act (see the guide to Planning Policy and Legislation in England for more information).

Local Development Orders (LDOs)

In some circumstances, it might be appropriate to use an LDO for retrofit measures. An LDO can grant planning permission for specified types of development, so could be used in conservation areas where permitted development does not apply. An LDO could include measures that the LPA is certain would enable effective retrofit without causing harm to the historic environment. To achieve this, certain design requirements can be included in the LDO. Similar outcomes can also be achieved through the use of neighbourhood development orders (NDO) which generally apply to smaller, neighbourhood scale areas.

Local listed building consent orders (LLBCOs)

An LLBCO can achieve similar outcomes to an LDO, in that it will establish consent for certain works that can be carried out on listed buildings within set parameters and areas, without needing listed building consent from the planning authority. They are best used where listed buildings share common characteristics,[12] but can enable a permissive regime for certain types of retrofit measures. In Kensington and Chelsea, an LLBCO was introduced in 2022 to enable the installation of solar panels on listed buildings.[13]

Case Study:
Green Heritage Homes, Bath and North East Somerset

The City of Bath is a World Heritage site, with a high proportion of listed buildings. The Council were concerned that householders were tentative about installing energy efficiency measures because of a misconception that they could not do so to historic buildings and because of the lack of joined up heritage retrofit advice. The Council secured grant funding to help overcome this challenge, and the project has included:

- Provision of tailored pre-application advice to encourage sensitive and appropriate retrofit measures, including joint site visits from a Council Conservation Officer, accompanied by a Retrofit Surveyor.
- Production of advice sheets to navigate common issues, such as applying for listed building consent.
- Creating an SPD on energy efficiency, retrofitting and sustainable construction.
- B&NES Council are also looking to develop a Local Listed Building Consent Order that would permit the installation of solar panels on listed buildings in some specific circumstances.

This project has been particularly successful in overcoming the common issue in retrofitting heritage buildings that retrofit coordinators and conservation officers can give contradictory advice because they are drawing on different knowledge. By bringing these two areas of expertise together, the project has provided an innovative solution to provide homeowners with joined up advice that they can rely on.

Authors: Bath and North East Somerset Council
Links: Advice sheets : SPD
Date: 2022

