



## **Consultation on the Dorset Council Planning for Climate Change: Listed Buildings – what you can do for climate change**

**Summary of issues raised and officer responses**

**December 2023**

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## Introduction

Dorset Council prepared three non-statutory guidance documents on planning for climate change. A public consultation on the draft versions of the documents took place from 20 April to 8 June 2023.

The consultation on the 'Listed Buildings – what you can do for climate change' document drew comments from 53 responders in the online survey, with a number of additional responses received by email. In the online survey around 232 responses to the individual questions were received.

The consultation drew comments from a range of responder types. These included statutory and national bodies such as Historic England, Sport England, and the Woodland Trust. Responses were also received from a range of local organisations mainly from the climate and energy sector. A broad geographical range of Town and Parish Councils responded, as did a number of developers and planning agents, and a number of members of the public. The comments received are summarised below, alongside the Council's responses to the comments.

## Summary of issues raised and officer responses

Key issue raised	Summary of comments	Officer response
<i>Key issue/topic</i>	<i>Comments made related to this matter (summarised/condensed)</i>	<i>Response to issue raised and state if change to document will be made or further consideration given.</i>
1. Welcome document	<p>Guidance is very clear, easily navigated and informative</p> <p>One of the best, most clearly laid out and purposeful documents that have been placed out to consultation for some time</p> <p>Checklist approach especially useful informing dialogue between parish council and potential planning applicants</p> <p>Good to see emphasis on holistic approach to energy efficiency analysis and implementation...the search for win-win outcomes is to be applauded.</p> <p>Links taking readers to relevant advice and information is welcomed</p> <p>Praise should be given to DC for the work they have done bringing their own buildings up to a good heat loss standard as shown in the case studies</p> <p>The listed building document is very helpful</p>	Welcome positive feedback

2.	Energy efficiency	Title of document is “what you can do for climate change” but it only deals with energy efficiency. Suggest changing title to “Listed buildings – improving energy efficiency”.	Suggest change title to: Listed buildings and energy efficiency – what you can do for climate change
3.	Case study on smaller listed building	Many respondents felt it would be beneficial to have at least one case study of a smaller listed building that is more typical of the majority of grade II listed building, however no examples that could be used as case studies were put forward. One person suggested their house but they are not in the Dorset council area.	One additional case study has been worked up for Rose Cottage, a detached but smaller Listed Building owned by the National Trust and situated on Brownsea.
4.	Assessment of heritage against climate change benefits	Want to see something that explains why the weight given to preserving heritage may outweigh climate change benefits – respondent wants to shift balance in favour of climate change	The Council works to national planning policy which places great weight upon heritage assets. If this changes in the future our approach will have to shift in line with new policy. At present the planning balance on listed buildings is such that for some measures the benefits are not considered to outweigh the impacts on the listed building. Only 1.5 % of the country’s housing stock is listed. The document is suggesting positive works that can be undertaken on Listed Buildings. No change required.
5.	Planning requirements too stringent	Planning should expand the list of things that can be done which improve building efficiency without planning or listed building consent with supporting guidance.	Requirements for planning and listed building applications are set by government, and local authorities do not have the powers to change this. The aim of the document is to provide guidance so that planning and listed building applications are more likely to be granted permission. No change required.
6.	Source of information	Section 2.5.1 states that only techniques and materials that have been demonstrated to be appropriate to the building fabric should be used – where does this information come from and is it legislation?	This is taken from Historic England document “ <a href="https://www.historicengland.org.uk/energy-efficiency-and-historic-buildings-how-to-improve-energy-efficiency">Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency (historicengland.org.uk)</a> ” Add reference to the document at section 2.5.1
7.	Constraints on secondary glazing	Should relax LBC constraints on internal secondary glazing where installation does not materially damage the fabric of the building.	This is outside the remit of the Council as legislated nationally. In most cases secondary glazing

