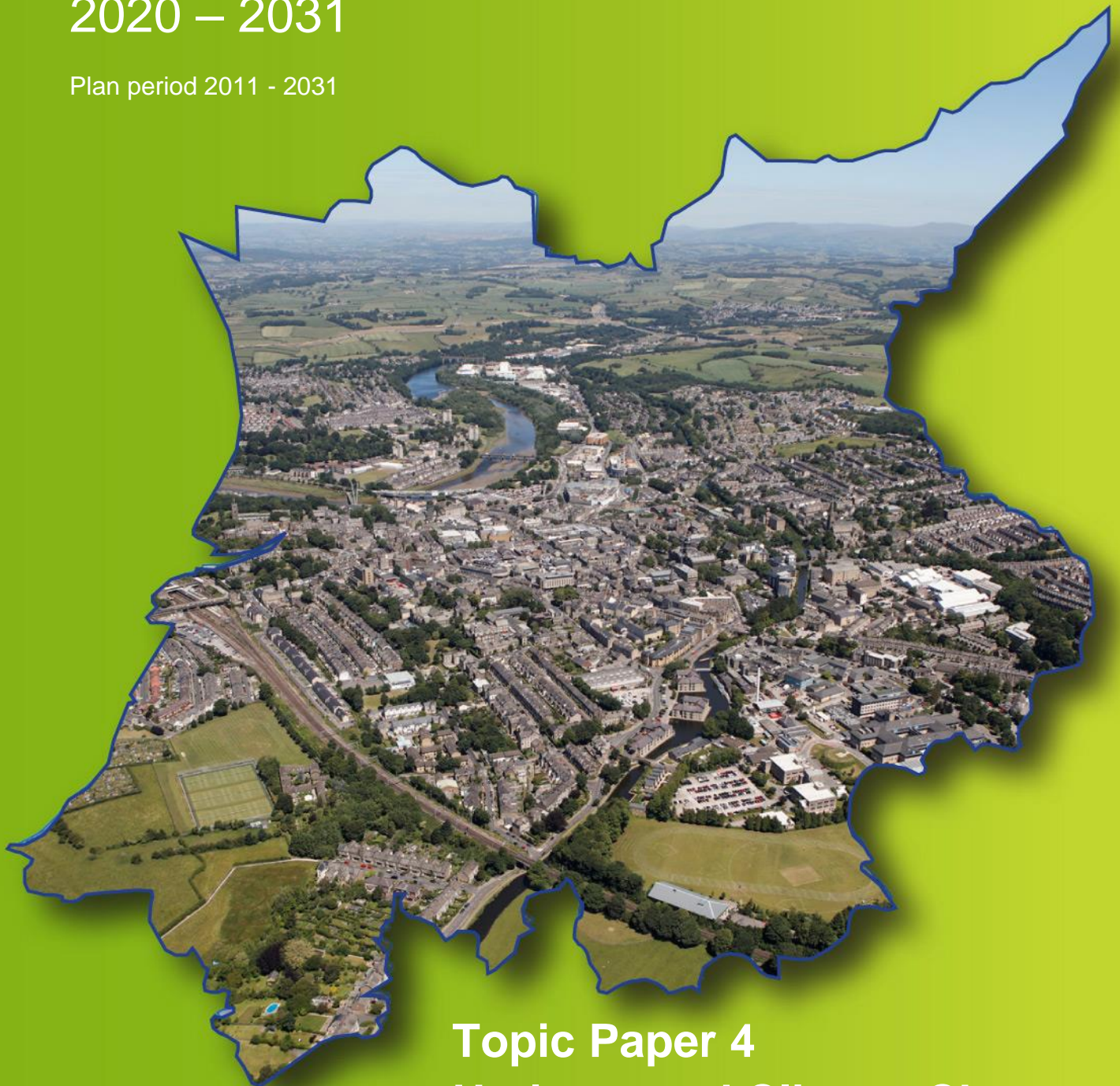


A Local Plan for

Lancaster District

2020 – 2031

Plan period 2011 - 2031



Topic Paper 4 Heritage and Climate Change Consideration of Alternative Policy Approaches [May 2021]

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1.0 Introduction

This document sets out what alternative options have been considered in the Climate Emergency Local Plan Review (CELPR).