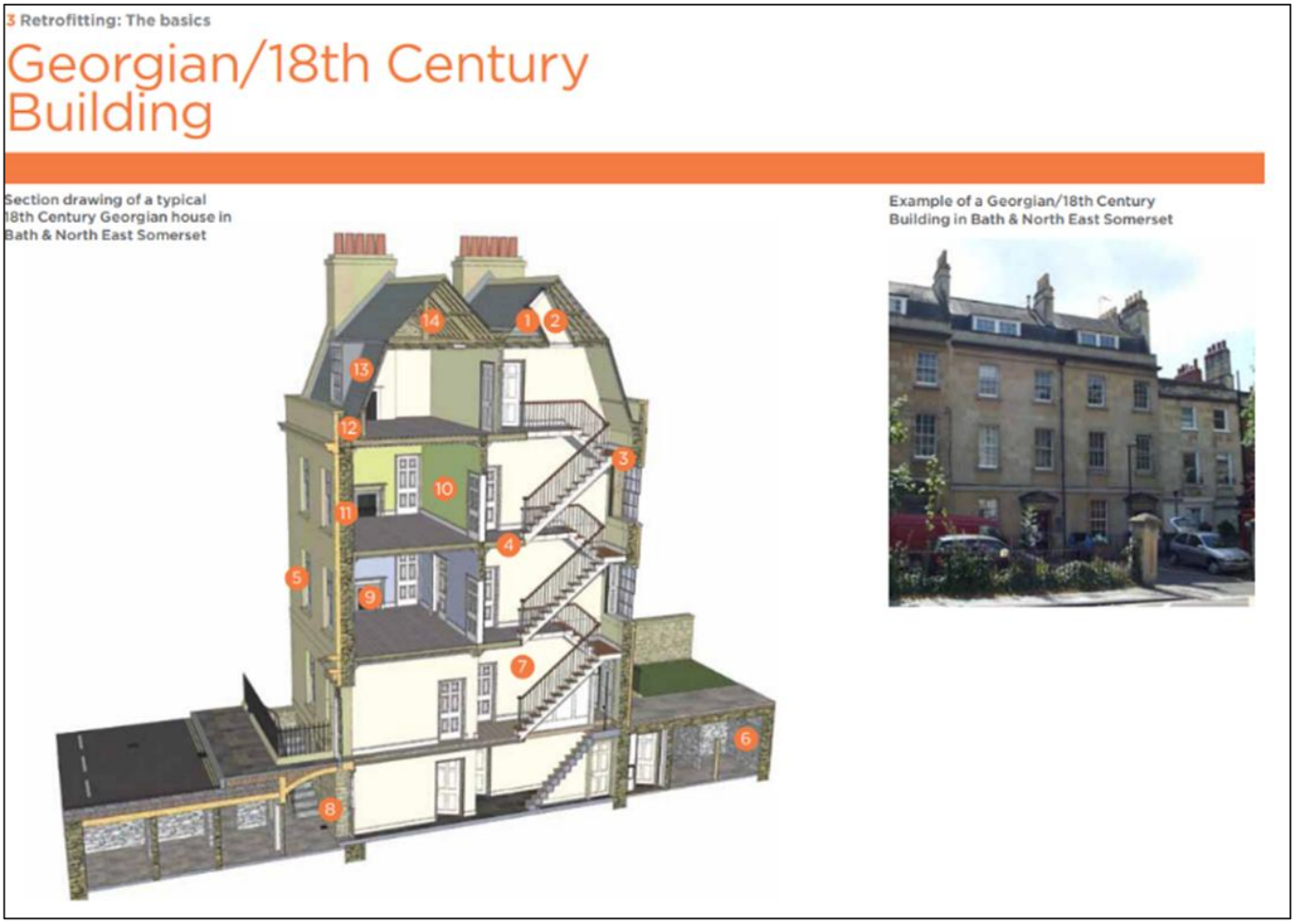

Figure 3: Extract from Bath and North East Somerset Council SPD - Energy Efficiency, Retrofitting and Sustainable Construction.

Horizon scanning

- The Warm Homes Plan is due to be published by government in late 2025.
- London Councils have commissions a new guidance document on the retrofit of historic buildings.
- The Devolution agenda in England includes proposals for the creation of strategic authorities in England, made up of groups of local authorities with enhanced powers and responsibilities. This is likely to change the governance of retrofit support, as strategic authorities are likely to allocate funding at a regional level via the Warm Homes Plan.

Further Resources

UK Green Building Council (UKGBC)

UKGBC host a range of resources and information on retrofit on their website, for local authorities, developers and other stakeholders. Their Local Authority Retrofit Toolkit is designed to help local authorities facilitate and supporting homeowners in upgrading their homes for energy efficiency and carbon reduction.
https://ukgbc.org/our-work/home-retrofit/

Retrofit information, support and expertise (RISE)

A project funded by DESNZ to provide guidance, training and support for social housing providers, local authorities, and other stakeholders taking forward retrofit projects. Its website includes a toolkit of resources which provide guidance on key activities across a retrofit project lifecycle to support successful planning, delivery, follow-up and monitoring. It also includes guidance on retrofit of historic buildings.
https://riseretrofit.org.uk/

Don't Waste Buildings – Planning Policies

Don't Waste Buildings have created a guide setting out the legislative and policy enablers for retrofit, and local plan policies that promote the retrofit of buildings ahead of demolition and new build.
https://www.dontwastebuildings.com/resources

Historic England - Adapting Historic Buildings for Energy and Carbon Efficiency

Historic England's (HE) advice note aims to guide owners, professionals, and planning authorities on how to sensitively adapt historic buildings to improve their energy and carbon efficiency while safeguarding their heritage value. It sets out HE's starting position on common retrofit interventions and sets out guidance on decision-making processes, including how to give weight to the environmental benefits of retrofit works.
https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/heag321-adapting-historic-buildings-energy-carbon-efficiency/

RTPI Royal Town Planning Institute
tcpa

References

[1] *Retrofitting homes for net zero.* Energy Security and Net Zero Committee, House of Commons, 2025. https://committees.parliament.uk/publications/48054/documents/251274/default/

[2] Ibid.

[3] *Home Retrofit.* UKGBC. https://ukgbc.org/our-work/home-retrofit/

[4] *National Planning Policy Framework.* MHCLG, 2024. (Paragraph 161)

[5] *National Model Design Code Part 2 Guidance Notes.* MHCLG, 2021. (Page 79). https://www.gov.uk/government/publications/national-model-design-code

[6] *Adapting Historic Buildings for Energy and Carbon Efficiency.* Historic England, 2024. https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/

[7] *Department for Energy Security and Net Zero, 2024. https://www.gov.uk/government/news/help-to-save-households-money-and-deliver-cleaner-heat-to-homes*

[8] *English Devolution White Paper*. MHCLG, 16 December 2024. https://www.gov.uk/government/publications/english-devolution-white-paper-power-and-partnership-foundations-for-growth/english-devolution-white-paper

[9] *Adapting historic homes for energy efficiency: a review of the barriers*. MHCLG and DESNZ, January 2024. https://www.gov.uk/government/publications/adapting-historic-homes-for-energy-efficiency-a-review-of-the-barriers

[10] The 'London Energy Transition Initiative', which has published a range of guidance on buildings and net zero: https://www.leti.uk/

[11] At the time of writing the plan is under examination, but the Inspector's post-hearing note has found the policy to be sound and in general conformity with the London Plan

[12] *Retrofit for heritage buildings: lessons learning from local authority innovations.* Regen, 2025. https://www.regen.co.uk/insights/retrofit-for-heritage-buildings

[13] Visit the Royal Borough of Kensington and Chelsea website for more information: https://www.rbkc.gov.uk/planning-and-building-control/heritage-and-conservation/sustainably-retrofitting-your-home

Acknowledgments

With thanks to the **Centre for Sustainable Energy** for their input into this topic resource. Visit their website for further information and resources: https://www.cse.org.uk/

Cover image: Solar panels fitted to the roof of a house. Licensed under CC-BY-SA-NC
Icons: Flaticon.com by iconixar

Using planning to support retrofit
Topic Resource 12
Planning for the Climate Crisis: A Guide for Local Authorities
©TCPA. December 2025
Fifth Edition

Publication Date: December 2025