

Winchester City Council Local Plan - Strategic Issues & Priorities Consultation

<https://winchester.citizenspace.com/policy-and-planning/wcc-local-plan-sip>

The consultation ran from 15/02/2021 to 12/04/2021

Responses to this section:

1: Is there any need for any additional heritage policies over and above those that are already included in the existing Local Plan?

2: Do you have any suggestions for how the Local Plan can be used to support energy efficiency improvements to Listed Buildings?

The responses to both of these questions are analyzed below:

62 respondents either had no comment or no suggestions (C2, C12, C32, C38, C81, C103, C112, C114, C123, C136, C148, C150, C160, C168, C181, C186, C216, C234, C245, C256, C278, C280, C325, C326, C345, C346, C347, C348, C350, C351, C361, C372, C375, C378, C382, C407, C413, C416, C461, C477, C491, C500, C501, C511, C566, C567, C568, C569, C602, E1082, E1114, E1128, E1149, E1162, E1182, E1216, E1219, E1221, E1228, E1230, E1233, E1237)

3 respondents commented that this was not their area of expertise or it was unknown (C75, C492, L29)

1 respondent commented that it was not worth it/waste of money (C191)

1 respondent commented that it was it had aspirational suggestions (C306)

Comments from Historic England (E1214)

- There should be a strategic policy for the historic environment and a suite of development management policies for individual cases
- Hampshire Garden Trust keeps a register of historic parks and gardens – it is not clear if these are considered as non-designated historic assets for planning purposes - this should be clarified.
- DM25 seems to apply mainly to designated parks and gardens, but the supporting text also refers to ‘locally sensitive sites’ - we would recommend clarification as to which policy – DM25, or DM31, non-designated parks and gardens are considered
- There is no specific battlefield policy in the current Local Plan and whether as result of the Battle of Cheriton 1644, the council needs to consider including one in the new Local Plan
- There is no local list of heritage at risk register - recommend that there is a heritage at risk policy and a local list of heritage at risk to include grade 2 listed buildings that are not on Historic England’s Heritage at Risk Register
- There should be a strong link between design policies and heritage environment
- Supportive of policies towards increasing energy efficiency (further guidance is on HE website) – there needs to be good understanding of how the building was constructed and how it was designed to function in order to ensure that there is no harm to a Listed Building
- There is currently no list of non-designated heritage assets. There has been a pilot project, the Winchester Future 50 project, which had begun work on devising a list of non-designated heritage assets, however, as this project ended in 2020 there should be a commitment to do this work in a measurable timeframe to comply with the NPPF and to ensure that the current approach that is set out in Policy DM31 is feasible
- Important to acknowledge that LB’s make up a small proportion of the buildings in Winchester (not all will be dwellings), only around 4% are dwelling stock
- It should be acknowledged that energy usage and carbon emissions are emitted when a building is constructed – important to consider this over the lifetime of a home
- HE would support policy similar to the SDNPA (Policy SD14)
- The NPPF requires a positive strategy towards the historic environment and a complete list of non-designated heritage assets is essential
- HE would expect references to the historic environment in a range of other LP policies, throughout the Plan and in the vision for new Local Plan

- There should be a Local Plan policy that addresses potential listing over the plan period of as yet unidentified historic assets, importance of retaining or restoring historic shopfronts, specific policy on the inclusion of renewable energy technologies within Conservation Areas and the wider historic environment.

General approach

6 respondents commented that there should be changes to planning permission that it is easier to make changes to Listed Buildings if they are in the interest of the environment/more realistic interpretation of listed building requirements (C20, C124, C176, C189, C370, C546)

5 respondents commented that Listed Buildings should be preserved as built – including their setting and should recognise today's built environment forms a part of our future heritage and should not be to be detriment or character of historic place or structure (C5, C464, C600, L50, M17)

4 respondents commented that owners should be allowed internal improvements that do not disturb the appearance of the property e.g. double/triple glazing than is more energy efficient than is currently allowed (C101, C121, C530, C542)