Outcomes of the Scoping consultation (Sept-Nov 2020)

During the consultation, the only reference made to heritage matters was made by the Canal and Rivers Trust, who highlighted that the canal offers opportunities for walking and cycling in an environment rich in heritage.

It is the City Council's belief that heritage matters in relation to climate change need significant attention and therefore a background paper, 'Heritage and carbon zero' has been produced to focus on these matters in greater detail. This will be available for comment during the Regulation 18 consultation alongside the DPD's.

How do the policies in this topic paper ensure better outcomes in relation to Climate Change?

Heritage conservation is an inherently sustainable activity. The ongoing maintenance and re-use of our historic environment supports the task of achieving carbon zero. Every year a huge amount of energy is expended in material extraction, construction, operation, maintenance, repair and demolition. Retaining and re-using historic buildings enables us to meet our needs outside of this, often, wasteful cycle of energy use.

Historic buildings have been constructed and adapted over many centuries using traditional materials and techniques that have withstood the test of time. However, many of the common standards for retrofitting buildings are not compatible with these, and are harmful to historic building fabric, occupant health and heritage value. For this reason, sensitivity and understanding have to inform any changes we choose to make.

The proposed new policies will encourage adaptation and mitigation measures which will improve thermal efficiency of buildings and reduce energy usage while minimising the risk of harm.

2.0 Policies relating to Heritage and climate change

There are existing policies in the adopted Local Plan that relate to heritage, however it as not proposed in the scoping Consultation that these be included in the list of 32 policies proposed for amendment as LCC do not consider that these should be amended. Work on the background paper however has highlighted that new policies may be beneficial. The proposed new policies are set out below, with their associated supporting text.

A discussion of the alternative policies and policy detail is considered is given for each, including information on the SA/SEA/HRA work that is being undertaken as well as how the policies ensure better outcomes in relation to climate change.

Proposed Planning Policies

POLICY CCH1: RETROFIT OF BUILDINGS OF TRADITIONAL CONSTRUCTION FOR ENERGY EFFICIENCY

The Council will support the responsible retrofitting of energy efficiency measures and appropriate use of micro-renewables in historic buildings of traditional solid-walled construction.

Proposals will be supported where they:

- I. Demonstrate that they are consistent with the energy hierarchy – firstly reducing energy demand in the building, secondly increasing energy efficiency, and finally looking to generate renewable energy;**
- II. Avoid compromising permeability, ventilation or structural stability**
- III. Avoid harm to the heritage significance of the building.**

Supporting text

Many buildings in the district are of traditional construction, with solid masonry walls and no integrated moisture barriers. A large proportion of these buildings are heritage assets. Such buildings are designed to perform differently to modern buildings of cavity wall construction. While modern buildings depend on barriers which ensure that the structure is watertight, traditional solid walled buildings cyclically absorb and release moisture through their fabric. This process depends on maintaining an equilibrium

of heating and ventilation, which can be easily upset by changes to the building.

Responsible Retrofit is a holistic approach to retrofit in which all interacting factors across the whole building are considered, and risks and benefits are balanced. In practice, this means considering how fabric measures such as insulation, draught proofing, glazing and rainwater protection; services such as ventilation, heating and renewable energy; and occupant behaviours interact with one another, and what effect they have both individually and cumulatively. For example, where one change to the building might have benefits in terms of energy usage, this might also be outweighed by risks to heritage significance or building fabric and environment. Retrofit measures may be safely introduced individually, but a combination of several may have a harmful effect. The biggest risk in introducing retrofit measures is their effect on building permeability and ventilation: inadequate permeability or ventilation poses a risk to both historic building fabric and occupant health.

