Chichester District Council

Planning Committee

Wednesday 6 December 2023

Public Consultation: Climate Change and Historic Building Adaptation Historic England Advice Note

1. Contact

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2. Recommendation

2.1. The Planning Committee is asked to note the contents of the Public Consultation: Climate Change and Historic Building Adaptation Historic England Advice Note, and to comment on and endorse the proposed response to the consultation (Appendix 1).

3. Background

3.1 Historic England are responsible for producing Advice Notes that provide detailed, practical advice to local planning authorities on how to implement national planning policy and guidance.

This new Historic England Advice Note (HEAN) covers Climate Change and Historic Building Adaptation. It aims to provide advice to local planning authorities, and others involved in the planning process, on:

- 1. The need for planning permissions and/or other consents for some of the common changes required to decarbonise and improve the energy efficiency of historic buildings.
- 2. Determining proposals to decarbonise and improve the energy efficiency of historic buildings to enable positive climate action.
- 3. How local plans and other planning mechanisms can deliver a positive strategy for historic buildings that proactively supports climate action.
- 3.2 The advice note will establish good practice in informing officer decisions on many applications involving decarbonisation and energy efficiency in listed and non-listed historic buildings, and works in conservation areas. The positions in the advice note broadly (with one notable exception) reflects the advice and guidance currently provided by officers.

3.3 The consultation period terminates on 24 December. A copy of the Historic England consultation document can be viewed online (see weblink below under 'Background Documents').

4. Consultation response

- 4.1 The consultation invites feedback on the advice note referred to above. The advice note covers a range of topic areas including works that affect various different types of heritage assets including listed buildings, non designated heritage assets and works in conservation areas;
 - Wall insulation external and internal
 - o Internal insulation, floors and roofs
 - Draught proofing
 - o Replacement of windows
 - Micro generation / renewables
 - Secondary glazing
 - Heat pumps
 - Electric vehicle charging points
- 4.2 All of these sections have a detailed analysis of what sorts of solutions can be acceptable and why. Examples are given and a clear direction of travel is provided to local planning authorities. The updated guidance from Historic England reflects advice already given by the Conservation and Design Team.
- 4.3 Section 81 of the guidance relates to the replacement of non historic windows in a listed building with double glazed replacements. This represents a key update to the approach taken by Historic England and by the Council as Local Planning Authority both in terms of advice issued and the determination of planning permission and listed building consents in respect of the installation of double glazing. At present, double glazing is usually resisted within historic window openings in listed buildings. This approach has been supported at appeal by the planning inspectorate and by Historic England themselves in the past. However, the new wording makes it clear that double glazing can be viewed as having only a minor effect on the overall character of a listed building, and given the benefits to thermal performance it can be acceptable. The acceptability of double glazing in listed buildings represents a change in the guidance. Given this shift in emphasis, the examples provided by Historic England, and the need to positively address climate change, the proposed approach is supported by the Council's Conservation and Design team. It is also highly likely that the planning inspectorate will take this view following publication of the HEAN.

- 4.4 Section 83 of the guidance relates specifically to how LPA's should assess the installation of double glazing within existing historic window frames in listed buildings, rather than replacing non historic windows with double glazing, which is dealt with by section 81 above.
- 4.5 This is another key change in approach in permitting the installation of double glazed units within existing historic window frames, except where this would require the removal of historic glazing, such as hand drawn or cylinder glass. It is important to note that this means the frames should be retained, with only the panes of glass replaced, and this will not be possible for all listed buildings, particularly where glazing bars are very narrow. Whilst this approach is supported in principle by the Conservation and Design team, it has the potential to place a significant burden on officers and applicants to accurately assess individual panes of glass within proposals. This is a specialised task, the scale of which becomes clear when you consider a building could contain fifteen Georgian sash windows, each with 16 individual panes of glass that could easily have been individually repaired and replaced over a 300 year period. This is concerning at a time when the resources of local planning authorities are so stretched and this point is made clearly within our consultation response.
- 4.6 The guidance also includes a final section (p28) that provides a series of useful resources for LPA's in using the advice note in conjunction with the development of Local Plans, Conservation Area Appraisal, Neighbourhood Plans and other published guidance.
- 4.7 Officer responses to the consultation questions are set out in Appendix 1.

5.0 Proposed Council response

- 5.1 Members are asked to:
 - i. Note the contents of the consultation proposals, and
 - ii. Comment on and endorse the proposed Council response set out in Appendix 1. Any further comments received will be incorporated prior to the response being forwarded to Historic England.

6.0 Background documents

6.1 Climate Change and Historic Building Adaptation Historic England Advice Note:

<u>Guidance Open for Consultation | Historic England</u>