**PARISH COUNCIL MEETING 29th November 2021 AGENDA ITEM 11. Appendix L**



Dear  Alison Phurnock (Conservation Officer)

While the Corscombe, Halstock and District Parish Council  appreciate the importance of maintaining our listed buildings, where the alterations requested are deemed "less than substantial harm" we feel the request should be weighed very carefully against public benefit.

The Corscombe, Halstock and District Parish Council  would like to ask that when considering a planning application for a listed building, the Dorset Council conservation officer should seriously consider public benefit including environmental considerations such as global warming, fuel costs and sustainability which we as a community feel are all very important.

The Corscombe, Halstock and District Parish Council regard measures to address energy waste and global warming as a significant public good and that this should be a fundamental consideration of all planning applications including those affecting listed buildings where it is deemed to be “less than substantial harm”.

Within the UK there are around 500,000 listed buildings (1), in West Dorset alone, there are around 6,500 (2). It has been estimated that improvements to listed buildings in England and Wales could save up to 3 MtCO2 of carbon per annum, a saving equivalent to 12% of UK’s Sixth Carbon Budget[[1]](#footnote-1).

(Paragraph 202) The National Planning Policy Framework (2021) states that  where a proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal including securing its optimum viable use.

Dorset Council has also declared a Climate Emergency which is supported by our parish council.

Many thanks

Miss Tessa Safadi

Corscombe, Halstock and District Parish Council Clerk

01935 891068

[CHDPC.org.uk](http://CHDPC.org.uk)

References:

1. Heritage and Carbon: How historic buildings can help tackle the climate crisis. C Zeidler, M Hari, and M Bell for the Grosvenor Trust. 2021.
2. <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning/planning-constraints/listed-buildings/listed-buildings-in-west-dorset-and-weymouth-and-portland>
3. Heritage and Carbon: How historic buildings can help tackle the climate crisis. C Zeidler, M Hari, and M Bell for the Grosvenor Trust. 2021.

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| James Weir <James.Weir@dorsetcouncil.gov.uk> |

 | Fri, 8 Oct, 11:02 |  |  |
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| to me, Alison |

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Dear Miss Safadi,

Thank you for your recent letter to Alison Turnock in which you discuss the considerations of ‘public benefits’ where less than substantial harm to designated heritage assets arises from proposals intended to address energy efficiency or renewable energy generation. Dorset Council certainly takes these concerns seriously, as is reflected by our recent adoption of the Climate and Ecological Emergency Strategy and I have been asked to reply on behalf of the Conservation Team.

I thought it might be useful to outline the context into which historic buildings fit. There are approximately 25,000,000 buildings in England and Wales (domestic and non-domestic). Of these, about 500,000 (2%) are listed. Given this substantial minority, there has been no reason for central government or others to conclude that buildings of special architectural and historic interest should cease to be treated as such, and so there has been no amendment to the Act (see below) nor to national planning policy to suggest otherwise, even in the face of climate change.

We have a statutory duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 (s.16, 66) to have “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”. An equal duty exists for Conservation Areas (s. 72). This duty is carried downwards into the requirements of the National Planning Policy Framework and Local Plan policy, which mutually require that impacts of proposals on the significance of listed buildings (and other designated heritage assets, such as Conservation Areas) be objectively assessed.

Where this results in harm, there are various tests which have to be met in order for the harm to be permitted. The most common is that there must be public benefits which are sufficiently substantial to outweigh the harm caused, taking into account that ‘special regard’ (i.e. the ‘great weight’ in planning policy) to be given to protecting what is special about these buildings. Where harm occurs through, say, the installation of solar panels, the issue therefore tends to be that adding solar panels to one building rarely qualifies as being a public benefit of sufficient substance, though of course it is generally beneficial to wider national and global aims. However, this does not mean that such changes are prohibited full-stop, but rather that they must be assessed in an objective way according to the proprietary elements which make a building or area ‘special’ so that change is managed in a measured and appropriate way.

Applying energy efficient improvements to historic buildings is an incredibly complex and technical issue, the full extent of which has only in recent years begun to be tackled and understood. Some issues can be briefly summarised:

* traditionally constructed buildings (e.g. those with solid walls and breathable surfaces) historically operated in a far more sustainable equilibrium with the outside atmosphere than modern building construction, which requires a significant amount of energy to create the necessary spaces and equipment for an internal environment to be sealed and encapsulated from the outside;

* in my experience, most energy-related issues arising with traditionally constructed buildings are the result of:

* + poor changes which have disturbed this equilibrium, e.g. sealing internal environment with double-glazing or applying impervious and impermeable renders, which result in building defects (e.g. condensation and damp) which then result in greater energy expenditure to compensate or, worse, attempt to rectify with inappropriate interventions; or

* + lack of regular maintenance, which results in, for example, timber windows warping and allowing draughts or gutters leaking and creating damp issues;

* recent research by Historic England has identified that traditionally constructed buildings (*c*. 20% of the entire building stock) are significant repositories of ‘embodied carbon’ which is only now beginning to be understood and is therefore rarely factored into generalised considerations of energy usage;

* recent research by HE and SPAB has identified that the thermal performance of traditionally constructed buildings is generally underestimated by the current standardised technology used to assess it, which is calibrated for modern construction materials and methods.

With these issues in mind, it is becoming increasingly clear that the best way to improve energy efficiency in traditional buildings revolves around understanding these issues, i.e. by taking what Historic England refer to as a ‘whole building’ approach, and to ensure that energy efficiency measures are in-keeping with the way the building has been constructed and enable it to be conserved for future generations.

There is a wealth of freely available guidance on these matters, some of which I have provided below and can be downloaded from the relevant websites. If you wish me to direct you to the Historic England or SPAB research projects, then please do let me know and I can provide the relevant links.

* Historic England, Energy Efficiency and Traditional Homes (2020)
* Historic England, Energy Efficiency and Historic Buildings: How To Improve Energy Efficiency (2018)
* Sustainable Traditional Buildings Alliance (STBA), Planning Responsible Retrofit of Traditional Buildings (2015)
* Society for the Protection of Ancient Buildings (SPAB), Briefing: Energy Efficiency (2014)

I do hope that the above satisfactorily answers your queries, but please do not hesitate to contact me, if you need any further information,.

Kind regards,

James

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1. [↑](#footnote-ref-1)