

# Preserve or Explain

## Part 2: Background Report

Service translation of the original document Bevar eller Forklar Del 2: Baggrundsrapport

Støttet af

**Bevar  
mere.**

## Preserve or Explain

### Part 2: Background Report

February 2026

Edition 1

ISBN: 978-87-976970-0-9

## Prepared By

Ove Arup & Partners Danmark A/S in collaboration with Aaen Engineering ApS

## Authors

Arup Denmark: Peter Vangsbo, Kimberley Perry, Ayoe Emilie Skotte, William Schou

## With Input From

Aaen Engineering: Amanda Honoré Højerup, Johanne Djernes Østergaard

Roskilde Kommune: Camilla Dahl, Klaus Kellermann

Aarhus Kommune: Rune Skjøt Andersen

Plan 22+: Rasmus Blindum

Kommunernes Landsforening (Local Government

Denmark): Lærke Cecilie Bjerre, Thomas Jensen,

Mette Hansen

City of London: Kerstin Kane

Hilson Moran: Andrew Moore, Samuele Rando

Arup UK: Miriam Graham

DOMINIA: Asger Juul-Pedersen

CGJensen: Poul-Erik Olsen

3XN/GXN: Lasse Lind

3XN/GXN/Arup: Grace Di Benedetto

The National Social and Housing Agency: Nana Weien

Okholm,

Helle Reder Momsen

## Graphics

Isabelle Olsson

Sandra Cuffe

Ayoe Emilie Skotte

Jarl Gottlieb

Morten Meldgaard

## Proposed Citation

Vangsbo P., Perry K., Skotte A., Schou W. (2026) Bevar eller Forklar - Del 2: Baggrundsrapport.

## Funded By

*The project is supported by Bevar Mere – an initiative backed by Grundejernes Investeringsfond, Landsbyggefonden, Dreyers Fond, and Realdania.*

*The project is one of a total of 17 projects developing knowledge and tools to create future housing within existing buildings.*





*Results from the 17 projects will be published in 2026.*

*Read more at [www.bevar-mere.dk](http://www.bevar-mere.dk)*

Støttet af

**Bevar  
mere.**

# Content

-  01 The Methodology Behind the Preserve or Explain Tool.....13
  
-  02 Insights from London.....19
  
-  03 Empirical Basis for the Preserve or Explain Tool.....21
  
-  04 Conclusion.....37

# Glossary

## **Carbon optioneering**

A CO<sub>2</sub>-based evaluation designed to enable early and consistent assessment of potential building project design options. The purpose of carbon optioneering is to compare different possible design scenarios for a given site. The method informs assessment and decision-making processes and increases transparency regarding how applicants have arrived at a proposed project design.

## **Greater London Authority (GLA)**

The Greater London Authority (GLA) is the devolved regional authority for Greater London. The GLA has strategic responsibility across London and prepares The London Plan, which constitutes the statutory overarching strategy for urban development, land use, and regeneration throughout Greater London. The GLA is therefore responsible for the strategic policy framework that both London's 33 local planning authorities and developers must comply with, particularly in relation to urban development, sustainability requirements, CO<sub>2</sub> reduction, and long-term planning objectives.

## **Life Cycle Assessment (LCA)**

Life Cycle Assessment (LCA) is a method used to assess the environmental impacts of a building throughout its entire life cycle. Depending on the scope of the assessment, this may include impacts associated with material production, operational emissions, maintenance, and end-of-life stages.

## **Life Cycle Costing (LCC)**

Life Cycle Costing (LCC) is the calculation of all economic costs associated with a building over its entire lifespan, including construction, operation, maintenance, and replacement of building components.

## **Local plan**

A municipal planning instrument that sets out legally binding provisions for a specific area, including future land use, building form, and a range of other planning conditions. The local plan has direct legal effect for property owners, tenants, and users within the area it covers.

## **SAVE**

SAVE (Survey of Architectural Values in the Environment) defines a method for mapping and registering cultural environments and assessing the preservation value of buildings. SAVE includes both an evaluation methodology and a register in which buildings are assigned preservation values on a scale from 1 to 9. Buildings with SAVE values of 1–4 are typically considered worthy of preservation.

## **Transformation**

In this report, the term “transformation” is used to describe a substantial alteration or adaptation of an existing building, where the building's function is adjusted to meet new requirements. This may include refurbishment, renovation, and extension, but does not involve complete demolition and reconstruction from scratch.

## **WLCA**

Whole Life Carbon Assessment (WLCA) assesses a building's total CO<sub>2</sub> footprint, encompassing all CO<sub>2</sub> emissions associated with the building over its entire life cycle. This includes emissions from material production, construction, operation, maintenance, and demolition.

# Renovation Classes

In Denmark, renovation categories are primarily defined based on energy consumption and energy demand during the operational phase. The Danish Building Regulations (BR18) define two renovation categories for residential buildings, both of which are based on calculated energy demand (Be18) and requirements for a minimum reduction in energy demand. These categories focus solely on energy efficiency and indoor climate requirements and do not address the extent of physical interventions in the building.

Supplementary definitions are found in standards and EU regulation, where renovation is understood more broadly. DS/EN 17680:2023 *Sustainability of construction works – Evaluation of the potential for sustainable renovation of buildings* distinguishes between maintenance, renovation, and refurbishment, but primarily focuses on process and performance and is therefore not well suited to differentiating between degrees of renovation. At the European level, a major renovation is defined as an intervention affecting more than 50% of the building envelope or the building's value.

Several research and development projects, including REBUS as well as the EU projects EPI-SCOPE and TABULA, work with differentiated ambition levels for renovation, typically distinguishing between standard and ambitious solutions, where the latter aim to reach new-build standards or near zero-energy levels. These approaches point towards an understanding

of renovation in a broader perspective that also encompasses resource use, productivity, and life-cycle considerations.

This project builds on the principles of Westminster's Retrofit First policy, where the retention and upgrade of existing buildings are prioritised over demolition and new construction. The approach has been adapted to a Danish context and further developed through close dialogue with project partners from the construction sector, with the aim of establishing an operational and practice-oriented framework for differentiating renovation levels. This framework reflects both the extent of physical interventions and the building's overall climate and resource impacts.

Figure 1 illustrates the different levels of preservation and how the associated renovation categories are defined within the Preserve or Explain tool.

Renovation classes and degree of preservation

<b>Renovation</b>	Replacement of external building elements (façade and roof), finishes, and routine maintenance works. Works on parts of the load-bearing structure to facilitate extension.	<i>Full preservation (85–100%)</i>
<b>Renovation + extension</b>	Replacement of external building elements (façade and roof), surfaces, and maintenance works. Localised works to parts of the load-bearing structure to facilitate the replacement of elements above. Works on parts of the load-bearing structure to facilitate extension.	<i>Substantial preservation (50–85%)</i>
<b>Deep renovation</b>	Replacement of external building elements (façade and roof), finishes, and routine maintenance works. Demolition of up to and including 50% of floor slabs.	<i>Partial preservation (15–50%)</i>
<b>Deep renovation + extension</b>	Replacement of external building elements (façade and roof), finishes, and maintenance works. Demolition of up to and including 50% of floor slabs. Works on parts of the load-bearing structure to facilitate extension.	
<b>New construction</b>	Replacement of external building elements (façade and roof), finishes, and maintenance works. Demolition of more than 50% of floor slabs or load-bearing structures.	<i>Minimal or no preservation (0–15%)</i>

Figure 1: Degree of preservation and associated renovation classes applied in the Preserve or Explain tool

# Introduction

This Preserve or Explain publication consists of two interrelated documents which together address a central question in the green transition of the built environment: How can we systematically assess whether a building should be preserved and transformed – or whether selective demolition and new construction can be justified?

**Part 1: Preserve or Explain – The Tool** introduces a concrete proposal for a Preserve or Explain tool developed with municipal planning departments as its primary target audience. The tool describes how authorities, as part of local plan processes, can set clear requirements for systematic assessments of the potential of existing buildings before a local plan is prepared without preservation requirements and demolition permission is thereby granted. The Preserve or Explain tool provides a practical methodological framework for assessing an existing building's potential for preservation and transformation – covering environmental impacts, technical condition, and potential uses.

**Part 2: Preserve or Explain – Background Report** (this document) presents the data, structural arguments, analyses, and international experience that underpin the development of a Danish Preserve or Explain tool. It establishes why a more consistent preservation practice is essential for reducing climate impacts, strengthening architectural qualities, and promoting circular principles within the Danish building stock.

Although the tool is primarily aimed at municipal planning processes and developers, it is also relevant for developers, architects, engineers, and other actors within the construction sector. The objective is to document and preserve existing buildings and thereby contribute to reducing climate and resource

impacts, while safeguarding the value represented by the buildings we already have. Implementing a Preserve or Explain practice will influence processes and decision-making across the sector and therefore requires a shared understanding of the analyses and tests that will form the basis for future decisions on preservation, transformation, demolition, and new construction.

