



Historic England

Our ref: PL00749662
Your ref: LH/NetZeroCarbonDPD

Telephone [REDACTED]
Email: [REDACTED]

FAO:
Local Plans Team Leader –
planningpolicy@warwickdc.gov.uk

28 May 2021

Dear Sir/Madam,

Re: Warwick District Local Plan 2011-2029: SA/SEA/HRA Screening & Scoping Report for the draft Net Zero Carbon DPD

Thank you for consulting Historic England on the above document. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the development plan document (DPD).

SA/SEA/HRA Screening & Scoping Report

Our assessment of the SA/SEA/HRA Screening & Scoping Report for the draft Net Zero Carbon DPD is based on the Government's expectation that development plans contribute to the delivery of sustainable development in accordance with the National Planning Policy Framework; one of the core dimensions being the protection and enhancement of the historic environment (National Planning Policy Framework paragraph 8c).

Historic England has produced guidance for all involved in undertaking SEA/SA exercises which gives advice on issues relating to the historic environment – Historic England Advice Note 8. This can be found [here](#).

Historic England recognises the urgent need for positive action in relation to the global climate crisis and is committed to the achievement of net zero carbon emissions. Please follow the link below for Historic England's position on Climate Change and Sustainability:



Historic England, Midlands Regions Group, The Axis, 10 Holliday Street, Birmingham, B1 1TF

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Correspondence or information which you send us may therefore become publicly available.





<https://historicengland.org.uk/whats-new/statements/statement-on-climate-change-and-sustainability/>

Historic England is therefore fully supportive of Warwick District Council's commitment to become a zero-carbon organisation by 2025.

With regard to the SASEA/HRA Screening & Scoping Report for the draft Net Zero Carbon DPD we welcome that the 'Baseline Conditions' on p.6 reference the historic environment, and we suggest that the list of assets should also include Scheduled Monuments (para. 3.3).

In terms of the proposed scope of the SA/SEA, we are pleased to see that the assessment will be based on evidence, including information available through Historic England and we welcome that the same Objective 8 'To protect and enhance the historic environment', is to be utilised, as was previously used for the SA of the adopted Local Plan.

Historic England therefore considers the screening opinion findings for the Net Zero Carbon DPD acceptable.

Net-Zero Carbon DPD Consultation Draft May 2021

Whilst we appreciate that there will be a formal consultation on this DPD in due course, Historic England provides the following comments, which we hope will be of assistance to you at this early stage in the DPD's production:

Historic England notes that the DPD expands on Local Plan policies and introduces standards in development which will positively contribute to the new zero-carbon targets set by local and central government since the Local Plan was adopted in 2017.

We also note that one of the policy areas considered for the Local Plan was "climate change mitigation and adaptation, and the conservation and enhancement of the natural and historic environment" (para. 3.3.1), and that identified issues included "Pressure for new development and climate change threatening the high-quality built and natural environments in the district, particularly historic areas" (para. 3.3.2). Given that this issue is still relevant, Historic England is therefore disappointed in the lack of reference to the historic environment within the Net-Zero Carbon DPD.

Heritage assets can be a valuable aid to achieving sustainable development, in both climate change mitigation and adaptation, rather than a constraint, and we consider that the DPD should reference the retention and re-use of buildings, as many of the policies seem only to relate to new development. We consider that the document should recognise sustainability over the long-term. Historic buildings represent a significant investment of expended energy and demolishing and replacing them requires a major reinvestment of embodied energy and other resources. The DPD should therefore encourage and recognise the benefits of sympathetic restoration, retention, refurbishment and retrofitting of historic buildings.





Furthermore, we consider that policies should adopt a 'whole building' approach; looking firstly at a building's current environmental performance, then considering non-invasive measures and lastly physical interventions. Explicit reference should be made to the distinction between historic and modern fabric, as these cannot be treated in the same way; standardised methods are often inappropriate and will not only adversely affect the character and appearance of historic buildings and areas, but can easily reduce the performance of those buildings, and result in maladaptation (using more carbon to install and operate the measures than they can save). Such measures can have other unintended consequences for building use, such as poor indoor air quality, and "rebound" effects, which can make buildings less thermally efficient.

The following links to these Historic England publications may be helpful:

Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency
<https://historicengland.org.uk/images-books/publications/eehb-how-to-improve-energy-efficiency/>

"Planning Responsible Retrofit of Traditional Buildings":

<https://historicengland.org.uk/images-books/publications/planning-responsible-retrofit-of-traditional-buildings/>

Links to Historic England's publications on retrofitting of small-scale renewables -

Solar Power:

<https://historicengland.org.uk/images-books/publications/eehb-solar-electric/heag173-eehb-solar-electric-photovoltaics/>

Heat Pumps:

<https://historicengland.org.uk/images-books/publications/eehb-heat-pumps/heag172-heat-pumps/>

In addition to the references given above, Historic England has produced a series of stand-alone documents covering a variety of other topics. A full list of all our technical guidance on energy efficiency, including research reports which could form a useful part of the DPD's evidence base, can be found in our publication directory:

<https://historicengland.org.uk/content/docs/advice/technical-conservation-guidance-and-research-brochure-pdf/>





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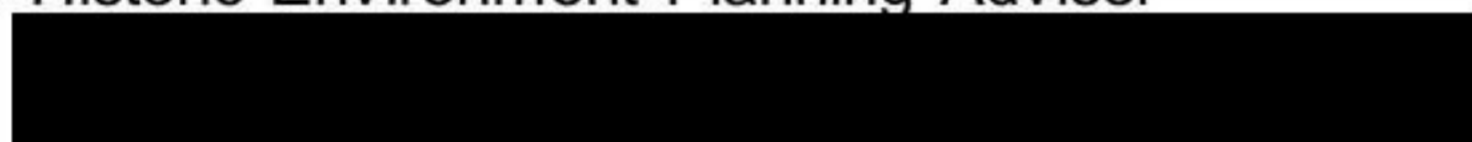
This opinion is based on the information provided by you in the documents dated May 2021 and, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object to any specific proposal which may subsequently arise from this or later versions of the documents which are the subject to consultation, and which may, despite the SA/SEA, have adverse effects on the environment.

If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully,



Elizabeth Boden
Historic Environment Planning Adviser



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