		applications for Listed Buildings are approved. No change required.
8. Double glazing	Well designed heritage formed double glazing units can look as good as old single panel glass windows.	The explanation as to why double glazed panels are not acceptable and do not look equivalent to historic glass is covered in section 3.7 – “Can I install double glazing in my listed building?”. No change required.
9. Windows on listed buildings	The authors of the document appear to be under the impression that all Listed Buildings have the original fenestration, including the window glass. However many Listed Buildings have undergone considerable modification over the years before they were Listed. For example, windows and doors replaced; configuration of rooms changed; etc. Yet change after Listing is severely limited which directly effects any attempt to make a Listed building energy efficient let alone carbon neutral.	Once buildings are listed there is a requirement to obtain Listed Building Consent. The aim of the document is to encourage works to listed buildings that improve energy efficiency and are acceptable. Where original historic fabric exists in listed buildings, Councils have a duty to conserve this. For clarity, add 2.8.3 If you own or live in a Listed Building you will also need to obtain Listed Building Consent for many proposals (see 3.2) to section 2.8
10. Windows on historic buildings	Where major repairs are needed, consider that double glazing should be permitted unless stone mullion windows or historic glass is present.	Each proposal is considered on a case by case basis. Addition text added There are several ways of improving the thermal efficiency of historic houses other than changing windows, and windows are estimated to only account for 10-20% of the heat loss from buildings. The cost of double glazing will seldom be covered by energy savings within the lifetime of the glazed units. (Historic England Traditional Windows Their Care, Repair and Upgrading 2017).
11. Windows on historic buildings	Any double glazing installed should be similar to that which Historic England recommends for any historic buildings, the aim being not to adversely impact on the look of the building. <a href="https://historicengland.org.uk/images-books/publications/eehb-secondary-glazing-windows/">https://historicengland.org.uk/images-books/publications/eehb-secondary-glazing-windows/</a> Conservation Officers should approve Historic England approved wooden double glazing.	Historic England does not recommend the use of specific wooden double glazing. The document referred to relates to secondary glazed windows. No change required.

12. Increasing use of solar panels	Government is currently considering measures for increasing level of solar panel use in conservation areas, AONB and listed buildings...you should not reject all means of making such buildings energy efficient on grounds of heritage	The document states that you need to take a case by case approach, but that it may be possible to incorporate solar panels sensitively on Listed Buildings and / or within the curtilage of a Listed Building. Section 3.5 covers solar panels on unlisted buildings in Conservation Areas. No change required.
13. Solar panels on unlisted buildings	Installation of rooftop solar on unlisted buildings in designated areas is strongly supported as long as there is compliance with design, installation and removal criteria	There are existing permitted development rights covered in section 3.5.2 relating to solar panels on unlisted buildings. No change required.
14. Solar panels on listed buildings	DC should take a more sympathetic approach to rooftop solar on listed buildings as long as it does not damage the architectural features and fabric of listed buildings and impact on the street scene.	This is already the case – examples in 4.3 case study 3 low carbon Dorset include installation of photovoltaics on Blandford Forum Museum and the Dorchester Corn Exchange, both listed buildings. No change required.
15. Solar panel slates	We are in a climate emergency – slates that looks authentic but act as solar panels should be permitted.	In some instances, solar panel slates that look authentic have been given permission in Dorset. However they do need listed building consent and may not always be appropriate (particularly if the proposal involves removing historic tiles). New line added: “solar PV slates on roofs, Yes, May be acceptable if they do not involve removing historic slates”.
16. Consent orders for solar panels	Dorset should be taking Kensington and Chelsea’s example of implementing consent orders for listed buildings with regard to solar panels	The historic environment of Kensington and Chelsea is not comparable to Dorset’s architectural diversity. Whilst consent orders may be appropriate in the former (consent still needs to be applied for), Dorset is not proposing this at the current time. No change required.
17. Clarity required in document - Contact details	Need to include contact details where it states “please contact conservation team to discuss”.	The conservation team email and phone number will be added at the bottom of the table, together with information on contact times (9.30-5).