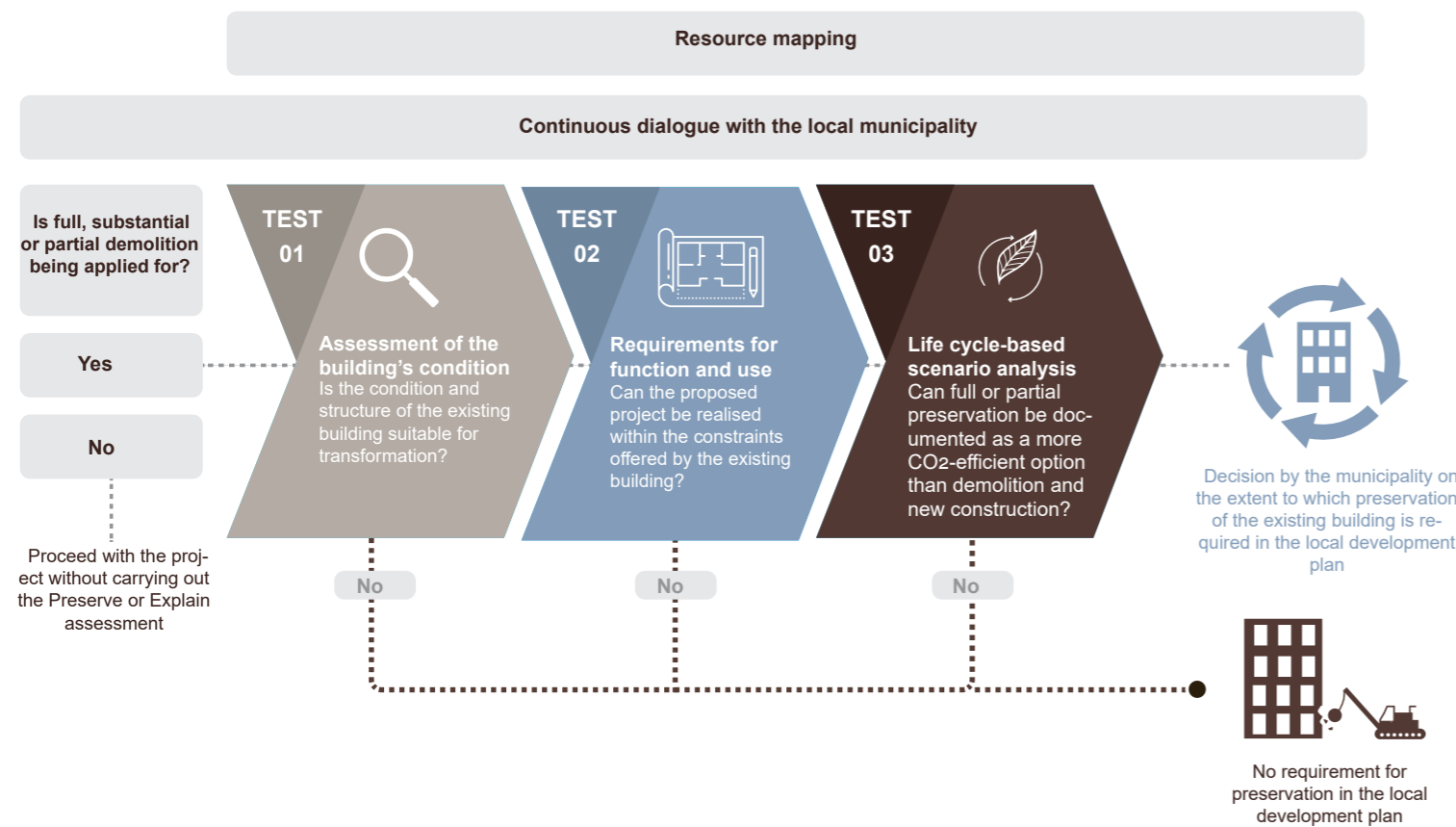


Figure 2: Process overview of the Preserve or Explain assessment

# 01

## The Methodology Behind the Preserve or Explain Tool



The project's methodology is based on a multidisciplinary approach, where knowledge sharing, practice-based experience, and close collaboration with stakeholders across the Danish construction industry together form a robust foundation for a Danish Preserve or Explain approach. The ambition has been to develop a tool that is both methodologically robust and applicable in the municipal planning context, where decisions on preservation, transformation, or demolition are made.

The methodology rests on three complementary strands: 1) Policy and practice analysis of relevant approaches in London, 2) Arup's experience from transformation projects in London, and 3) Broad involvement of Danish industry stakeholders to ensure adaptation to a Danish context.

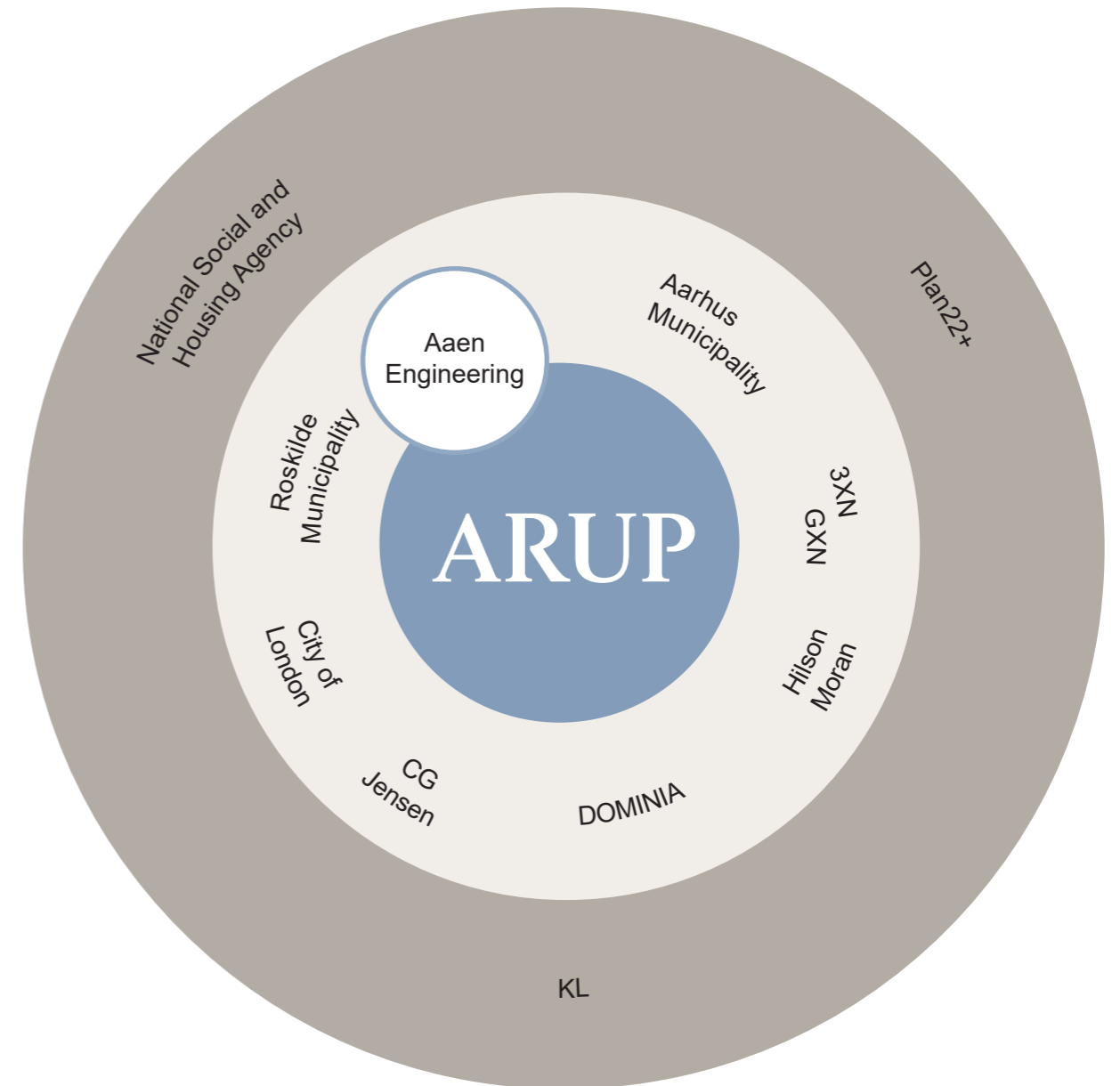
# The Methodology Behind the Preserve or Explain Tool

## Policy and Practice Analysis

The work is based on a systematic review of international experience, with a particular focus on Westminster's Retrofit First Policy and the City of London's Carbon Options Guidance. The analysis covers regulatory models, methodological standards, and decision-making processes used to compare transformation and new construction, life-cycle assessment (LCA) methodologies, and applicable Danish planning and building regulations. In addition, the SAVE methodology is included to identify the needs, opportunities, and considerations that must be addressed in the development of a Danish model.