4 respondents comments that there should be little more flexibility but ensuring to keep the fabric and authenticity of the building remains intact/ invisible to the visitor (C244, C360, C386, C561)

3 respondents commented why only Listed Buildings as support should be provided to enable all buildings to become more energy efficient and ideally carbon-neutral (C394, C561, C574)

3 respondents commented that the energy efficiency of the small number of listed buildings will have limited impact of carbon reduction and inappropriate works may damage their historic authenticity (C243, C305, C511)

2 respondents commented that we should encourage conversion of these spaces to use energy more efficiently - if people use them then they should be energy efficient (C190, C543)

1 respondent commented that the details have not been explained but changes that destroy the reasons for the listing would be self-defeating and wrong (C356)

1 respondent commented that we should review of conservation area and listed building policies to see how they can be reconciled more effectively with the need to retrofit buildings to ensure they are more energy efficient (C365)

1 respondent commented that we should investigate more efficient means of heating for the winter and keeping cool in the summer that does not detract from the essential character of the listed buildings (C360)

1 respondent commented that there is a need to educate younger generations about the importance of conserving the historic environment but this is outside the remit of the Local Plan (C603)

1 respondent commented that any energy efficiency improvements must be done in a way that preserves/sympathetic to listed buildings (C100, C260, C539)

1 respondent commented that with minimal changes to internal and external facades to introduce hidden forms of heating and ventilation using existing structures to hide the necessary pipework etc and the creation of new, "in-keeping" vents and grilles permitted (C542)

1 respondent commented that historic/listed designation should not be used for a barrier to sustainable improvements (C532)

1 respondent commented that we should be more supportive of modern technology as listed buildings have/should evolve over centuries to ensure they provide for modern expectations and comfort whilst also retaining the historical integrity (C528)

1 respondent commented that we should be a loosening of regulation on types of materials and ways of working on some of the perhaps slightly less valuable historic buildings to allow them to be more energy efficient, yet retaining their outer visual character would be good (C385)

1 respondent commented that we should allow facades of historic buildings to be kept with the rear being redeveloped using modern materials and allowing updates to the usage of the space, making it more efficient / suitable for a wider variety of purposes (C121)

1 respondent commented that we should permit anything that isn't a permanent change (C436)

1 respondent commented that the principle of a listed building is that nothing can be done without permission - some cases, work has already been done, which needs undoing which should be allowed (C586)

1 respondent commented that we should focus on maximising the standards for new development and refurbishment of non listed buildings (C511)

1 respondent commented that we should be sensible and realistic as to what can be achieved. Some buildings will not achieve goals without disproportionate investment that could be delayed in favour of essential service provision (C563)

1 respondent commented that most listed buildings are in the city centre- develop empty shops/ offices and people will be able to walk to them (C167)

1 respondent commented is this a Pareto issue? Or is it a third or fourth level of unimportance? (C273)

1 respondent commented that Ancient Monuments such as Tumuli have little or no protection - development (such as the eyesore house on Texas Drive) was granted because there is no overall consideration given to Historic monuments unless they happen to be buildings (C274).

1 respondent commented that we are not preserving the buildings we have and keeping them up to standard (C482)

1 respondent commented that it supported WDC's intentions to conserve and actively enhance heritage assets located within the district and this should be a key consideration as the plan is developed and to reflect on recent national events, to consider whether any heritage assets may have any negative impact upon the public and local communities and how any negative impacts might be alleviated whilst still conserving the historic environment (E1220).

1 respondent commented that along with the conservation area appraisals, WCC may want to identify heritage assets, which are considered to be at risk of irreversible harm or loss which could refer to buildings, monuments, sites, places, areas or landscape identified as having a degree of significance (E1240).

