



Historic England

## **Examination of the Westminster City Plan 2019-2040**

### **Matter 7 – Environment**

#### **Historic England, Hearing Statement**

**26/06/2020**

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 7, policies 33-38 of the City Plan,
- 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 7

**Issue: Whether the City Plan is justified, effective, consistent with national policy and in general conformity with the London Plan in relation to the environment.**

**19) Are any other modifications to Policies 33-38 necessary for soundness?**

- 2.1 There is some concern about the potential effect of policy 37 upon the historic environment. Historic England supports a policy response to tackle climate change and the need to lower carbon emissions, but the plan could more effectively set out how historic buildings should be treated. This is part of setting a clear, positive strategy for the conservation of the historic environment in line with NPPF paragraph 185. Please see our representations in response to the regulation 19 and pre-regulation 19 consultations for full details.
- 2.2 Throughout the plan there is an emphasis on retrofitting existing and historic buildings. Westminster is a borough with a high stock of historic buildings and so the policy should set out the different between dealing with adaptations to modern fabric and historic fabric if the goals of the policy to be achieved. As well damaging historic fabric, inappropriate retrofit to a historic building can reduce thermal efficiency and reduce energy performance contrary to the purpose of the policy. This combined with the large historic building stock means that there is a real risk that this policy will not be effective in lowering emissions and will cause harm to the historic environment.
- 2.3 If the policy is silent on the distinction between historic and modern buildings it is likely to increase the risk of protracted discussions at planning application stage. A more detailed, robust policy on energy would enable the planning framework for Westminster to be more efficient and predictable, and provide a strong indication as to how decision makers should react.

## **Conclusion**

- 3.1 Modifying the policy so that it better advises how historic buildings should be treated would set a positive strategy for the historic environment and clarity for decision makers. Given the number of listed buildings within the borough and the multifaceted risks attached to inappropriate energy efficiency measures, this is considered to be a proportionate response to make the plan sound. Modifications could highlight the risks of using standardised energy efficiency measures on more traditional construction, and the need for a “whole house” approach to determining the best method of adaptation. Please previous pre-regulation 19 responses for details as to how the policy could be modified.