



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

Susan Tipping
Communities and Local Government
Planning Resources and
Environment Policy
Zone 1/B1
Eland House
Bressenden Place
LONDON
SW1E 5DU

James Caird
Consultant Consultations Co-ordinator
IHBC Business Office
Jubilee House
High Street
Tisbury
Wiltshire
SP3 6HA

1 June 2010

Tel (01584) 876141
Web site www.ihbc.org.uk
E-mail consultations@ihbc.org.uk

Dear Ms Tipping

PLANNING FOR A LOW CARBON FUTURE IN A CHANGING CLIMATE

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.

Thank you for inviting us to participate in this consultation. The Institute is pleased to see that the draft PPS is building on its forerunner, the Climate Change supplement to PPS1, and we support much of it. We have some general points we should like to make and detailed comments on some of the policies.

1. Heritage assets and the retention of their embodied energy is of inherent value in suppressing carbon emissions. This is mentioned in Policy HE1.1 of PPS5 and we would like to see the same point made in this PPS perhaps, as suggested below, in Policy LCF3.
2. We are extremely concerned that the draft PPS appears to exclude conservation areas from any requirement to weigh climate change objectives against heritage objectives. Policy LCH4.1 requires policy to be formed which gives appropriate protection to "nationally recognized designations", including conservation areas (and with which we agree). In contrast Policy LDF13.4 permits refusal of planning permission only in the case of "national designations" from which conservation areas are excluded. On the other hand PPS5 does not distinguish between designated heritage and environment assets although Policy HE9 provides a new "exceptional" and wholly exceptional" hierarchy.

To be consistent with PPS5, we think this PPS should adopt this approach. It seems to us inappropriate that there might be no differentiation in climate change policy between ordinary places and conservation areas when LPAs have a statutory duty under s72 of

the Listed Buildings Act to give special attention to the desirability of preserving or enhancing the character or appearance of the conservation area in relation to any proposal.

We think Policy LCF13.4 should be more nuanced such that appropriate design to mitigate climate change is promoted in conservation areas but does not rule out refusals of permission where properly justified.

3. The Institute is concerned that the PPS may be paving the way for widespread programmes retrofitting external insulation to existing buildings. Whilst we accept the need for demanding Government carbon-saving targets, we must continue emphasize that the structural integrity of much of our built heritage (any many other traditionally constructed buildings) depends on the structures being able to breathe. Ill-considered roll-outs of insulation programmes could, therefore, result in increased rates of building failure. Leaving aside the townscape issues, this would be poor carbon management.

But the townscape issues are also paramount. Successive Governments have acknowledged that the quality of places is a major factor for people deciding where they want to live, work and spend their leisure time. Thus high quality places are also economically and socially successful ones. Referring back to our earlier point, conservation areas are part of the formula for recognizing and improving the quality of places. Their downgrading in the hierarchy of protection would have ramifications far beyond their appearance.

We think that planning policy should make this point and suggest Policies LCF4 and LCF13 as appropriate places.

4. Whilst all PPSs are supposed to be read together, and many of our concerns are covered in PPS5, the danger is that practitioners will only refer to the policies that developers draw to their attention. Adequate cross referencing is thus required. References to PPS5 HE1 and other policy are needed.

These are our comments on the policies in detail:

Policy LCF 1: Evidence base for plan-making

We generally support this policy in that it asks LPAs to ensure they have evidence of the possible impacts of climate change. But the draft PPS deals at length with interventions which might be used in mitigation. It seems to the Institute that LPAs should also procure evidence about the possible adverse impacts of climate change mitigation techniques and proposals. Some may be inappropriate in some areas (such as designated landscapes and historic areas) and LPA's LDF policy should be backed up with proper evidence to support any conclusions they may have come to.

We also think that the PPS should advise on the appropriateness of mitigation techniques and the circumstances for their use, perhaps by reference to other sources. It seems to us that the possibility of off-setting or mitigation should not be allowed to justify poor planning decisions.

Policy LCF 2: Regional planning approach

This policy requires policy that promotes locations for new development, strategies for mitigation of climate change and opportunities for renewables, setting targets for these. Whilst it advises that such strategies should not conflict with other policies and proposals, nationally recognized designations are not specifically mentioned. The Institute thinks they should be.

Policy LCF 3: Local planning approach for a low-carbon future in a changing climate

The Institute supports this policy, but would like to see an additional section:

"LCF3.2 Components of low-carbon economies and low-carbon living include:

- the retention of the embodied energy in buildings, infrastructure and artefacts;
- the reduction of energy use;
- the creation of sources of renewable energy.