Technology

4 respondents comments that the council should be supportive of the use of technology which can improve the energy efficiency of Listed buildings (e.g. heating/lighting/insulation) (C4, C117, C511, C514)

Renewable energy products

3 respondents comments that the council should permit use of tiles, slates & cladding that are solar collectors designed to look the same as the original and do not detract from its character, retain all lead flashing, incorporate rainwater collection to use for toilet flushing, include a quotation for ground heat extraction (C36, C360, C376)

4 respondents commented that air source heat pumps in Listed Buildings are perfectly possible with support (C165, C264, C376, C599)

2 respondents commented that the council should encourage roof insulation and under-floor insulation providing that the floor finishes can be reinstated with minimal damage - underfloor heating can be installed at the same time, which could make these buildings easier to warm/to save their appearance using radiators or other heat sources (C542, C437)

1 responded commented it was difficult to achieve a greater use of renewable energy and this will probably have higher unit cost (C58)

Solar

2 respondents comments that the integration of on-site renewable power (such as solar panels) should not be ruled out due to aesthetics as they are removable (C78, C436)

2 respondents commented that we should allow replacements with modern materials which retain the look and feel of traditional materials e.g slim dark solar PV on slate roofs or outbuildings (C542, C599)

1 respondent commented that Listed Buildings are not allowed solar panels on roof (C6)

Wind

1 respondent comments that we should take advantage of technology such as windmill pods that can be used to generate energy and not be too intrusive (C440)

1 respondent comments that there should be more solar panels (C475)

1 respondent commented that we should use wind generators and district heating for "island" parishes (C560)

Double/triple glazing

5 respondent's comments that more flexibility is required to enable specialist double glazed windows/doors as building have been moderised throughout history (C15, C360, C365, C392, C437)

1 respondent commented that owners of listed buildings such as the Victorian hospital blocks at Knowle must be permitted to add double glazing and other measures to reduce the energy costs (C277)

Other energy sources:

1 respondent commented that we should allow power generation by water from all the ancient mill sites (and others beside) (C584)

Water/waste/recycling/draught proofing

2 respondents commented that in Listed Buildings we should improve water use and waste water recycling, use rain water more efficiently, draft proofing which can be installed without having an impact on the fabric of the building (C127, C177)

Growing plants

2 respondents commented that the setting of historic places which need to consider the possibility of using the landscape to grow plants that produce, fruit, nectar, nuts and seeds and the planting of more trees (C516, C535)

EPC

1 respondent commented that energy efficiency improvements can be done via the EPC upgrade route (C539) whereas 2 respondents had a contrary view and commented that the EPC system is flawed as it does not measure energy efficiency but costs – heat losses and draughts should be done by thermal imaging (C539, C542)

Building Regulations

18 respondents comments that this issue should really be dealt with in Building Regulations rather than a local plan (C87, C88, C111, C192, C239, C286, C292, C327, C361, C399, C404, C408, C493, C494, C567, C568, C569, E1230)

Grants

12 respondents commented that there should be greater use of grants / planning policy to enable more energy efficiency measures (C20, C22, C40, C194, C352, C392, C395, C439, C517, C538, C554, C598)

Off setting

5 respondents comments that we should use offsetting to achieve environmental objectives of improving historic buildings (C40, C46, C147, C260, C550, E1216)

Best practice/working with others/recommended suppliers

10 respondents commented that we should offer a service to enhance energy efficiency improvements / bring together experts on energy efficiency and owners of historic buildings to find solutions and make suggestions that do not comprise the special qualities of Listed Buildings or increase the cost of retaining the building (C198, C252, C313, C342, C429, C445, C480, C542, C586, C342)

4 respondents comments that the City Council should work with Winchester College and the Cathedral, and the County Council, Guildhall, Council Offices, National Trust, English Heritage to bring forward exemplar projects in their own listed buildings to demonstrate to the owners of listed buildings what can be achieved (C23, C574, C584, C599)

4 respondents commented that we should take guidance/work with and encourage reference from Historic England to develop list of approved products (C246, C462, C542, E1182)

1 respondent (the City of Winchester Trust) commented that Historic England has published guidance on this subject which the Local Plan could encourage the owners of listed buildings to consult (E1218).

