



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear Mr Lewis

FURTHER CONSULTATION ON PLANNING FOR CLIMATE CHANGE

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

The Institute welcomes the opportunity to comment on the consultation.

We wish to see the highest possible contribution made to climate change targets by historic assets that is compatible with their character, appearance and mode of construction. Our comments on the questions posed in the consultation are set out in Appendix A.

Yours sincerely

James Caird
Consultant Consultations Co-ordinator

APPENDIX A - CONSULTATION QUESTIONS

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PART 3.1 Climate responsive developments - consultation question

Q1	Do you consider these additions appropriate?	Yes	No
		Yes	
Comment: At 2.10.2 we suggest "minimising" instead of "reducing"			

PART 3.2 Sustainable building standards - Consultation Questions

Q2	Do you agree that Planning Policy Wales should set out a national development control policy requiring a minimum sustainable building standard?	Yes	No
		Yes	
Comment: At 3.2.2 a requirement for a "step-change" is indicated. It is not to us clear that the proposals at 2.10.4 represent such a change.			
Q3	Do you consider that the threshold of major developments an appropriate level to require a sustainable buildings standard?	Yes	No
			No
Comment: As many developments fall below the proposed threshold, the policy would not be very effective.			
Q4	Should this policy or a different level apply to <u>all</u> developments submitted after April 2009?	Yes	No
		Yes	
Comment: Developers will not adopt better practice unless they have to.			
Q5	Do you agree that the level sets using the CSH/BREEAM standard are appropriate and achievable for the majority of new developments in Wales?	Yes	No
Comment:			

Q6	Should planning conditions be used to secure the minimum standards as set out above?	Yes	No
		Yes	
Comment: But why set the standard so low? If speed of introduction is of concern, an announcement should be made now about progression to higher standards at (say) 2 year intervals.			

PART 3.3 Decentralised and renewable and low carbon sources - Consultation questions

Q7	Do you agree that the 10% requirement should be in addition to carbon emissions secured to meet the minimum standard under the Code for Sustainable Homes and/or BREEAM?	Yes	No
		Yes	
Comment: This follows similar moves in England.			

Q8	Do you agree that both on-site and near-site solutions should be used to secure local renewable and low carbon energy sources?	Yes	No
		Yes	
Comment: Care must be taken to ensure that near-site solutions are properly annexed to the scheme; but, where appropriate, due regard should also be given to the impact on, and the over riding principle of, protecting the character, setting and archaeological interest of historic assets.			

Q9	Should this policy apply or a different percentage apply to <u>all</u> developments submitted after April 2009?	Yes	No
		Yes	
Comment:			

Q11	Should there be other opportunities for developers to meet this requirement and reduce their carbon emissions further such as through offsetting the carbon emissions from their proposed development through financial contributions.	Yes	No
			No
Comment: Developers should be able to offset carbon emissions where they can demonstrate steps taken to lessen the inappropriate impact, and enhance the beneficial impact of the development on the character, setting and archaeological interest of historic assets. However, care must also be exercised to ensure that off-setting constitutes real reductions in carbon emissions			

PART 3.4 Local Development Plans - consultation questions

Q11	Do you agree with the approach for setting out, in a local development plan, higher standards and requirements for 'strategic sites'?	Yes	No
		Yes	
Comment:			

General questions that apply to all proposed changes			
Q12	Do you consider that the policy should allow for exceptions to meeting the minimum standard? And if so, what exceptions should apply?	Yes	No
		Yes	
Comment: When the proposals involve works to heritage assets which would be caused damage to fabric or setting by them			
Q13	Do you agree that April 2009 is an appropriate date for both policies to commence?	Yes	No
		Yes	
Comment:			
Q14	Do you consider that the combination of a sustainable building standard and a requirement for decentralised and renewable and low carbon energy sources provides an appropriate balance between energy efficiency, reducing carbon emissions and promoting the microgeneration industry in Wales?	Yes	No
		Yes	
Comment: But we would wish to see the standards for both set as high as feasible.			
Q15	Do you have any suggestions for content for the Technical Advice Note, specifically relating to the proposed amendments contained in this consultation?	Yes	No
			No
Comment:			
Q16	How should compliance with the sustainable building standard (para 2.10.4) and local renewable and low carbon sources percentage (para 2.10.6) be considered in the Design and Access Statement?		
Comment: They should form part of a Sustainability Assessment which should be undertaken as part of, or alongside, the DAS.			