

**Stennett, Jasmine**

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**From:** Craig Slack [REDACTED]  
**Sent:** 02 February 2026 09:12  
**To:** Planning Policy Consultations  
**Cc:** [REDACTED]  
**Subject:** City Plan 2040 Modifications - comments from Dominus

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To whom it may concern,

We write to make a comment about the Main Modifications to the City's draft Local Plan 2024 that is undergoing examination by the Planning Inspectorate. The Main Modifications are out for consultation till 6 February 2026.

The Main Modification that we seek to make a comment about is MM34. This seeks to introduce a sentence to support Policy DE1 (concerning sustainable design) that will allow the City to require minor developments to be subject to London Plan carbon emission targets, which in the London Plan apply to major developments, and other sustainability considerations. MM34 reads:

*'For minor development that includes substantial works (including substantial retrofit, extension), more detailed sustainability information may be requested to demonstrate policy alignment, such as consideration of London Plan carbon emission targets, carbon options appraisal or BREEAM requirements.'*

It is currently unclear about what specific minor developments this would apply to. There does not appear to be any definition for 'substantial works'. If this is to apply to any or all minor developments, it will undoubtedly deter the re-use of existing buildings because developers will not have the confidence that such a re-use does not come with a large financial cost for meeting carbon targets. It might lead developers to consider that a demolition of a building is more financially viable than a re-use of a building.

We note that the City has recently published its updated version of its Carbon Optioneering Guidance, in December 2025. This document instructs that carbon optioneering is required for minor developments where more than 50% of existing floor slabs are being demolished. We think MM34 would be more precise if it were to reflect the Carbon Optioneering Guidance in this respect, and require a consideration of London Plan carbon emission targets and other more detailed sustainability information where more than 50% of existing floorspaces are being demolished. This would give developers more confidence about requirements and would encourage the re-use of buildings.

Kind regards



**Craig Slack**  
 Planning Associate

A. [REDACTED]