

## **Appendix 1: Principal Conservation and Design Officer response to HEAN consultation request**

Public Consultation: Climate Change and Historic Building Adaptation Historic England Advice Note 2023

### **1. Are you responding on behalf of an organisation (if so, which?), or in a personal capacity? (required)**

I am responding on behalf of Chichester District Council.

### **2. What is your role/interest in heritage and/or planning? (required)**

These are the views of the Council's Planning Committee following advice from the Principal Conservation and Design Officer and Development Managers at Chichester District Council

### **3. Does the draft Historic England Advice Note (HEAN) provide clear advice on the common types of proposals to adapt historic buildings to decarbonise and improve energy efficiency? In particular, certainty on when consents and permissions are required and what interventions are likely to be acceptable? (If not, what is needed to ensure it does?)**

The HEAN provides clear commentary on the most common types of proposals that the district council sees in applications and in requests for pre application advice.

Additional clarity is provided on a series of important modifications which will be useful in assisting officers with consistent and evidence based decision making.

The language used still provides scope for flexibility in decision making, for instance: "Listed building consent will **generally** not be required" and gives examples where a general rule may not be applicable.

**4. Does the draft HEAN provide clear advice to help local planning authorities determine applications relating to historic building adaptations to decarbonise and improve energy efficiency? (If not, what is needed to ensure it does?)**

For the same reasons as those given in answer to question 3 the HEAN largely achieves the above objectives.

There is one element however that requires further attention; In section 83 the acceptability of double glazing being inserted within historic window frames is noted as generally being acceptable, only on the basis that historic glass is not being removed to facilitate the new double glazing. Particularly in multi pane historic sash windows, historic glazing can survive in a very haphazard manner as it has been replaced piecemeal over time. A Georgian house could have multiple 8 over 8 sashes that would require inspection at the level of the individual pane, and no small level of expertise, to make an assessment of the potential for harm. Previous to the HEAN double glazing in this circumstance would generally have been resisted in principle.

Whilst it will remain the responsibility of applicants to accurately describe the likely impact of proposals on a heritage asset, which would include the analysis of historic glazing, it remains an onerous and specialised task that many applicants may struggle with. As such, it could routinely fall to officers to make the judgement.

The HEAN does therefore, perhaps unintentionally, place a much greater load of potential detailed analysis and decision making on local authority officers, than previously existed. This is concerning at a time when the resources of local planning authorities are so stretched.

Having said that, the advice itself in section 83 generally is welcomed in principal and supported in environmental and historic building terms.

**5. Does the draft HEAN provide clear advice to help local planning authorities deliver a positive strategy that encourages and supports opportunities for building adaptations that decarbonise and improve energy efficiency? (If not, what is needed to ensure it does?)**

The HEAN provides clear guidance that can be used both in the local plan, in future guidance notes, and in the formation of neighbourhood plans and conservation area appraisals.

**6. Is there any relevant advice missing from the HEAN?**

The most relevant topic areas that appear in planning applications and requests for pre application advice are covered by the advice note.

**7. Are there any improvements that could be made to the HEAN in terms of structure?**

Nearly a third of the HEAN is legislative and guidance preamble (up to page 11), which is certainly required to some degree but the actual guidance doesn't appear until later in the document as a result. It could be that a shorter section signposting readers to relevant information would be more concise and accessible to local planning authorities and developers using the document..

**8. Are there any improvements that could be made to the HEAN in terms of language and clarity/phrasing?**

The language is clear and provides room for flexibility in decision making.

**9. Do you have any other feedback or comments on the draft HEAN you would like to share?**

No further comments.