

Consultation comments on policy HE14 - improvements or alterations to improve the energy efficiency of designated and non-designated historic assets

- Support - 14
- Neither support of object - 3
- Object - 2

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

Comments in support of policy HE14 - improvements or alterations to improve the energy efficiency of designated and non-designated historic assets		
Respondent number	Comment	Officer comment
ANON-KSAR-N8YF-P	This policy should be encouraged within the South Downs National Park area too if not already	<p>Comments noted</p> <p>SDNP produce their own Local Plan, we have no jurisdiction over policies for the National Park</p> <p>Recommended response: no change</p>
ANON-KSAR-NKXV-R	Strongly support.	<p>Support welcomed</p> <p>Recommended response: no change</p>
ANON-KSAR-N8MP-M	[This response should be read in conjunction with the full copies of the 'North Whiteley Representations to the Winchester Local Plan Regulation 18 representations OBO Crest Nicholson' representations which includes the relevant figures and appendices, with tables correctly formatted]	<p>Comments noted</p> <p>Recommended response: no change</p>

	<p>Paragraph 189 of the Framework seeks to conserve and enhance the historic environment and sets out that heritage assets are an irreplaceable resource that should be conserved so they can be enjoyed for their contribution to the quality of life or existing and future generations. Winchester has a rich and diverse historic environment that provides a valuable contribution to its identity and culture. Strategic Policy HE1 confirms the Plan will protect the district's designated and non-designated heritage assets in accordance with the Framework and Policies HE2-HE14 set out the approach through which this will be achieved.</p> <p>Crest Nicholson is broadly supportive of the aims of these Policies and notes the development proposal for land in the North Whiteley MDA is not located in close proximity to any designated or non-designated heritage assets and the allocation of further growth in this location will therefore reduce development pressure on the district's historic environment.</p>	
BHLF-KSAR-N8BD-W	<p>HE14 - Improvements or alterations to improve the energy efficiency of designated and non-designated historic assets</p> <p>Support</p> <p>The Trust supports Policy HE14 as a sensible connection between the need for more energy efficient infrastructure and the need to protect the historic environment.</p>	<p>Support welcomed</p> <p>Recommended response: no change</p>

Comments which neither support nor object to policy HE14 - improvements or alterations to improve the energy efficiency of designated and non-designated historic assets		
Respondent number	Comment	Officer comment

<p>BHLF- KSAR- N8BQ-A Historic England Link here</p>	<p>Para 8.56 - comment Minor wording changes to improve clarity Full doc in SP for mark ups It is important that care should be taken to ensure that such proposals do not adversely affect buried archaeological remains and suggest consultation with the Winchester City Council archaeologist may be needed.</p> <p>Policy HE14 - comment We suggest minor wording changes to improve alignment with the terminology in the NPPF.</p> <p>Changes to policy text outlined below: Any improvements or alternations that are designed to improve the energy efficiency of designated and non-designated historic assets will be supported providing that it can be clearly demonstrated that:</p> <p>i. That it is The proposals represent an appropriate strategy for the individual historic building, based on an appropriate assessment and they meet the requirements of the NPPF in terms of assessing the significance of harm to the historic heritage asset; and</p> <p>ii. That a Any proposals which harm the structural integrity, character or significance of the architectural or historic interest of the building including through its setting, are clearly outweighed by public benefits as set out in Policy HE3 on designated heritage assets and Policy HE4 on non-designated heritage assets.</p> <p>Change to supporting text: Para 8.56 – comment Minor change to last sentence in para It is important that care should be taken to ensure that such proposals do not adversely affect buried archaeological remains and suggest</p>	<p>Comments noted and welcomed</p> <p>Agree to suggested changes and policy altered accordingly to wording of policy which can be seen here:</p> <p>New text = bold Removed text = strikethrough</p>
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	<p>consultation with the Winchester City Council archaeologist may be needed.</p> <p>Para 8.59 new text: Historic buildings have an unavoidable role to play in reducing our carbon emissions, as part of our journey to become a net Carbon Zero district by 2030. Historic buildings can be warm, comfortable and healthy places to work, live and play. Their energy efficiency performance is often better than predicted, but there are many works to historic buildings which can be carried out to make them more sustainable. Some historic buildings can be protected as Listed Buildings, or by inclusion in a Conservation Area. This might mean that additional permissions are needed before these works are carried out. The Council has produced a guide for owners and occupants of historic buildings, to help them to make their historic buildings more efficient. This guide sets out what types of work can be done, when they need permission, the application requirements, and the general likelihood of receiving permission. The guide is available here: https://www.winchester.gov.uk/historic-environment/historic-buildings-and-energy-efficiency. It does not set out how to do the works, or which approach is best, but advises on the permissions needed and the way in which to apply for them.</p>	
<p>BHLF- KSAR- N8BX-H</p>	<p>The Historic Environment Strategic Policy HE1 HE2 HE8 HE9 HE14 The Trust supports the aspiration for a ‘positive Policy’ when dealing with heritage assets, but subject to such Policy recognising that such assets must ‘make a practical contribution’ by delivering a meaningful use. (As stated at 8.19). The Trust operates from several listed buildings and/or</p>	<p>Comments noted</p> <p>WCC is committed to support HHFT in their effective use of the historic buildings within their estate. These policies are not intended to preclude this, rather to ensure that all works and alterations to</p>