18. Clarity required in document Table	First option has a “yes/no” answer, suggest change to “it depends”.	Agree with suggestion – amend to “it depends”.
19. Solid wall insulation	<p><a href="https://sdfoundation.org.uk/wp-content/uploads/2018/01/2015_bristolsolidwallinsulationguidance.pdf">https://sdfoundation.org.uk/wp-content/uploads/2018/01/2015_bristolsolidwallinsulationguidance.pdf</a></p> <p>Relevant to all buildings of this type, not just Bristol. Not understanding how old buildings need to ventilate and breath and insulating without knowledge will cause cold bridges, rot and a lot of unexpected and expensive damage.</p> <p>A list of competent experts would be helpful.</p>	<p>Link to document welcomed, however the document <a href="https://www.historicengland.org.uk/energy-efficiency-and-historic-buildings/insulating-solid-walls">Energy Efficiency and Historic Buildings: Insulating Solid Walls (historicengland.org.uk)</a> contains similar information and will be added to the list of documents. A short section will be included on older, unlisted buildings.</p> <p>After 2.2.2 add sentence “It is important to understand how old buildings need to ventilate and breathe, as inappropriate insulation may exacerbate damp and associated structural decay.”</p> <p>As a Council, we are unable to recommend specific companies or experts as we could be considered to be showing bias.</p>
20. Non designated heritage assets	<p>There is statutory legislation covering the protection of non-designated heritage assets and these should be included in section 6.</p> <p>Much of this guidance is relevant and helpful to buildings that aren’t listed but are of merit, so why exclude those?</p> <p>More needs to be done to encourage and help your average person improving their home as much as they can afford to. (see also next response below).</p>	<p>The legislation covering non designated heritage assets does not specifically relate to energy efficiency works, but rather to setting and character. Reference added to non designated heritage assets under the relevant legislation section.</p> <p>Add the following text after 2.5 “What about old buildings that are not listed? The same principles and techniques laid out in this document apply to older, unlisted buildings, but owners will not need to obtain listed building consent, only planning permission where this is required.</p> <p>The list of measures included in the table and links at the end of the document to best practice guidance can all be used when looking to undertake work on older buildings that are not listed.”</p>

<p>21. Guidance needed for non designated buildings</p>	<p>Why is this targeted at listed buildings – should be providing guidance for non designated houses which make up most of the housing stock.</p>	<p>Listed buildings need more careful consideration when considering energy efficient measures, and are statutorily protected. There are a lot of best practise guides for modern housing so it was not felt this was required. No change required.</p>
<p>22. Energy performance certificate (EPC)</p>	<p>Para 3.9. It might be useful for landlords to know that it is anticipated that future government regulations may require rented homes to have an EPC or C or above.</p>	<p>Steven March has provided the following text to update in the document: Since the 1 April 2020, <a href="#">The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015</a> have required landlords to ensure that all rented homes achieve a minimum EPC rating of at least an E. Landlords are obliged to spend at least £3,500 in trying to achieve this energy rating. EPCs normally provide a list of the recommended improvements that can be carried out.</p> <p>If you rent out a listed building which has an EPC of F or G, you will need to carefully consider which recommended energy efficiency improvements can be completed, if Listed Building Consent is needed and whether it's likely to be granted. <del>either without the need for consent or with consent, which is likely to be granted.</del></p> <p>If no recommendations can be carried out as Listed Building Consent is not likely to be granted or all permitted works have been done and the rating remains below an E, then landlords can <a href="#">apply for an exemption to the regulations</a>.</p> <p>Landlords can also use the Council's online <a href="#">Energy Rating Improver</a> service to see what they need to do to comply.</p> <p>The Government has <a href="#">consulted</a> on increasing the minimum EPC rating for rented homes. This may see it change from band E to C. They have also</p>