## Practice-based Insights from Arup and Project Partners

A key element of the methodological foundation is the experience of Arup and the project partners from major transformation projects in London that have concretely undergone Retrofit First processes. These experiences provide detailed insight into the practical execution of carbon optioneering: which data must be gathered, how transformation scenarios and alternatives are developed, how trade-offs are made between environmental, economic, and functional considerations, and which typical challenges project teams encounter. This practice-based knowledge has been central to ensuring that the proposed Preserve or Explain tool is not only theoretically well-founded, but also operational and realistic to apply in concrete projects.



Figur 3: Overview over project team and collaborating partners

# The Methodology Behind the Preserve or Explain Tool

## Danish Stakeholder Involvement and Co-creation

The project's professional direction has further been shaped through extensive involvement of Danish stakeholders – including municipalities, consultants, developers, researchers, and industry organisations. Through interviews, workshops, and ongoing dialogue, these actors have contributed knowledge on local processes, data availability, capacity needs, challenges, and opportunities. In addition, the data collection included a questionnaire distributed via Plan22+ to Danish municipalities, through which 22 municipalities contributed valuable insights (see Figure 4).

This co-creation process has been crucial in ensuring that the tool both supports municipal case handling and is practically applicable for the multidisciplinary project teams responsible for carrying out analyses in the early stages of a construction project.

By combining evidence-based knowledge, international practice-based experience, and broad stakeholder involvement, the methodology establishes a robust and holistic foundation. This integrated approach forms the basis for the proposed Preserve or Explain framework and the accompanying tool.

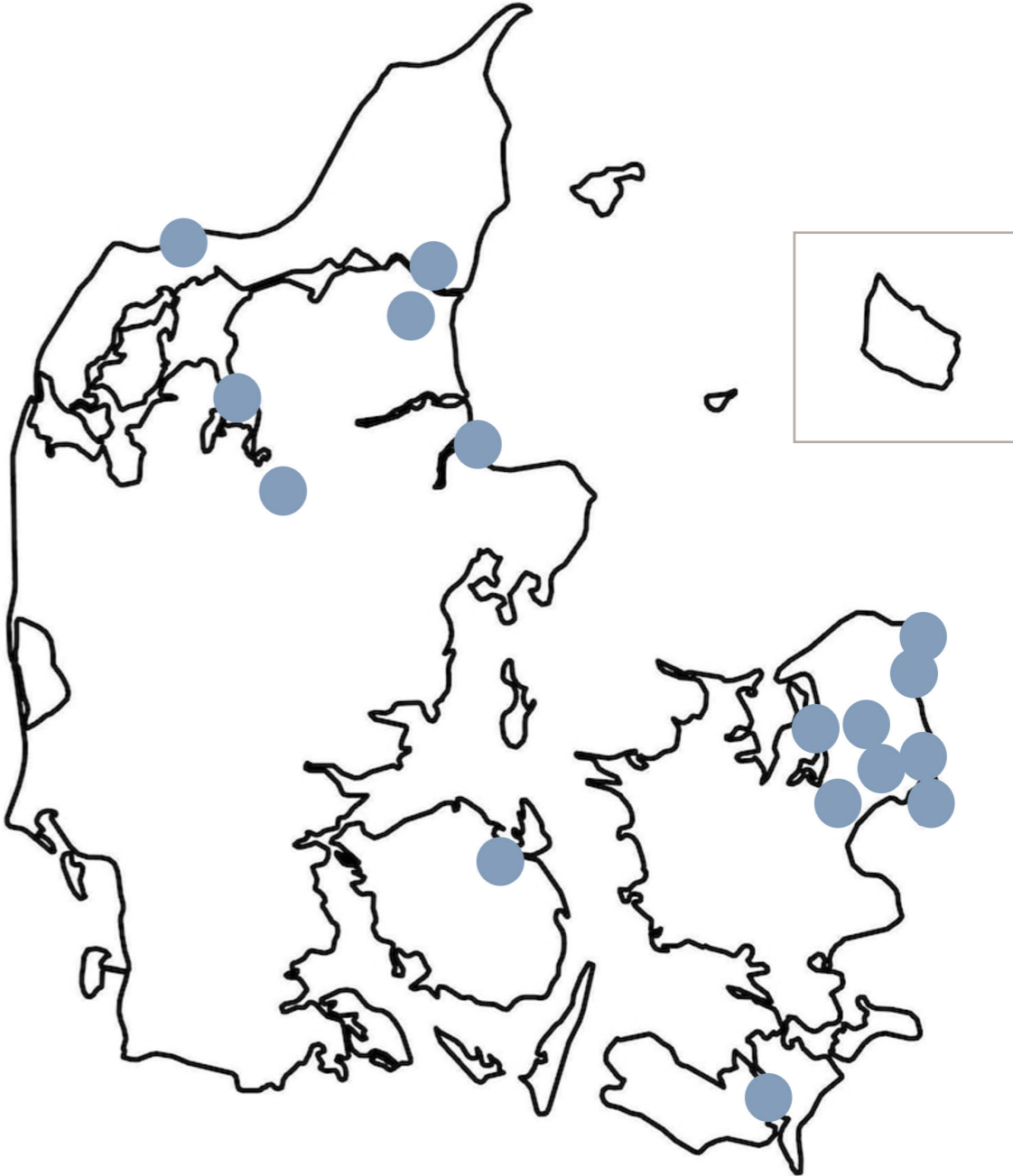
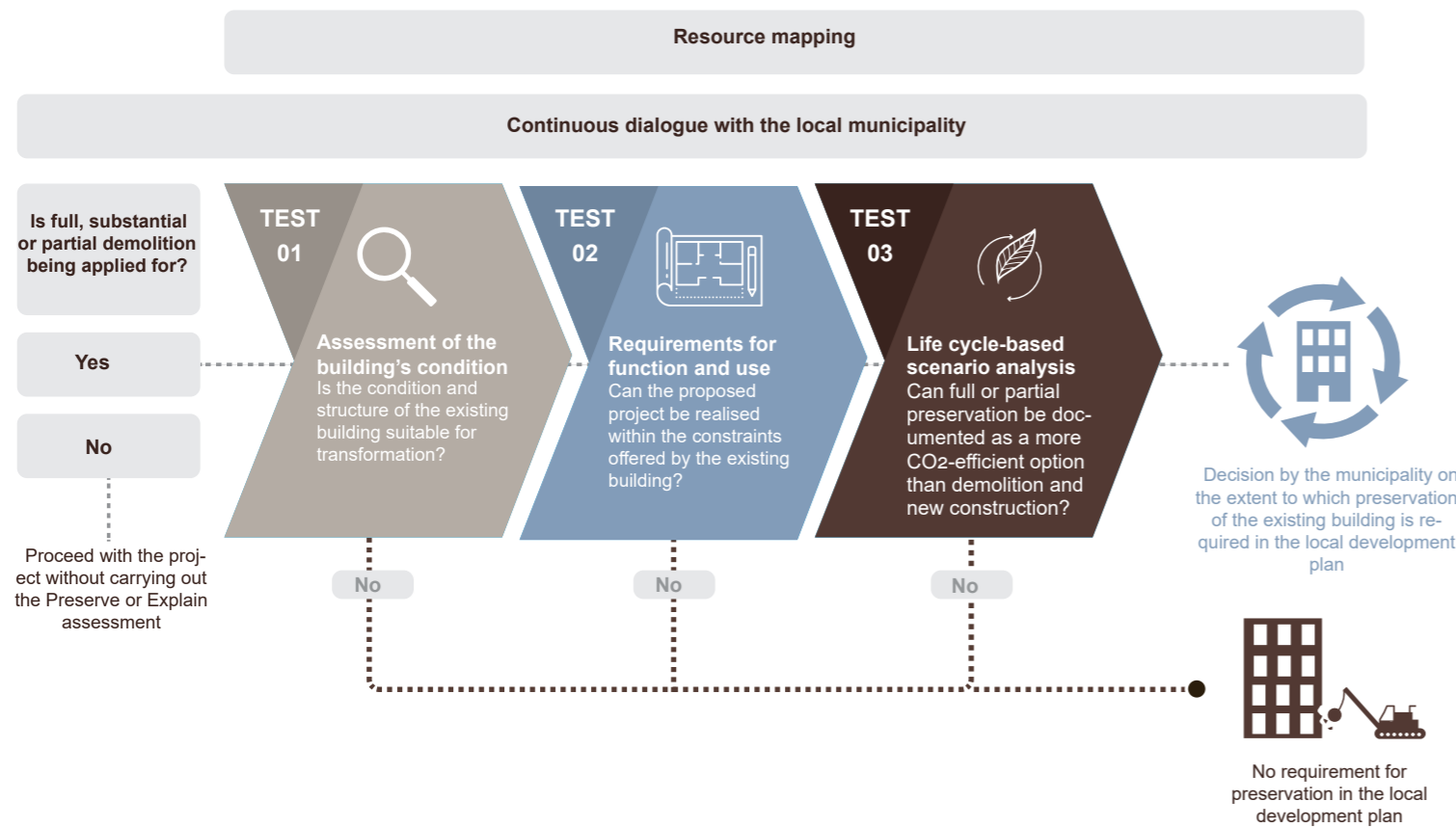


Figure 4: Overview over the non-anonymos municipalities participating in the survey



Repeating of Figure 2: Process overview of the Preserve or Explain assessment

# 02

## Insights from London



The section presents key experiences from London, where local planning authorities have developed and applied regulatory principles that support preservation, transformation, and reductions in resource use and CO<sub>2</sub> emissions. These experiences are used as a reference point for assessing transferable approaches within a Danish context.