	<p>buildings of historic interest. The Trust is concerned that the need to upgrade such buildings (to allow them a meaningful future and retain historic context) with modernised or High Tec infrastructure reflecting clinical or supporting need should not be seen as inappropriate or made unaffordable by the needs of historic conservation. The Trust suggests that certain historic and socially important continuous building uses be considered ‘flexible and adaptable’ as a route to maintaining ongoing historical context, allowing sustainable meaningful use and to protect and build upon already embedded carbon. The Trust expects that ‘sustainable future use’ must also allow alteration reflecting a contribution to the stated climate emergency and to achieve desired energy efficiency / Net Carbon Zero aspirations. (CN1 CN2 CN6),</p>	<p>them are carefully considered to ensure that the significance is sustained, and that any harm is thoroughly justified and minimised where possible. WCC recognises the contribution made by the reuse of buildings, historic or otherwise, to protect embodied carbon in the journey to net-zero.</p> <p>Recommended response: no change</p>
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Comments which object to policy HE14 - improvements or alterations to improve the energy efficiency of designated and non-designated historic assets		
Respondent number	Comment	Officer comment
ANON-KSAR-NKZ5-S	<p>In the face of the climate, biodiversity and energy crises, the relaxation of planning constraints for maintenance/upgrading of historic buildings is required. Otherwise, carbon and biodiversity mitigation and affordable running costs for such buildings will not be achieved to de-risk these buildings falling into disrepair with unnecessary impacts on the climate and biodiversity crises. This would be contrary to overall ethos to support historic buildings being kept in use rather than allowed to fall into disuse.</p> <p>Importantly, architecturally constrained buildings emit more carbon than typical typical buildings. For homes, this is a quarter of all</p>	<p>Comments noted</p> <p>It is important that the Local Plan is read as a whole as the section covered in this rep such as climate change and biodiversity have their own topics with their own policies covering this more specifically.</p> <p>Recommended response: no change</p>

	<p>buildings that contribute a disproportionate of carbon emissions - more than 5% of total UK emissions. Conservation Area Toolkit Architects Climate Action Network (architectscan.org)</p>	
<p>ANON- KSAR- NKFD-M</p>	<p>The prohibition on installation of double glazing in Grade 2 listed properties should be challenged. Modern double glazing can be designed in ways that do not impact on the integrity of a historic building in the way that uPVC conversions used to do. The local plan should address this directly.</p>	<p>Comments noted</p> <p>We are supportive of measurement to improve energy efficiency to historic buildings.</p> <p>Each case is specific and has to be looked at on an individual basis. There is no outright prohibition of double-glazing on Grade II listed properties. However, consent will be required for replacement of windows including double glazing.</p> <p>More information on Alterations and Repairs to listed buildings can be found in this document: What work requires Listed Building Consent? Which can be found at the following link on the WCC website: https://www.winchester.gov.uk/assets/attach/27502/Listed-Buildings-Repairs-and-Alterations.pdf</p> <p>Recommended response: no change</p>

	Recommendations	Officer response
Comments from SA/HRA	No recommendations provided	N/A

Amendments to supporting text

Para 8.56 – comment

Minor change to last sentence in para

It is important that care should be taken to ensure that such proposals do not adversely affect buried archaeological remains and suggest-consultation with the Winchester City Council archaeologist **may be needed**.

Para 8.59 new text:

Historic buildings have an unavoidable role to play in reducing our carbon emissions, as part of our journey to become a net Carbon Zero district by 2030. Historic buildings can be warm, comfortable and healthy places to work, live and play. Their energy efficiency performance is often better than predicted, but there are many works to historic buildings which can be carried out to make them more sustainable.

Some historic buildings can be protected as Listed Buildings, or by inclusion in a Conservation Area. This might mean that additional permissions are needed before these works are carried out. The Council has produced a guide for owners and occupants of historic buildings, to help them to make their historic buildings more efficient. This guide sets out what types of work can be done, when they need permission, the application requirements, and the general likelihood of receiving permission.

The guide is available here: <https://www.winchester.gov.uk/historic-environment/historic-buildings-and-energy-efficiency>. It does not set out how to do the works, or which approach is best, but advises on the permissions needed and the way in which to apply for them.

Amendments to policy HE14

Any improvements or alternations that are designed to improve the energy efficiency of designated and non-designated historic assets will be supported providing that it can be clearly demonstrated **that**:

- i. ~~That it is~~ **The proposals represent** an appropriate strategy for the individual historic building, based on an appropriate assessment and they meet the requirements of the NPPF in terms of assessing the significance of harm to the ~~historic~~ **heritage** asset; and
- ii. ~~That a~~ Any proposals which harm the structural integrity, character or significance of ~~the architectural or historic interest of the~~ building including through its setting, are clearly outweighed by public benefits as set out in Policy HE3 on designated heritage assets and Policy HE4 on non-designated heritage assets.