Proposals must take into account the relative benefits and risks to the climate, health of building users, and heritage significance. The SBTA *Responsible Retrofit Guidance Wheel* may assist applicants in making such assessments.¹ Decisions related to retrofit will be made on an individual basis according to the specific requirements of each building.

A comprehensive understanding of the significance of heritage assets will underpin decision making, with reference made to the degree, nature and extent of significance. There will be cases where measures cannot be accommodated without resulting in a high level of harm to heritage significance. However, with positive engagement between applicants and the Council, and where proposals are supported by creativity of design, a good understanding of traditional construction, and, where appropriate, expert advice, solutions can often be reached. In some cases where proposals do not satisfy the requirements of this policy it may be possible to instead consider proposals for micro-renewables under policy CCH2.

Proposals should demonstrate that they are consistent with the energy hierarchy, as described in Policy DM30a.

Policy CCH1: What alternative approaches were considered?

¹ <http://responsible-retrofit.org/wheel/>

As building owners in the Lancaster district seek to improve energy efficiency in light of the climate emergency, we are likely to see an increasing number of proposals for retrofit measures in existing buildings. A large proportion of the district's existing buildings were constructed prior to 1919, and many of these are of heritage value. For reasons set out above, retrofit measures which may be appropriate in modern cavity-walled buildings are not always appropriate for such buildings. It is therefore necessary to introduce a new policy which directly addresses retrofit of this type of building in order to minimise harm and maximise benefit. While Policy DM37 already addresses retrofit measures in relation to Listed Buildings, the risks associated with introducing inappropriate retrofit measures, either individually or cumulatively, apply to all solid-walled buildings equally.

The introduction of this policy follows best practice guidance issued by Historic England and the Sustainable Traditional Buildings Alliance.

An alternative option considered was not to include this new policy, and instead to amend the existing section of Policy DM37. This approach was not pursued further as it became clear following background research that a clearly defined and separate policy would be the best way to address the complex nature of retrofit in traditional buildings.

How does this policy ensure better outcomes in relation to Climate Change?

Responsible Retrofit of existing buildings will allow the district to progress towards carbon neutrality while continuing to reap the benefits of its diverse heritage. The policy will enable adaptation and mitigation measures to be introduced to traditional buildings which will result in improved thermal efficiency and reduce household energy usage, while reducing the risk of harm associated with these measures. The policy encourages a 'Whole Building' approach, which will result in outcomes which are sustainable in the long term.

SA/SEA/HRA considerations (completed by consultants AECOM):

Alternatives in the context of SA/SEA need to be strategic in nature, meaningful and deliverable. Procedural choices such as 'amending the existing heritage policy' are not necessary to test in the SEA.

With regards to meaningful choices in relation to 'heritage', no reasonable alternatives have been identified at this stage for this SA Topic. Instead, the SA process has been utilised to provide a broad commentary on the policy amendments and make further recommendations for enhancement where appropriate.

Suggested changes by Lancaster City Council	SA topics likely to be affected	Delivery / potential conflicts	City Council Response
<i>Policy in support of energy efficiency measures and certain renewables in solid-walled historic buildings.</i>	Lowering carbon emissions ? Historic Environment ?	The retrofitting process and stages may include activities which lead to the damage of historic assets internally or externally. For example the use of heavy machinery or deconstruction and reconstructing of elements of historic buildings.	Comments noted. Additional changes are not considered necessary with heritage assets protected by other policies within the Development Plan.

Further recommendations	SA topics likely to benefit	Delivery and potential conflicts	City Council Comments
<i>Add wording to strengthen links with policy CCH2 and encourage solutions where physical changes to sensitive parts of listed buildings cannot be altered. For example, support for the use of low carbon measures in historic buildings 'and their curtilages'.</i>	Lowering carbon emissions +ve	No issues likely.	Minor changes to the policy to strengthen links to CCH2 can be included. However the policy deals primarily with retrofit measures (e.g. insulation, replacement windows) rather than microrenewables

HRA Screening

Policy Number	Policy Title and Description	Implications on climate Change	Suggested Changes by LCC	Screening Outcome	City Council Comments
CCH1	Retrofit of Buildings of Traditional Construction for Energy Efficiency The Council will seek to encourage the	Responsible Retrofit of existing buildings will allow the district to progress towards carbon	Policy in support of energy efficiency measures and certain renewables in solid-walled	No Likely Significant Effect. Screened out. This policy is associated with improving the energy	Comments noted.