# Insights from London

England has committed to achieving climate neutrality by 2050. Despite this, no national environmental requirements for construction have yet been established, either in the form of mandatory whole-life carbon assessments or principles such as Preserve or Explain. Regulation is instead largely handled by local planning authorities, which set their own policies and requirements, including those related to life-cycle assessment (LCA), circular economy principles, and preservation-oriented initiatives. Among the most forward-looking actors in this area are the City of London and the City of Westminster. Both form part of the Greater London Authority and are characterised by ambitious targets and active implementation of climate policy measures—particularly in relation to renovation, retrofit, and transformation.

In 2018, the Mayor of London declared a climate emergency. As part of delivering the ambitious objective of achieving net-zero CO<sub>2</sub> emissions by 2030, several planning and regulatory authorities in London, including the City of London and the City of Westminster, have introduced more stringent requirements for new development. These measures challenge traditional demoli-

tion-led practices and provide stronger support for the retention of existing building structures. The overarching approach is that opportunities for preservation and refurbishment must be systematically explored and prioritised before demolition can be considered. This includes a thorough analysis and assessment of the potential for retention, based on the building’s structural condition, alternative use options, climate impacts (including CO<sub>2</sub> emissions), and any constraints related to building regulations and technical requirements.

## City of London

Since 2021, the City of London has worked with the concept of Carbon Optioneering, which requires the investigation and comparison of opportunities for retaining existing buildings and materials in developments involving buildings of more than one storey. Carbon optioneering is carried out at an early stage, prior to submitting a planning application and ahead of other considerations in the planning process. The options are compared based on their climate impact and may, for example, include and assess:

- a) new construction,
- b) refurbishment,
- c) deep retrofit, and
- d) deep retrofit combined with extension.

In addition to comparing climate impacts, the structural performance and quality of the existing building(s) are assessed, including aspects such as façades, floor-to-ceiling heights, structural complexity, and related characteristics. Finally, the planning authority and the developer

may agree on additional assessment criteria against which the quality of the existing building and the potential for retention are evaluated, such as circular economy considerations and environmental certification.

This approach has resulted in a measurable shift, showing that a larger share of planning permissions is being granted to refurbishment and transformation projects. In 2024, the distribution was such that 50% of approved planning permissions were granted to projects in which more than half of the existing building stock was retained (see Table 1).

All major projects in the City of London involving buildings of more than one storey—including refurbishments, renovations, extensions, and transformation projects—underwent Carbon Optioneering in 2024 and 2025.

City of London applications for major development projects	2024	2025 (pr. 30/9)
Number of applications for major development projects (City of London)	17	15
% of applications in which more than 50% of the primary structure is retained (measured by mass)	50% (8/16)	47% (7/15)
% of applications in which less than 50% of the primary structure is retained (measured by mass)	50% (8/16)	53% (8/15)
% of applications for new development that include limited retention	56% (5/9)	50% (4/8)

Table 1: Statistics on applications for major refurbishments and new developments assessed by the City of London Corporation in 2024 & 2025 (City of London)

# Insights from London

## City of Westminster

In 2024, the City of Westminster presented a policy initiative—referred to as the Retrofit First Policy—aimed at promoting the preservation and transformation of buildings. The policy requires development projects exceeding 1,000 m<sup>2</sup> to undergo a series of sequential tests, intended to document and thereby justify any instances of substantial demolition. In addition, requirements for life-cycle assessment (LCA) with defined threshold values have been introduced, which in practice make it difficult to pursue new construction without retaining parts of the existing building.

As in the City of London, the methodology involves an assessment of existing building structure, building quality, and carbon optioneering, alongside other environmental considerations and broader societal factors, with the aim of doc-

umenting the necessity of demolition. The policy was developed in close collaboration with industry stakeholders, and despite initial concerns about resistance, subsequent debate and feedback have primarily focused on the technical details of the policy. This has demonstrated broad support for the underlying principle. Although the policy has not yet been formally implemented, it has quickly become a factor that is discussed in the planning of construction projects in Westminster. Figure 5 illustrates the process between local planners and external consultants, including third-party verification, in a typical development process related to the City of London’s Carbon Optioneering policy. A similar process applies in the City of Westminster and Camden.

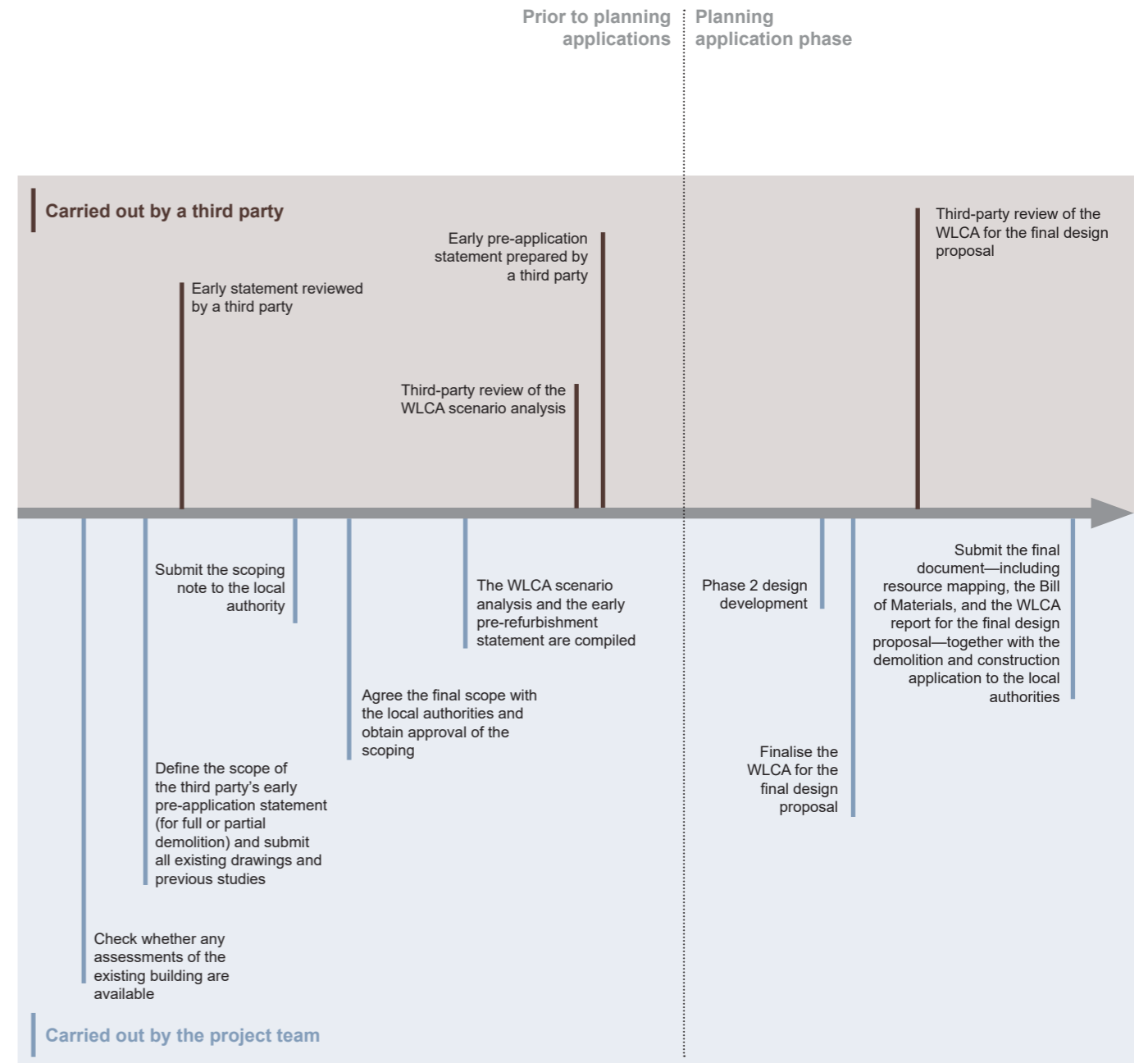


Figure 5: Overview of the planning application process involving the local authority planning officer and an appointed third-party reviewer under the City of London Carbon Options Guidance