1 respondent commented that there is a danger of misplace enthusiasm to retrofit or renewable energy generation that can compromise the historic integrity or aesthetics of a historic asset (E1182)

1 respondent commented that we should create a list of recommended suppliers (who might consider reduced prices for economies of scale) (C598)

1 respondent commented that the Plan should draw on good quality research to promote state-of-the-art solutions that preserve the character of the Listed Buildings, while increasing their energy efficiency (C480)

1 respondent commented that we should ask Winacc as they have some experience of this (C90)

1 respondent comments that there should be better support for the owners of thatched houses to improve energy efficiency (C187)

1 respondent commented that we should discuss this with experts who have access to private capital, such as SDCL (C549)

1 respondent commented that we should give support to owners through giving them ideas and a list of suppliers to help with maybe some by magnetic held panels you can put in over listed windows so the windows remain but the heat doesn't escape through them and improving insulation in roofing (C321)

1 respondent commented that we identify known issues and suggest how they can be addressed, with sketch designs if necessary – e.g. work to windows and adding solar panels (C47)

1 respondent commented that we should focuss on the development of historic buildings as part of their attraction to residents and visitors, including re-purposing buildings where appropriate (such as parts of Guildhall) (E848)

1 respondent commented that WCC should adopt, modify and implement the suggestion made by the Town Forum's One-Great-Win exercise that a stocktake should be taken of all the facilities, formal and informal, that are used for cultural purposes in the District and update the Cultural Strategy for Winchester (E848).

Energy use

1 respondent commented that the energy use of Listed Buildings may be high, the embodied carbon calculated over the lifetime of the building will be low - should calculate the lifetime carbon of the building which, if several hundred years old, would 'allow it' to be a low carbon building per year (C586)

2 respondents commented that heating must be one of the main energy costs of Listed Buildings and therefore guidance on providing green, renewable energy would make them more sustainable (providing it does not have an impact on them) (C42, C63)

2 respondents commented that we should encourage and incentives to move away from fossil fuel based heating sources (e.g. oil) to new and developing technologies (heat pumps, electric boilers etc) (C293, C352)

1 respondent commented that energy efficiency related policies include sufficient flexibility to allow for bespoke, high quality approach to be agreed concerning individual schemes – the principle should also be applied to schemes concerning heritage assets (E1092)

1 respondent commented if feasible, energy efficiency measures should be carried out on a case by case basis rather than having blanket LP policy as energy-efficient changes should not be demanded if the impact on a building will damage the reason for its listing in the first place (E1228)

1 respondent welcomed the principle of WCC identifying if there is anything that the Local Plan can do to support energy efficiency improvements to Listed Buildings (E1240)

1 respondent commented that many historic buildings perform well in terms of energy efficiency, and there must be a careful balance when seeking alterations to a listed building for the purposes of energy efficiency adaptations, especially when considering the impact of breathability of build fabric or harming features of interest (E1240).

1 respondent commented that various adaptations can improve energy efficiency without impact on the integrity of the listed building (e.g. insulation to walls and roofs, solar panels and alterations to windows) (E1240).

1 respondent commented that they fully support conserving the historic environment and accept that retrofitting historic buildings to be more energy efficient can be quite difficult and should, we feel, be less of a priority than more modern buildings that may be easier and cost less and cover a larger majority of houses and families (E1245).

Greenfield/brownfield

1 respondent commented that we should prioritise use of Listed Buildings before allowing development on greenfield sites and works associated with improving them to bring them in line with desired use would enable energy efficiency improvements at the same time (C236)

1 respondent commented that where possible, chimneys could be fitted with register plates which would reduce draughts and airflow tests could be performed to identify other sources of draughts, and where possible these should be filled or covered (C542)

1 respondent commented that some listed buildings could be regarded as Brown field opportunities for development - Comprehensive encouragement expressed to promote a clearer expectation of those development opportunities should be incorporated within the plan submission (C248)

Wildlife

1 respondent commented that we should preserve the tiny pockets of ancient habitat that still exist in our hedgerows, which would disappear if new towns were built (C33).