Policy Number	Policy Title and Description	Implications on climate Change	Suggested Changes by LCC	Screening Outcome	City Council Comments
	responsible retrofitting of energy efficiency measures and appropriate use of micro-renewables in historic buildings of traditional solid-walled construction.	<p>neutrality while continuing to reap the benefits of its diverse heritage. The policy will enable adaptation and mitigation measures to be introduced to traditional buildings which will result in improved thermal efficiency and reduce household energy usage, while reducing the risk of harm associated with these measures. The policy encourages a 'Whole Building' approach, which will result in outcomes which are sustainable in the long term.</p>	historic buildings	efficiency of historic buildings. This is a statement of intent and aspiration. The addition of the suggested changes to this policy is not expected to have any implications on European sites	
		Further recommendations	Add wording to strengthen links with policy CCH2 and encourage solutions where physical changes to sensitive parts of listed		Amendments incorporated into policy supporting text.

Policy Number	Policy Title and Description	Implications on climate Change	Suggested Changes by LCC	Screening Outcome	City Council Comments
			buildings cannot be altered. For example, support for the use of low carbon measures in historic buildings 'and their curtilages'.		

POLICY CCH2: MICRO-RENEWABLES IN THE SETTING OF HERITAGE ASSETS

Proposals for new micro-renewable systems in the setting of Heritage Assets will be supported where they:

- I. Demonstrate they are consistent with the energy hierarchy – firstly reducing energy demand in the building, secondly increasing energy efficiency, and finally looking to generate renewable energy
- II. Avoid harm to the significance of the asset via its setting, or where harm can be appropriately mitigated
- III. Assess the potential for below ground archaeology where proposals would require breaking ground or cause vibrations, and appropriately avoid or mitigate any harm

Supporting text

In some cases it will be possible to install micro-renewables such as photovoltaic panels or wind generators within the setting of a heritage asset, or on an outbuilding, rather than on the heritage asset itself in order to reap some of the benefits of these systems while avoiding some of the harm to the asset's significance. The decision to do so must be informed by an assessment of the contribution the asset's setting and outbuilding(s) make to its significance; outbuildings may also be curtilage listed or they may be non-designated heritage assets in their own right. Where assets are clustered, such as in Conservation Areas, the setting of surrounding heritage assets and the potential impact on the historic character of the area should also be considered.

Where harm to the significance of a heritage asset would be caused by the proposals, appropriate

mitigation will be required. This might include screening the installation from view.

Proposals should demonstrate that they are consistent with the energy hierarchy, as described in Policy DM30a.

This policy is intended to support Policy DM39 (The Setting of Designated Heritage Assets) in dealing with the specific challenges posed by the installation of micro-renewable systems in the setting of a heritage asset. Proposals are expected to be supported by a heritage impact assessment as required by Policy DM39.

Policy CCH2 What alternative approaches were considered?

An increasing number of proposals concern the installation of micro-renewable systems (such as photovoltaic panels) directly on or inside Listed Buildings and NDHAs. In many cases, these systems cannot be accommodated without resulting in a high level of harm to the building's significance. Background research revealed that as an alternative, systems can often be installed in the vicinity of a building without compromising their functionality – this offers an opportunity to substantially reduce the potential harm such systems might cause to heritage significance. For this reason, a new policy is proposed which specifically addresses this approach in order to offer an alternative where more direct installations are not feasible.

An alternative approach to the introduction of a new policy would have been to amend the existing policy DM39 to include additional text relating to micro-renewables. It was considered that this approach would be to the detriment of the clarity of the existing policy.