# Insights from London

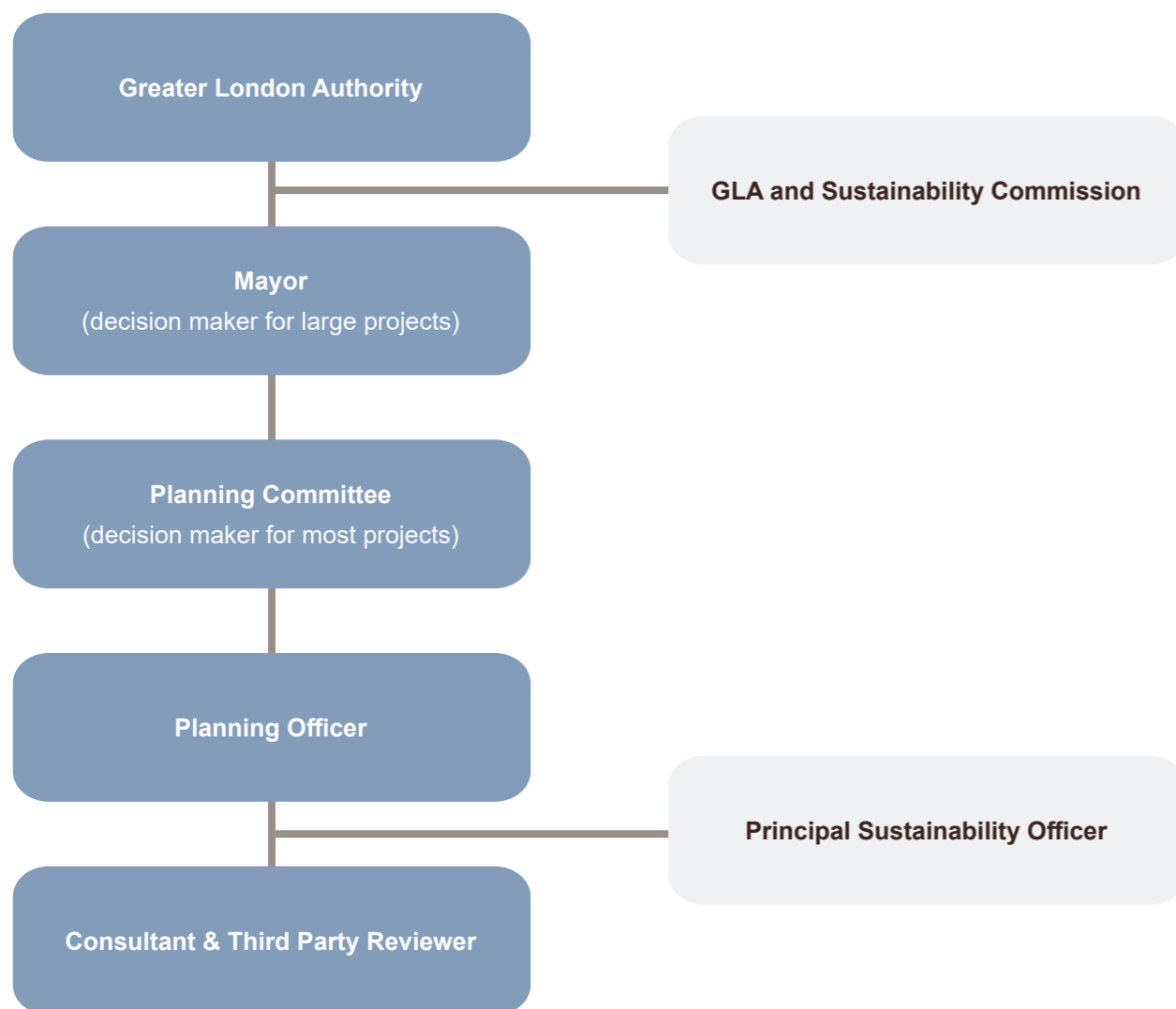


Figure 6: Overview of the organisational structure under the Preserve or Explain

## Political Structure and Allocation of Responsibilities Underpinning London's Carbon Optioneering and Retrofit First Policies

Both the City of London and the City of Westminster are governed by the Greater London Authority (GLA).

The GLA plays a coordinating role and ensures a coherent approach to governance and development across London. The authority has been instrumental in establishing the political and strategic frameworks that have enabled boroughs such as the City of Westminster and the City of London to develop and implement the policies described above.

The GLA is, among other things, responsible for supporting the regulation and harmonisation of standards for Life Cycle Assessment (LCA). In contrast to Denmark, these standards are not defined through national requirements. Beyond its regulatory role, the GLA actively facilitates coordination, funding, and knowledge sharing between London's boroughs with the aim of accelerating the implementation of climate policy measures. This collaboration is crucial to ensuring that experiences and best practices are systematically shared and embedded across administrative and geographical boundaries.

In addition, the GLA has appointed an 18-member Climate and Sustainability Commission (2025), composed of experts and stakeholders from a wide range of sectors.

Since 2002, the Commission has served as a direct advisory body to the Mayor on matters relating to sustainable initiatives and environmental policy. Its overarching mandate is to promote sustainable principles across all strategic decision-making processes, operating across traditional policy silos in order to identify and advance holistic solutions. This work is essential to ensuring that sustainability is not treated as an isolated objective, but as an integral component of all aspects of urban development and political decision-making.

Each borough also has its own Mayor, who is responsible for the implementation of construction projects and planning policy, including local plans. Within each borough, the Mayor oversees dedicated planning officers, case officers, and committees.

Figure 6 provides an overview of this organisational structure.

# Insights from London

## Experiences from London

The approach adopted in London stands out among other planning authorities in the UK. Only 7% of local planning authorities require a Whole Life Carbon Assessment (WLCA), and just 1.5% have requirements that explicitly support the preservation of existing buildings, for example through mandatory pre-demolition or pre-redevelopment audits. This illustrates that such an approach remains relatively uncommon at a national level.

While experiences from London demonstrate clear benefits for case handling and decision-making—and contribute to upskilling and capacity building across all involved stakeholders—it is also evident that the approach typically entails additional administrative costs and increased resource demands for all parties involved.

The added requirements in terms of documentation, time, and financial resources can have a dampening effect on incentives for smaller or less well-resourced local authorities elsewhere. This not only raises direct questions related to capacity and funding, but also gives rise to indirect concerns that development activity and investment may be diverted towards cities with less stringent regulatory requirements.

## Concluding Remarks on Experiences from London

Experiences from London demonstrate that ambitious Retrofit First measures can drive a significant transformation within the construction industry. At the same time, they highlight the importance of local adaptation when such principles are implemented in cities and areas with more limited institutional capacity and resources. There is broad recognition that smaller construction projects often do not have the same access to specialist consultants or the resources required for detailed analyses as large-scale urban development projects. We therefore assess that requirements for documentation and assessment should be applied proportionately, ensuring that they are aligned with project scale and local conditions when adapting Retrofit First approaches to a Danish context.

It is, however, worth noting that some smaller planning authorities have chosen to challenge traditional thresholds. For example, planning authorities in Plymouth and South West Devon have introduced policies that apply to all demolition and new-build projects—including single-family housing—in order to ensure that preservation and transformation principles are incorporated into the assessment. This approach has, in turn, raised questions of proportionality, prompting the development of guidance and procedural frameworks designed to enable implementation in a manner that is realistic for both authorities and developers.

Similarly, South Oxfordshire and Vale of White Horse have introduced differentiated LCA requirements as part of their Joint Local Plan—comparable to a shared municipal plan in a Danish context—reflecting considerations related to local economic conditions and the balancing of planning objectives.

In this way, experiences from London and the wider UK illustrate that Preserve or Explain principles can provide a robust framework for more sustainable planning practices. However, successful implementation requires that the principles be adapted to local conditions and capacities, ensuring that they are ambitious as well as realistic in different contexts.

## Case Study

# Euston Tower, Camden, London

Euston Tower, a commercial high-rise building located in the London Borough of Camden, has been vacant since the early 2020s. Situated between Euston Station and Regent's Park on the northern edge of central London, the tower represented pioneering workplace design when it was completed in 1970. Subsequent shifts in technology and working practices have, however, gradually rendered the building obsolete. By the 2010s, the building was largely unoccupied, and it has remained unused since.

Since December 2022, 3XN/GXN, have on behalf of British Land, and in close collaboration with Adamson Associates, DSDHA, and Arup, with Hilson Moran acting as third-party verifier, engaged with local stakeholders to shape a new future for Euston Tower. The proposal comprises a 52,000 m<sup>2</sup> and 32-storey building (levels 00–31), designed to meet contemporary expectations for sustainable, flexible office space.

