

Draft Statement of Common Ground between
London Borough of Merton and
Historic England

**On draft policies CC2.3 *Minimising energy use*, CC2.4 *low carbon energy*, D12.5 *Managing heritage assets* of the
Merton Local Plan Review**

The comments below follows submission of [Hearing Statements](#) from both parties including proposed main modifications relating to Matter 3, Climate Change on 20th May 2022 and a duty to cooperate meeting 23/05/22.

The page and paragraph numbers within this document are based on [Submitted Document 0D1 Merton's Local Plan Stage 3 Regulation 19 July 2021](#)

Areas of agreement

Historic England and Merton Council are committed to action on the climate emergency and recognises the urgent need for positive action. It is agreed that the plan must address climate change, including in the context of heritage.

Both parties agree to recommend the proposed main and additional modifications to the Planning Inspectors

Proposed edits to wording

MAIN MODIFICATION Page 56, after paragraph 2.3.23

Existing para 2.3.23 Developments are also encouraged to adopt recognised and successful fabric first approaches such as Passivhaus which is seen as the most stringent low 'energy in use' standard and is consistent with LETI's Climate Emergency Design Guide. This standard also relies on a more accurate energy demand assessment methodology using the Passive House Planning Package (PHPP).

NEW PARA Where proposals are within historic buildings and those of traditional construction when complying with Policy CC2.3 a-c, proposals are encouraged to use a holistic “whole building approach” that uses an understanding of a building, its context, its significance, and all the factors affecting energy use as the starting point for devising an energy-efficiency strategy. Planning adaptation measures using a “whole building” approach is a way of approaching retrofit in a manner which is holistic and risk based, considering the opportunities and consequences from integrating different energy efficiency measures on the function of an historic building fabric.

Reason: justified – an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence.

2.6.5 Proportionally, Merton receives a large number of minor development applications which involve the conversion and change of use of existing buildings to create new dwellings. In order to make our housing fit for the future, existing homes must be made low-carbon, low energy and resilient to a changing climate [11] through the uptake of measures including:

- Improved insulation in lofts, walls and floors;
- Double or triple glazing windows;
- Secondary glazing
- Low-carbon heating;
- Draught proofing;
- Highly energy efficient appliances
- Highly water efficient devices
- Passive cooling measures such as shading and ventilation
- Green space to reduce the risks of flooding and overheating
- Improved flood resilience and resistance

Reason – to improve clarity

MAIN MODIFICATIONS Page 404, D12.5 managing heritage assets (g)

D12.5 (g.) Proposals to existing heritage asset ~~buildings~~ should seek to improve the ~~proposals~~ energy efficiency effectively and sensitively and without detrimental ~~visual~~ impact upon the significance of the heritage asset, ~~or setting of the heritage asset by~~

- understanding its heritage significance, including any contribution made by its setting
- considering embodied carbon through reuse and retrofit
- using a whole-building approach to designing retrofit proposals to avoid maladaptation

Page 405 - Paragraph 12.5.3

Proposals to existing heritage asset ~~buildings~~ should seek to improve the ~~proposal's~~ energy efficiency effectively and ~~sensitively~~ and without detrimental ~~visual~~ impact upon its significance on the ~~heritage asset or setting of the heritage asset~~. Proposals which might affect a listed or conservation area building, should identify its heritage significance, including any contribution made by its setting.

Reason: justified – an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence

. Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

MAIN MODIFICATIONS Page 57, D12.5managing heritage assets

12.5.15

~~In the past there has been tension between the requirements to improve the energy performance and reduce carbon from buildings that are or that are located within heritage assets and the need to conserve these historic assets. The energy and carbon performance of historic buildings can be improved, which will help them remain viable and useful, now and in the future.~~ The council is supportive of efforts to tackle the climate emergency and will support positively consider proposals for retrofitting buildings that are themselves or within heritage assets, where a sensitive, whole-building approach to design and specification is taken which takes into account the fabric, and construction of historic buildings and ensures that their significance is not compromised, having regard to impacts on historic fabric, traditional construction, siting, visibility, design and advice set out in Historic England's guidance <https://historicengland.org.uk/images-books/publications/eehb-how-to-improve-energy-efficiency/>

Reason: justified – an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence

. Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Signatories

Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Signed for London Borough of Merton by:

Name: Chris Lee

Job Title: Director, Environment & Regeneration

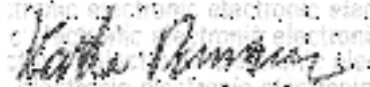
Signature: 

Date: 25 May 2022

Signed for Historic England by:

Name – Katie Parsons

Job Title – Historic Environment Planning Adviser

Signature - 

Date – 25 May 2022