



Examination of the Merton Local Plan

Matter 3: Climate Change

Historic England, Hearing Statement

19/05/2022

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.

Historic England Hearing Statement

Introduction

- 1.1 This statement addresses the Inspector's questions with regards Matter 3 on climate change mitigation.
- 1.2 This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan.

Inspector's Questions Matter 3

Does the Plan include policies designed to secure that the development and use of land contributes to the mitigation of, and adaptation to, climate change? And are the climate change aspects of the plan consistent with national policy, in general conformity with the London Plan, justified and effective?

Issue (i) Do the climate change policies of the Plan ensure that the development and use of land contributes to the mitigation of, and adaptation to, climate change, and are they consistent with national policies, in general conformity with the London Plan, justified and effective?

Q6. Insofar as is relevant to proposals relating to the conversion or alteration of heritage assets, or in relation to development within their settings, do the climate change policies of the Plan pay appropriate attention to the requirement to conserve such assets in a manner appropriate to their significance?

- 2.1 As explained in our Regulation 18 (stage 2a) response, Historic England is committed to action on the climate emergency and recognises the urgent need for positive action. When considering the role of historic buildings in tackling climate change, we advocate an approach that understands sustainability in the long term and that is based on the reuse, repair, upgrade, and retrofit of existing buildings. In our Regulation 18 response we gave particular advice as to how the plan could better address climate and heritage, and we would direct the Inspectors attention to our previous response. The plan would be improved by introducing new wording and policy criteria to reflect our previous advice through modifications.
- 2.2 Policy D.12.5-part e encourages proposals to improve the energy efficiency of historic buildings. This is supplemented by paragraphs 12.513-12.515 of the supporting text. We have no in principle issue with the thrust of the policy, however it is based on assumptions that are problematic and the policy does

not contain adequate criteria to meaningfully address its objectives. As such both the climate objectives and heritage objectives may be frustrated. The plan at present is negatively written (notably at paragraph 12.5.15 and D.12.5-part e) in terms of how heritage is presented within the context of climate change, and as such does not set a positive strategy. The policy should set clearer criteria on the sorts of information that applicants should submit in support of retrofit proposals on historic buildings to help speed up the decision-making process and to provide clarity.

- 2.3 Policy D.12.5 focuses on the visual impact of energy efficiency measures. This is a factor, but in order to find progressive, positive policy solutions to addressing climate change the focus needs to be on building conservation and building performance. This is crucial given that historic buildings perform differently from modern buildings. The plan does not acknowledge that inappropriate retrofit or energy efficiency measures can adversely affect building performance which can have knock on impacts upon the fabric of the buildings. This can result in loss and damage, as well as making buildings less efficient which undermines the objective. When dealing with heritage the *significance* of the buildings and its conservation is what is important, but the plan does not reflect this, instead it only addresses visual impacts and setting.
- 2.4 It is important to acknowledge that historic buildings are not a barrier to climate change mitigation and that they have a role to play. Indeed, we need to be able to adapt historic buildings to ensure their continued existence and resilience. The goals of heritage conservation and climate change mitigation are compatible, and historic buildings can be retrofitted. It is a case of ensuring the correct measures are installed to avoid maladaptation and harm to significance, for instance by avoiding the use of standardised methods often designed for modern fabric. We advise that the plan is amended to reflect this given that the unintended consequences of maladaptation include:
- harm to heritage significance – loss of features and irreversible harm
 - harm to human health and building fabric: poor indoor air quality, condensation and mould growth, decay of building fabric
 - failure to achieve the predicted savings or reductions in environmental impact.
 - Can exacerbate fuel poverty

Q7. Policy GG6 of the London Plan requires planning and development to seek to improve energy efficiency and support the move towards a low carbon circular economy – how does the Plan respond to this, in particular in terms of encouragement of the re-use, retrofit and adaptation of existing buildings?

- 2.5 As advised in our Regulation 18 representation, reusing and retrofitting buildings is one of the most effective ways to reduce carbon emissions and eliminate unnecessary waste. This concept is a key part of delivering a low carbon circular economy as advocated by the London Plan. As we previously advised, the heritage sections of the plan would benefit from modifications to recognise the importance of reuse, refurbish, and retrofit in the first instance, over demolition and rebuild. A Core Principle of the London Plan's approach to a circular economy is develop a commitment that requires design to consider opportunities to reduce the demand for building materials; for instance, by prioritising refurbishment over demolition¹. We note that policy CC2.5 part a does seek to do this, and so does address the London Plan requirements in this respect. However, we consider that this should also be referred to in policy D.12.5 to recognise the role that historic buildings have to play in tackling climate change in order to help set a positive strategy for the conservation and enjoyment of the historic environment.

Q26. Does Policy CC2.4, insofar as it relates to the installation of heat pumps, achieve consistency with the Framework firstly, in terms of ensuring that a high standard of amenity is achieved for existing and future users of sites, particularly in terms of any potential noise impacts, and secondly, in terms of whether such installations would be sympathetic to local character and history, including the surrounding built environment and landscape setting, whilst not discouraging appropriate innovation and change?

- 2.6 Heat pumps can be installed while being able to conserve the significance of heritage assets and the wider historic environment. This is provided they are appropriately and sensitively installed, consider all relevant heritage issues, and are an effective response to the energy issues the areas in question are facing. As such it is important that blanket approaches are avoided when it comes to historic buildings. Heritage issues can be overcome with detailed design and sensitive installation. We do not consider there to be any inconsistency with the Framework in this respect, however the supporting text in the plan could be expanded to provide additional clarity on this matter.

Conclusion

- 3.1 The plan as drafted only addresses heritage and climate change at a very high level and makes unhelpful assumptions. This poses a risk to heritage and fails to set a positive strategy for its conservation and enjoyment. Additional policy criteria would overcome these issues, and this could be achieved through modifications. The stakes regarding need for climate

¹ London Plan Circular Economy Statement Guidance
https://www.london.gov.uk/sites/default/files/circular_economy_statements_lpg_0.pdf

change action are high, and so meaningful, detailed policies are warranted to ensure positive decisions can be made.