Camden's planning policy requires that all proposals involving substantial demolition demonstrate that retention and improvement of the

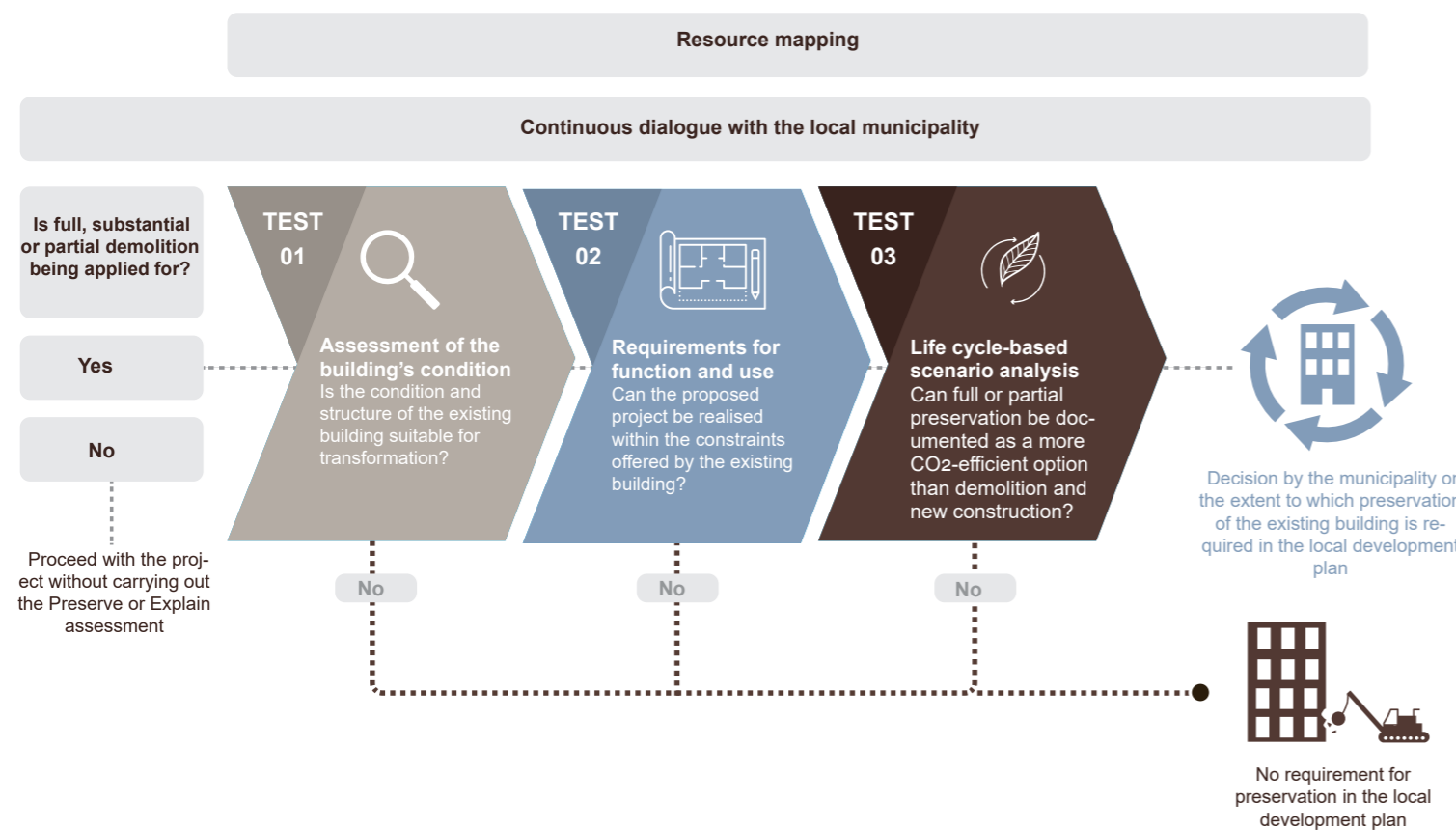
existing building are not feasible. Design teams are expected to apply creative and innovative solutions to adapt existing structures and to avoid extensive demolition wherever possible. All projects—whether refurbishment or new-build—must optimise resource efficiency and adhere to circular economy principles.

In response to these requirements, the project team undertook a detailed pre-development assessment, evaluating the condition of the existing building and analysing a range of retention scenarios. The assessment concluded that it was feasible to retain the foundations, basement structure, and the central reinforced-concrete core, which together account for 31% of the total concrete structure by volume.

As this solution still resulted in a substantial volume of concrete waste, the team also explored methods to preserve the value of the concrete. These included innovative reuse strategies for concrete removed from ribbed slabs, flat slabs, and satellite core walls.



Picture 1: Euston Tower, Camden, London. Photo Credit: 3XN/GXN



Repeat of Figure 2: Process overview of the Preserve or Explain assessment

# 03

## Presentation of Stakeholder Data



This section presents the empirical evidence and industry insights that underpin the work on adapting the Retrofit First principle to the Danish context. The focus is on practical experience, assessments of potential, and barriers related to implementation.

# Presentation of Stakeholder Data

Experiences from London indicate that a Preserve or Explain approach can strengthen both the circular transition and the quality of urban development.

Building on this, the project has explored how a comparable principle could be adapted and applied in a Danish context. To address this question, the project has drawn on existing research in the field as well as extensive stakeholder engagement across the Danish construction sector, including building control and planning departments in municipalities throughout the country. Inspired by the Retrofit First principle as applied in London, and by Arup's own experience with similar approaches, the project is founded on the development of a tool intended for political implementation. As a result, municipalities have played a central role in

identifying the political barriers that a Preserve or Explain requirement is likely to encounter during an implementation phase.

The perspectives of municipalities provide a nuanced picture of both the opportunities and the challenges associated with introducing a Danish Preserve or Explain model as a regulatory requirement. The following sections present the key insights that outline how such a requirement could be anchored in practice and the types of change it may drive.

This section summarises data collected through questionnaires, interviews, and workshops with Danish municipalities across the country. The findings are structured around a set of recurring themes identified through the analysis.

## Organisation and Allocation of Responsibilities

The analysis of responses from municipalities reveals a consistent national pattern in the organisation of demolition and building permit case handling. Building control departments constitute the core regulatory authority and carry the primary responsibility, typically staffed by architects, engineers, and building constructors. Planning departments often act as technical and professional advisors, particularly in cases involving deviations from local plans, heritage or preservation interests, or designated cultural environments, or where buildings are SAVE-listed. Planning departments are also responsible for preparing new local plans and managing the associated local planning processes.

In more complex or principled cases, the political level is involved, and several municipalities emphasise that preservation-related cases almost always acquire a political dimension. Organisational models nevertheless vary: some municipalities centralise preservation cases within the planning department, while others manage them within building control, with ad hoc involvement of the planning unit. In addition, a broad range of municipal functions—including environment, roads and mobility, cultural heritage, and GIS—are involved in cases characterised by high complexity.

## The Role of Local Plans and Associated Challenges

Local plans emerge as one of the most central instruments in development and demolition cases. However, municipalities often describe them as broad, outdated, or insufficiently precise with regard to preservation considerations. As municipalities can only refuse demolition where this is explicitly prohibited in the local plan, or where a building is designated with a high SAVE preservation value, the specific wording of local plans becomes decisive.

Consequently, many municipalities express a need to update existing local plans or to prepare new ones that more clearly embed preservation interests. Such plans can provide a concrete legal basis for prioritising transformation over demolition and thereby enable the refusal of demolition applications. At the same time, municipalities emphasise that local plan processes are slow and resource-intensive, which limits their ability to respond swiftly in cases where they would otherwise seek to retain existing buildings.

## Process Flow and Cross-disciplinary Collaboration

Municipalities describe a shared procedural framework in which applications for construction and demolition are submitted through the Byg & Miljø (*Build & Environment*) system and screened for completeness, legal compliance, and alignment with planning regulations. Requests for additional information are subsequently issued, with many municipalities seeking to limit this to a single request in order to maintain momentum. During the subsequent review, statements are obtained from internal units responsible for planning, environment, roads and mobility, and cultural heritage, with museums involved in selected cases. In more complex cases, dialogue is typically established through meetings and cross-disciplinary discussions before the technical assessment is translated into an administrative or political decision. While the overall procedural logic is broadly consistent across municipalities, the scope and intensity of the process vary significantly depending on the nature of the case and the capacity of the municipality.

# Presentation of Stakeholder Data

## Demolition and Preservation Considerations

Applications for demolition generally follow the same organisational and procedural pathways as other building permit cases. However, heritage and preservation value constitutes the central assessment criterion. Municipalities emphasise that, as a general rule, they lack the legal authority to refuse demolition unless the building is SAVE-registered in categories 1–3/4 (depending on municipal practice), or where binding preservation provisions are stipulated in the applicable local plan. In practice, this means that municipalities often have to grant demolition permits for buildings they might otherwise wish to retain on planning or cultural-historical grounds, if the planning framework does not provide a sufficient legal basis to enforce preservation.

For larger construction and demolition projects, this starting point changes significantly. Projects of a certain scale or character will typically trigger a requirement for a local plan under Section 13(2) of the Danish Planning Act, either because the proposal is not in accordance with existing planning provisions, or because it entails substantial changes to land use, urban structure, or the built environment. In such cases, demolition and new development become integral components of the local planning process. Through dialogue with developers and other stakeholders, municipalities can then establish concrete and binding provisions relating to preservation, transformation, scale, siting, and architectural expression. In this context, buildings with identified conservation value typically prompt more thorough planning assessments, internal deliberations, and often political consideration. Planning instruments such as temporary Section 14 prohibitions under the Danish Planning Act or the preparation of conservation-focused local plans may be employed to ensure that preservation considerations are explicitly incorporated into future planning. Some municipalities also apply demolition lists or similar practices, enabling cases to be escalated to the political level.