Policy LCF 4: Local planning approach for renewable and low-carbon energy and associated infrastructure

The Institute considers paragraph ii(a) to be too sweeping in its wording. Many traditional buildings are vulnerable to complete structural failure if subjected to inappropriate supposed energy-saving interventions. Thus this policy could result in unnecessary loss of real estate (and its embodied energy) as well as the disfigurement of cherished townscape. There may be very good reasons for precluding specific technologies, such as the external cladding issue we have already referred to. We think this policy should be worded:

ii(a) "...not preclude the use of specific technologies without a clear technical justification. ... (d) ensure that the embodied energy in the existing building stock is not jeopardized by inappropriate energy-saving interventions." This would allow individual cases to be argued at LDF examinations.

Policy LCF 5: Local planning approach for adapting to a changing climate

This policy deals with new development. Care needs to be taken that any mitigation or off-setting measures that may be under consideration do not adversely affect heritage assets off-site. We suggest:

"v. ensure that any off-site mitigation measures have no adverse impacts."

Policy LCF 6: Local planning approach for selecting sites for new development

This is about the location of new development. The stated policy includes locations that help existing communities to adapt to climate change although it doesn't promote building on already sustainable settlements such as historic towns. We believe this should be added.

Policy LCF 7: Local planning approach to setting requirements for using decentralised energy in new development

This policy formalizes "Merton Rule" arrangements. There is nothing about assessing the potential impacts of specific local energy generation methods as part of policy development (apart from in National Parks). The Institute thinks there should be. We suggest:

"LCF7.1 ...iv. have due regard to any potential impacts and ways of overcoming them satisfactorily."

Policy LCF 8: Local planning approach to setting authority-wide targets for using decentralised energy in new development

The Institute has no objection to this policy.

Policy LCF 9: Local planning approach to setting requirements for sustainable buildings

The Institute supports the adoption of nationally recognized standards (such as CSH) not locally devised ones as makes for better overall clarity of policy.

Policy LCF 10: Local planning approach for electric and plug-in hybrid vehicles

The Institute has no objection to this policy.

Policy LCF 11: Testing local planning requirements

This policy needs to be clarified to make it clear that it does not refer to the local adoption of national policy.

Development management policies

Policy LCF 12: General approach

The Institute has no objection to this policy.

Policy LCF 13: Designing for a low carbon future in a changing climate

In line with the Institute's comments on Policy LCF5 we suggest a small addition:

"LCF13.2 vi. be designed to avoid adding to the vulnerability of existing or other proposed development to impacts arising from changes in the climate [insert: or other mitigation measures]; and... "

In line with our comments in paragraphs 2 and 3 at the beginning of this response, the Institute objects to the wording of Policy LCF13.4. We think the limitation of refusal of planning permission for climate change proposals and mitigation as a last resort to nationally designated heritage only is inappropriate, as LPAs have statutory duties to give special attention to the desirability of preserving heritage assets. We can see no reason for this specific limitation as without it the assessment of proposals would still have to pass the weight test in relation to the weight to be given to climate change adaptation elsewhere in the paragraph, and which can be done while complying with the statutory duties. We ask that the words "...the concern relates to a heritage asset protected by an international or national designation and..." are removed and that the need for proper assessment of material harm reinforced if considered necessary.

This particularly applies to the appropriate treatment of traditionally constructed buildings referred to earlier, and we suggest an added paragraph:

after vi. "...where there are works to traditionally constructed buildings, be designed to improve the performance of the building whilst not undermining its original constructional principles such airborne moisture dispersal."...

Policy LCF 14: Renewable and low carbon energy generation

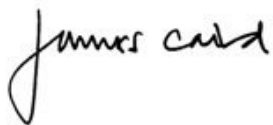
The Institute thinks the historic environment merits specific mention in this policy.

"LCF14.2 ... i. expect applicants to have taken appropriate steps to mitigate any adverse impacts through careful consideration of location, scale, design and other measures, including through ensuring all reasonable steps have been taken, and will be taken, to minimise noise impacts [insert ...and impacts on the historic environment...]."

Policy LCF 15: Safeguarding renewable and low carbon energy supplies

The Institute has no objection to this policy.

Yours sincerely

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large initial 'J'.

James Caird
Consultant Consultations Co-ordinator