How does this policy ensure better outcomes in relation to Climate Change

The policy provides for instances where micro-renewable systems cannot be accommodated directly on a heritage asset without resulting in a high level of harm, and would therefore conflict with existing local and national policy and legislation. The policy will provide guidance which would enable renewable energy generation on a household scale while minimising the associated risks to heritage value.

SA/SEA/HRA considerations (completed by consultants AECOM):

Alternatives in the context of SA/SEA need to be strategic in nature, meaningful and deliverable. Procedural choices such as 'amending the existing heritage policy' are not necessary to test in the SEA.

With regards to meaningful choices in relation to ‘heritage’, no reasonable alternatives have been identified at this stage for this SA Topic. Instead, the SA process has been utilised to provide a broad commentary on the policy amendments and make further recommendations for enhancement where appropriate.

Suggested changes by Lancaster City Council	SA topics likely to be affected	Delivery / potential conflicts	City Council Comments
<i>New policy which provides support for micro-renewables within the setting of curtilage of heritage assets, to support Policy DM39.</i>	Lowering carbon emissions ? Historic Environment +ve	Whilst there is support for micro renewables, this is secondary to the protection of the setting of heritage assets. Harm is open to interpretation and micro generation schemes could therefore be held back.	Comments noted but no action to be taken. ‘Harm’ is part of existing national policy.

Further recommendations	SA topics likely to be affected	Delivery and potential conflicts	City Council Comments
<i>Wording could include reference to screening/mitigation to reduce potential effects relating to effects upon the landscape surrounding the setting or curtilage of the historic asset/renewable scheme.</i>	Landscape +ve	Could place further ‘restrictions’ upon micro generation schemes.	Comments noted. This is already part of the policy and can be strengthened with minor changes to wording.
<i>Where heritage assets are commonly clustered, the wording could be expanded to include ‘assessment of the contribution the setting and/or curtilage make to the significance of the asset, surrounding heritage assets and the general historic character of the area’</i>	Historic Environment +ve Lowering carbon emissions -ve?	Could place further ‘restrictions’ upon micro generation schemes.	The policy can be amended to accommodate this suggestion.

HRA Screening

Policy Number	Policy Title and Description	Implications on climate Change	Suggested Changes by LCC	Screening Outcome	City Council Comments
Policy CCH2	<p>Micro-renewables in the Setting or Curtilage of Heritage Assets Proposals for new micro-renewable systems in the setting or curtilage of Heritage Assets should be supported by an assessment of the contribution the setting and/or curtilage make to the significance of the asset. Proposals will be encouraged where they avoid harm to the significance of the asset, or where harm can be appropriately mitigated. The potential for below ground archaeology should also be assessed where proposals would require breaking ground or cause vibrations.</p>	<p>The policy provides for instances where micro-renewable systems cannot be accommodated directly on a heritage asset without resulting in a high level of harm and would therefore conflict with existing local and national policy and legislation. The policy will provide guidance which would enable renewable energy generation on a household scale while minimising the associated risks to heritage value.</p>	<p>New policy which provides support for micro-renewables within the setting of curtilage of heritage assets, to support Policy DM39.</p>	<p>No Likely Significant Effect. Screened out. This policy is associated with incorporating renewable energy generation to heritage assets This is a statement of intent and aspiration. The addition of the suggested changes to this policy is not expected to have any implications on European sites. Micro-renewables pose much less risk of impact on SPA interest features than larger scale renewables such as industrial wind farms.</p>	<p>Comments noted</p>
		<p>Further recommendations</p>	<p>Wording could include reference to screening/mitigation to reduce potential effects relating to effects upon the landscape surrounding the setting or curtilage of</p>		

Policy Number	Policy Title and Description	Implications on climate Change	Suggested Changes by LCC	Screening Outcome	City Council Comments
			the historic asset/renewable scheme.		
			Where heritage assets are commonly clustered, the wording could be expanded to include 'assessment of the contribution the setting and/or curtilage make to the significance of the asset, surrounding heritage assets and the general historic character of the area'		Amendments incorporated into supporting text.