## Transformations, Professional Competencies, and Assessment Criteria

Transformations are assessed on the basis of a combination of architectural, planning, and legal considerations. Municipalities describe transformation projects as professionally demanding and typically architect-led, while demolition cases more often involve environmental considerations. Assessments are primarily based on heritage value (as defined by the SAVE methodology), planning conditions, and holistic evaluations of architectural, cultural-historical, and environmental aspects.

Applicants' own justifications form part of the assessment, but rarely carry decisive weight in the absence of an underlying planning or conservation rationale. Cases involving changes of use, historic environments, or significant planning exemptions are perceived as particularly complex. Such cases often lead to cross-disciplinary meetings, management involvement, and political decision-making, reflecting the absence of a standardised method for conducting these assessments.

## Tools and Decision-making Framework

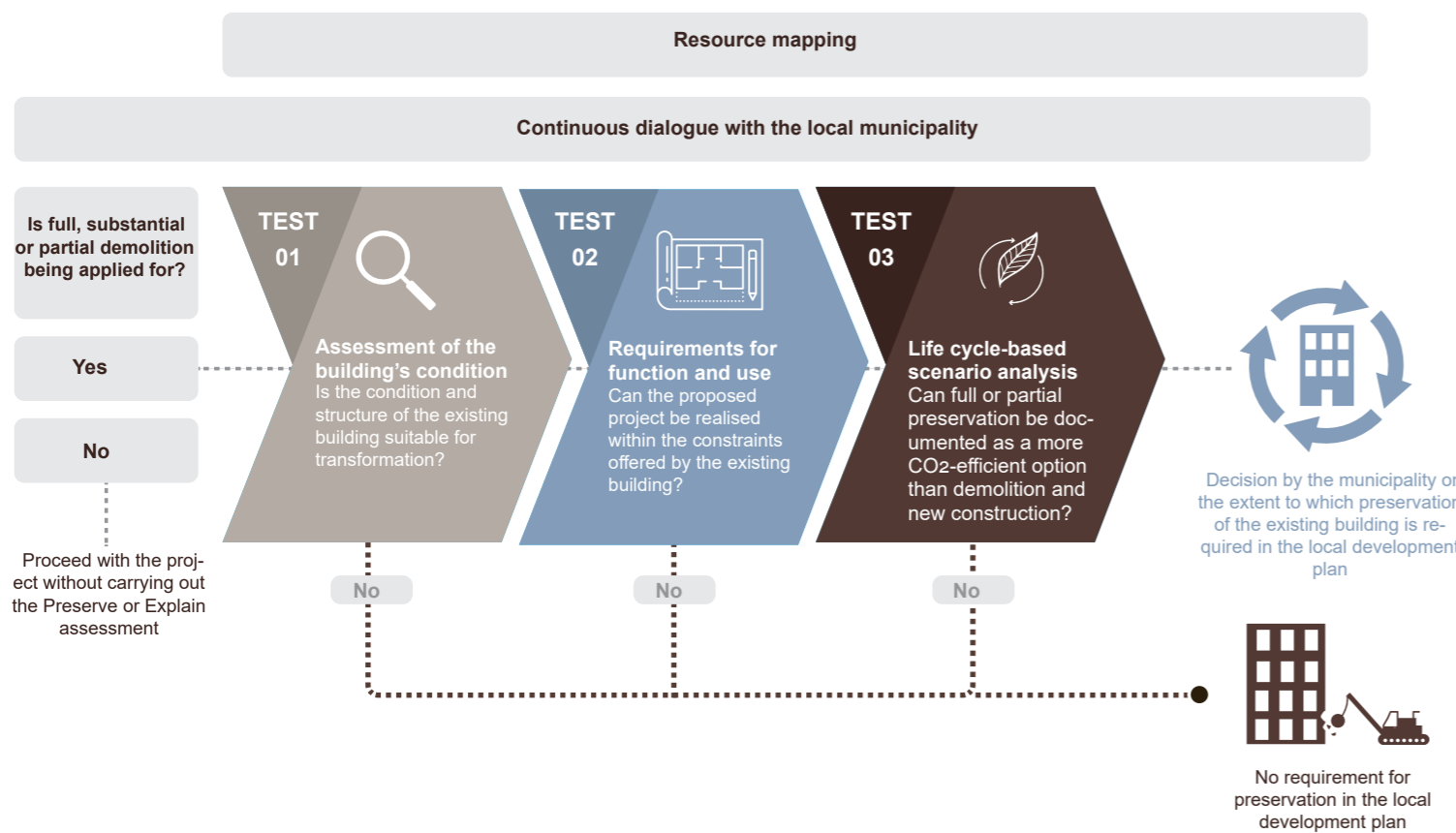
Municipalities rely on a broad range of data sources, including GIS layers, local plans, municipal planning frameworks, SAVE registrations, cultural environment atlases, BBR and OIS data, as well as on-site inspections. It is noted that the SAVE methodology is limited to assessing conservation value primarily from a cultural-heritage perspective.

In addition, the assessment framework is shaped by statutory and regulatory instruments such as the Planning Act, the Building Regulations, and easements and servitudes. Municipalities highlight challenges related to capacity, systematisation, and early-stage screening, which affect processing times and limit the ability to identify complex issues at an early stage of the case-handling process.

## Concluding Remarks on the Empirical Work

Overall, the analysis of the stakeholder-oriented empirical material shows that building control departments constitute the administrative core for smaller construction projects, while planning- and environment-related perspectives are decisive in complex and conservation-related cases. Conservation values act as strong political drivers, and both transformations and demolitions are increasingly assessed through holistic perspectives that cut across cultural environments and planning constraints.

Municipalities work in a cross-disciplinary manner, but experience significant capacity pressures. Their ability to steer development towards preservation and transformation depends to a large extent on the content of local plans and on political priorities.



Repeat of Figure 2: Process overview of the Preserve or Explain assessment

# 04 Conclusion



This concluding chapter brings together the background report's key conclusions and synthesises the analyses, arguments, and empirical evidence that collectively form the foundation for the Preserve or Explain tool. The chapter therefore marks the transition from documentation and investigation to direction and action. Based on the report's findings, a set of recommendations is presented outlining how the tool can be applied, operationalised, and embedded within planning processes and case handling. The aim is to ensure that the challenges identified through the analyses are translated into concrete, strategic, and practice-oriented measures.

Finally, the chapter outlines the next steps, with a focus on implementation, prioritisation, and further development. In doing so, it establishes a clear link between the report's knowledge base and the decisions and actions required to support a more balanced approach to preservation, transformation, and development.

# Conclusions and Recommendations

This background report constitutes Part 1 of the Preserve or Explain publication. The document presents the empirical foundation, including the collected data, analyses, and international experiences that have formed the basis for the development of a Danish-adapted Retrofit First/ Preserve or Explain approach. The report sets out the key structural arguments and professional assessments that point to preservation and transformation of existing buildings as essential instruments for reducing climate impacts, supporting architectural quality, and advancing circular principles within the Danish building stock. In addition, it highlights the most important framework conditions, opportunities, and barriers related to implementation in a Danish context. The combined data foundation forms the basis for the development of the Preserve or Explain tool, which is presented in Part 2 of the publica-

tion (Document 2/2). The tool is developed as a methodological framework designed to support municipal case handling by enabling a systematic assessment of preservation potential in relation to demolition. Finally, the report summarises a set of recommendations on how the tool can be anchored and implemented in municipal practice. These recommendations are based on contributions and input from both municipalities and key actors within the construction and real-estate sectors. The recommendations bring together the most important levers for strengthening the implementation of the Preserve or Explain tool in Denmark and are structured into three categories: (a) legal basis, (b) implementation in municipalities, and (c) political and economic instruments (see Figure 7).