		consulted on increasing the minimum amount that landlords must spend on energy efficiency improvements. This may see the 'cost cap' change from £3,500 to £10,000. No implementation date has been set for these changes; however it is recommended that landlords consider works which may 'future proof' against these possible changes or include suitable works in any upgrade plans they may have.
23. Ancient woodland	Suggestions as to using the ancient woodland inventory in the planning process	Outside the scope of this document – no change required.
24. Applications for multiple properties	It is important that collective systems for neighbourhoods or villages where listed buildings are included as part of a group of buildings are included within the guidance as this occurs a lot across Dorset.	It is possible to apply for group listed building consent, although this requires neighbours to work together and agree a common approach, and each property needs to be undertaking the same work. (This has happened recently where a row of listed buildings have applied for flood prevention works as one listed building application). It is not felt that this needs to be added to the document.
25. Funding opportunities	You could mention funding for works through Healthy Homes Dorset and / or national schemes	Agree, will add section at end "Potential funding sources" to include Healthy Homes Dorset. Text from Steven March to add: For free, impartial advice about energy efficiency and financial help, contact <a href="#">Healthy Homes Dorset</a> . <b>Lendology</b> If you're a homeowner or a landlord and you are interested in carrying out larger scale energy efficiency improvements to your home, then the Council have a wide range of ethical loans available up to £15,000. The potential eligible works are wide ranging and could include installing Solar Panels, Solar Thermal Systems, Air Source Heat Pumps,

		Ground Source Heat Pumps, Biomass Heating Systems or Solid Wall Insulation. For more information and a no obligation conversation about the help available contact our partner; <a href="#">Lendology</a> . Other funding sources to be added to list where they may fund energy efficiency projects.
26. Thermal imaging	3.1.3 refers to thermal imaging – this needs to be interpreted by someone with the relevant skills and experience	Add “this needs to be interpreted by an expert with the relevant skills and experience”.
25. Flooding	Guidance is needed to help ensure owners of listed buildings to protect their properties from the negative impacts of climate change such as increased flood risk.	There are many examples of granting proposals for alleviating flooding in listed buildings, particularly in Sydling St Nicholas and Sherborne. Section added “works to reduce impacts of climate event.
26. Suggested addition to quick wins	Add window film insulation for use on wooden or metal windows	This would need to be assessed on a case by case basis. No change needed.
27. Clarification of text	While we (Historic England) welcome the advice in Table 3.3, we recommend that this is carefully crossed checked against the similar guidance in Historic England Advice Note 16: Listed Building Consent ( <a href="https://historicengland.org.uk/images-books/publications/listed-building-consent-advice-note-16/heag304-liste28.d-building-consent/">https://historicengland.org.uk/images-books/publications/listed-building-consent-advice-note-16/heag304-liste28.d-building-consent/</a> ) For example, while the commentary in Table 3.3 relating to draught proofing is generally consistent with Historic England’s guidance, the advice relating to boilers and radiators is probably too definitive in suggesting that consent is not required. By contrast, in discussing heating systems, boilers and radiators, HEAN16 identifies important exceptions (see advice on works, number 33).	This guidance has been cross checked against the Listed Building consent advice note 16. Change advice on boilers and radiators to “it depends” with text to clarify Add additional text to clarify the situation with regard to heating systems and boilers
28. Clarification of text	In para 3.4.3 replace the wording “sufficiently substantial” with “sufficient” to avoid any potential confusion when applying the NPPF policy tests relating to substantial / less than substantial harm	Agree with suggestion – in para 3.4.3 replace the wording “sufficiently substantial” with “sufficient”
29. Additional / updated links to add at end of document	Add Historic England recent document providing case studies of use of air source heat pumps on small scale historic buildings: <a href="https://historicengland.org.uk/images-books/publications/air-source-heat-pumps-historic-buildings/">https://historicengland.org.uk/images-books/publications/air-source-heat-pumps-historic-buildings/</a>	Add links in and check that all documents are up to date

	Historic England's webpage relating to heat pumps in historic buildings has been updated: <a href="https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/low-and-zero-carbon-technologies/installing-heat-pumps-in-historic-buildings/">https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/low-and-zero-carbon-technologies/installing-heat-pumps-in-historic-buildings/</a>	
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