1 respondent commented that several Parish councils some with the support of Winchester City have promoted ideas of open community uses such areas designation as Community Areas. These designations should be incorporated with the local plan and be supported against development pressures (C248)

1 respondent commented that use of the ancient landscape for farming has minimal impact on Carbon use (C274)

Planning policy

3 respondents commented that we should include the SDNP SD14 policy in the Local Plan to allow Listed Buildings to become more energy efficient (C144, E1221, E1240)

2 respondents commented that Policy DM23 should be strengthened to make it more difficult to develop outside defined settlement boundaries, particularly where this would have an adverse impact on landscapes not specifically protected by designation. or DM25 (C208, C305)

2 respondents commented that Policy DM28 needs to be enhanced to remove any potential gain from unauthorized demolition (for example, by a presumption that sites where this has happened will not receive consent for market homes). Where an owner has failed to comply with Council orders to maintain a property, it should not be considered to be incapable of repair (C208, C305)

1 respondent commented that the existing suite of heritage policies provide robust protection for the District's designated and non-designated heritage assets (C515, C342)

1 respondent commented that all policies should be reviewed to see if they unnecessarily hinder emissions reduction or energy saving improvements to buildings, in particular energy-saving restrictions placed on listed buildings (C343).

1 respondent commented that the council needs to be much more rigorous in how it approves planning applications for buildings in this area to ensure that they are in keeping with those homes around them (C408)

1 respondent commented that each settlement, and its setting, must be judged on its merits (C464)

1 respondent commented that they were supportive of the conserving and enhancing the historic environment as a key topic for inclusion in the SIP and the positive contribution that development can have on the on the setting of historic assets (E1179)

1 respondent commented that whatever policy is developed it must rely on clear cut rules able to be assessed objectively rather than relying on woolly subjective judgements (E343).

1 respondent commented that the policies should be reviewed/revised to acknowledge the expected changes to living/working patterns post pandemic, and also because of the priorities of the Movement Strategy - all of these influences may result in changes to buildings and the ways they are used and to the public realm and the way it is used (E1218)

1 respondent (City of Winchester Trust) commented the preparation of Conservation Area Appraisals and their review should be retained (Winchester's conservation area was reviewed over 20 years ago and so should be reviewed again as soon as possible), there should be a new or updated heritage-related SP, A local heritage list, the council should build on the work of the Winchester Future Fifty project, update and extended design guidance for shopfronts, signs and advertisements and create an addendum document to the adopted High Quality Places SPD that includes guidance on adapting older buildings in conservation areas so that they are more energy efficient and able to accommodate new uses without compromising the historic character of the area (E1218).

1 respondent commented that the Silver Hill project (Central Winchester Regeneration) needs to show more concern for the antiquity of central Winchester (E1219)

1 respondent commented that WCC heritage policies of the Local Plan must protect Winchester's wealth of heritage assets and whilst energy efficiency improvements are supported, it should not be to the detriment or character of historic places or structure (E1232).

1 respondent commented that policies must rely on clear cut rules able to be assessed objectively rather than subjective judgements (E343).

NPPF

3 respondents commented that policies in the new LP should align or at least cross refer/compliment the latest version of NPPF (E1092, C515, E1209)

General comments

1 respondent commented that there should be less development (C290)

1 respondent commented that atmospheric pollution affecting these historical structures it is important and large scale developments in particular will have an impact of the historic environment (C326)

1 respondent commented on the need to focus developments on brownfield sites and use of current town and city centre spaces for residential properties, greenfield sites need to be preserved as they are a crucial part of our heritage, support the economy through valuable food production (increasingly important, following our exit from the European Union), and are important havens of wildlife and biodiversity (H12)

1 respondent comments on the need to preserve the reasons why many of us choose to live in the Winchester area. Green spaces, clean air, a historic, vibrant and interesting city centre, not just an overdeveloped soulless conurbation. City centre needs to be redeveloped to reflect the future not the past. More homes in the centre area, better green transport links to the outlying area and housing developments in the Winchester area need to be cohesive communities, not just bolted on to existing places or just Winchester expansion (C75)