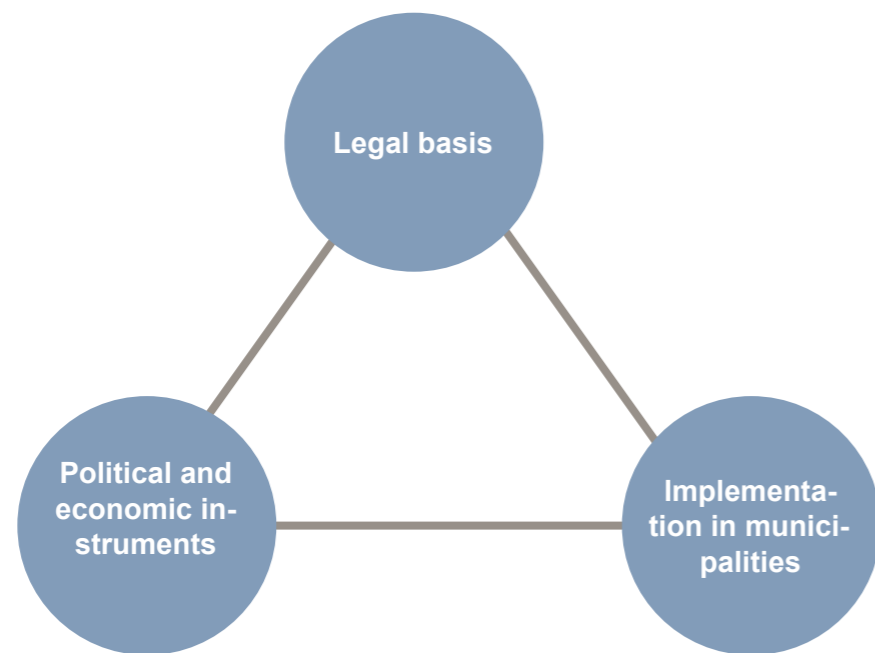


Figure 7: Categories of recommendations

## Legal Basis as a Prerequisite for Preservation and Transformation

A robust legal framework is essential if municipalities are to promote the transformation of existing buildings while also being able to refuse demolition applications. In the absence of a clear legal basis, municipalities are often left without the ability to prioritise preservation, even where building-related or cultural-historical values would warrant it. Requirements for Preserve or Explain assessments can be introduced at different levels, including through the Planning Act, municipal plans, and local plans. Based on input from stakeholders in Danish municipalities and experiences from London, this project recommends that municipalities actively integrate an assessment of existing buildings, with a view to establishing preservation requirements, as part of the local planning process. This approach provides the necessary legal authority for municipalities to refuse demolition applications where conservation considerations are relevant. At the same time, it strengthens the ability to prioritise transformation over demolition as a strategic objective in urban development.

## Implementation in Municipalities

The tool is intended for projects that trigger a local plan process, in which the Preserve or Explain assessment forms an integrated part of the planning work. The tool specifies the documentation that developers and their advisers must provide to support the municipality's assessment of whether preservation, transformation, or demolition should form the basis for subsequent planning decisions. The approach is generic and developed for a Danish context, but can be adapted to the individual municipality's planning practice, needs, and capacity. The purpose is to ensure a systematic and transparent decision-making basis, enabling municipalities to assess whether requirements for preservation or specific provisions should be incorporated into the local plan. It is recommended that municipalities appoint a designated sustainability professional responsible for coordinating communication across municipal departments and externally with the construction sector. This role would also be responsible for reviewing the submitted Preserve or Explain reports that accompany demolition applications. The model corresponds to the approach applied in London, where a Principal Sustainability Officer acts as a key interface between planning authorities, building control, and project stakeholders, ensuring that assessments are applied consistently and are professionally grounded within the decision-making process.

## Political and Economic Instruments to Support Implementation

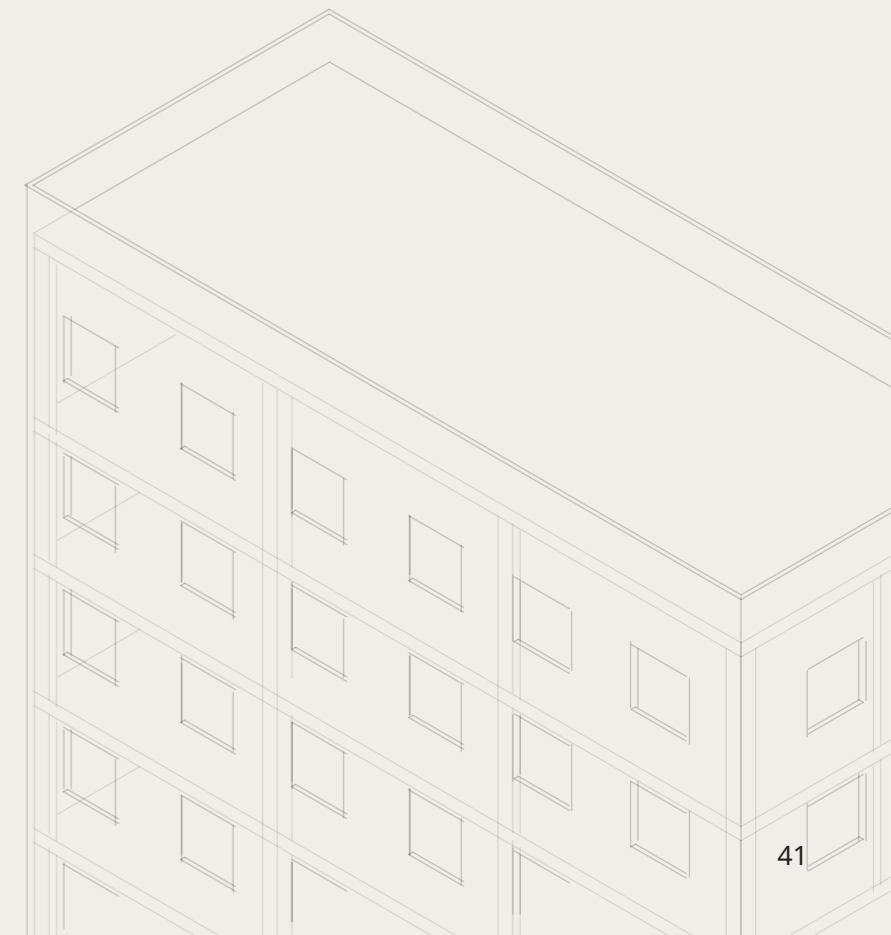
To facilitate the implementation of the Preserve or Explain tool and to secure support from stakeholders across the construction sector, municipalities may supplement the approach with political and economic incentives. A key instrument is the clear communication of a political commitment to Preserve or Explain, combined with the signal that applications prepared in line with, or explicitly addressing, a Preserve or Explain approach will benefit from a more predictable and streamlined application process. Such an approach not only provides a clear indication of municipal ambitions, but also reduces time and costs for actors who choose more sustainable solutions.

A further measure to strengthen the prioritisation of transformation as a first choice is the introduction of more flexible frameworks within the Building Regulations (BR18). The implementation process could be significantly supported if transformation projects were, to a greater extent, granted more flexible regulatory conditions—particularly in situations where it is technically or structurally challenging to bring an existing building fully up to current standards. One possible model would allow municipalities to grant exemptions enabling buildings to comply with the regulatory framework in force at the time of construction, combined with requirements for documented safety and functionality. Similar approaches are applied, for example, in the Netherlands, where flexible requirements for existing buildings have promoted transformation as a practical and economically viable alternative to demolition.

Introducing more adaptable provisions in BR18 for renovation and transformation would reduce costs and remove technical barriers that currently make refurbishment less attractive than new construction. Amendments to the Building Regulations could therefore become an important complement to other political and economic incentives.

At the EU level, policy development is moving towards a more holistic approach, in which environmental and climate impacts are assessed in an integrated manner. In the same direction, the Preserve or Explain tool should be further developed so that its assessments—particularly the associated life-cycle assessment—cover a broader range of impacts. This would strengthen the relevance of the tool and ensure a more comprehensive decision-making basis.

In addition, it is recommended to establish financial incentives, for example in the form of temporary property tax relief during the construction phase for transformation projects, on equal terms with new-build developments. Such a model could strengthen the economic conditions for prioritising renovation and reuse over demolition, while supporting municipal sustainability and preservation objectives. Contributors from the construction and real-estate industries involved in the project emphasise that a combination of simplified case handling and targeted financial advantages can create an effective, market-based incentive. This is assessed as having the potential to promote broader integration of preservation considerations and transformation as a natural part of standard industry practice.



# Next Steps

## Implementation Guide

The next natural step for the Preserve or Explain tool is the development of an implementation guide to support municipalities in integrating a Preserve or Explain procedure into their existing local planning practice. The purpose of the guide is to translate the project's recommendations into concrete workflows, processes, tools, and data sources that municipalities can apply directly within local plan preparation and case handling.

Such a guide can promote consistency across municipalities, while still allowing for local adaptation so that individual authorities can operate within their own planning frameworks, ambition levels, and organisational capacities. As a next step, an implementation guide would provide municipalities with a practical and operational point of departure, making it easier to introduce, anchor, and manage a Preserve or Explain approach as part of everyday planning and administrative practice.

## Pilot Projects

The tool should be tested in practice in order to gain concrete experience with the development and application of this type of instrument in a Danish context. A pilot phase would provide municipalities with insight into how the tool can be integrated into case handling processes, while actors in the construction industry gain practical experience in preparing and documenting the required analyses in real projects.

In this way, the tool can be further refined and provide the basis for a more consistent, efficient, and practicable approach across actors, supporting broader implementation and uptake in municipal planning and decision-making.

## Preserve or Explain for Single-family Houses

At present, the Preserve or Explain tool is directed exclusively at development projects that trigger a local plan process within municipalities, where the tool can be applied as a supplement to existing investigations and planning procedures in connection with the preparation of a new local plan.

It is recommended that a simplified version of the tool be developed for use by building control departments in the case handling of single-family houses. Such a tool would help prevent building applications from resulting in unnecessary demolition of existing buildings that have the potential to be preserved and transformed, but which fall outside the scope of projects that require a local plan.