1 respondent commented that green spaces need to be preserved and that any new plans for development look to use the brown field sites before considering our greenspaces. Any plans for new development should also look to preserve the city boundary and prevent urban sprawl (C404)

1 respondent commented that the plan is very Winchester town centre centric. Needs to be more about how to help villages can thrive, policies to protect the open countryside around villages, live in a more carbon neutral way with less dependency on car, greater use of cycling and walking but need to recognise that not all places are accessible from a safety perspective, greater amount of recreational space, attract more independent shops (H128)

1 respondent commented that need to protect valuable countryside and this district's character and history in particular, cannot support new towns in the countryside. The environmental impact of building on greenfield sites must be taken into account, brownfield site building being given better support. Important to an area like this where the rural nature of the area and its history is vital to its character and economy, not just to look at the environment concerns (E197)

1 respondent commented on the need for stronger protection for those historic items and buildings which are not protected by Listing (C342).

1 respondent commented the council should focuss on the development of historic buildings as part of their attraction to residents and visitors, including re-purposing buildings where appropriate e.g. parts of Guildhall (E848)

1 respondent (City of Winchester Trust) commented that Winchester is a complex city, it has significant issues to deal with and its priorities will be different to those for the rest of the district and therefore needs its own strategic plan (E1218)

1 respondent commented that the council should focus development to the north of the city to alleviate pressure to infill and redevelop smaller urban infill sites where there is potential for adverse impact on townscape, the setting of heritage assets and conservation character will appear at their greatest (E1121)

1 respondent commented that there is a need to educate younger generations about the importance of conserving the historic environment but this is outside the remit of the Local Plan (E1230).

1 respondent commented (Network Rail) that some of the heritage features could be improved externally and internally at the stations within the district if the funding is available for an improved passenger experience (E1236).

Comments on Conservation Area Assessments:

Conservation area assessments for Wonston, Sutton Scotney and Stoke Charity exist and form part of the current Local Plan and respondent E1242 would like to see the following included:

- Wonston conservation area to be extended to the north along Grange Road as far as Beech Cottage and the properties opposite to the east.
- Sutton Scotney conservation area to be extended to the north to include the surviving railway embankment adjacent to the Gratton and the bridge abutment adjacent to the A30.
- To seek protection for the road bridge over the former railway line on Wonston Road.
- Protection for the medieval moated site earthworks at Cranbourne.

Comments on specific SHELAA sites:

Royaldown – H78, H124,

South Winchester Golf course – H108

Wellhouse Lane, Winchester – E1121

Bushfield Camp/land at Littleton – E1179

SJM Barracks (E1092)

Summary of main issues:

- Dealing with energy Listed Buildings is more complicated when you are considering energy efficiency improvements, in terms of what you can / cannot do to the structure and fabric and the setting of a building when compared to other housing stock
- The need to acknowledge that whilst the energy use of Listed Buildings may be high, the embodied carbon calculated over the whole lifetime of the building will be low
- It is important to not solely focus on for example, measures such as 'double glazing windows' but we need to think about the use and operation of the whole building and its surrounding environment and what positive measures you could do without damaging the integrity of the LB.
- How can you the LP create a permissive policy that protects the fabric integrity of a LB and setting of the LB whilst at the same time promoting energy efficiency measures as otherwise this would undermine the purpose of having a building listed?
- There were a cross section of different and sometimes conflicting views on how you can use technology to improve the energy efficiency measures of a LB (air source heat pumps/underfloor heating solar panels etc)
- The council should offer a service and work with a range of other organisations to enhance energy efficiency improvements / bring together experts on energy efficiency and owners of historic buildings to find solutions and make suggestions that do not comprise the special qualities of Listed Buildings or increase the cost of retaining the building
- The LP could be used as signpost people to existing best practice / guidance that is already out there
- The LP should support the need to update Conservation Area Appraisals, build on the work of the Winchester Future Fifty project, update and extend design guidance for shopfronts, signs and advertisements and create an addendum document to the adopted High Quality Places SPD so that they are more energy efficient and able to accommodate new uses without compromising the historic character of the area