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| Subject: | Planning Advice Notes on energy efficiency | | |
| Date of Meeting: | 10 March 2016 | | |
| Report of: | Acting Executive Director of Environment, Development and Housing | | |
| Contact Officer: | Name: | Francesca Iliffe | Tel: 29-0486 |
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| Ward(s) affected: | All | | |

FOR GENERAL RELEASE**1. PURPOSE OF REPORT AND POLICY CONTEXT**

- 1.1 The report seeks approval of two Planning Advice Notes (PANs). PANs provide detailed technical guidance and information on planning policy/development matters
- 1.2 The two PANs cover: energy efficiency improvements for historic houses in conservation areas; and external wall insulation. The PANs are targeted at householders and will assist with encouraging energy efficiency improvements to houses; help mitigate against fuel poverty; provide helpful guidance and reduce the need for residents to make enquiries to the planning service.

2. RECOMMENDATIONS:

That the Economic Development and Culture Committee:

- 2.1 Notes the consultation findings and approves for publication the Planning Advice Note: *Householder guidance on external wall insulation* and the Planning Advice Note: *Householder guidance on energy efficiency for historic houses in Conservation Areas*, subject in each case, to agreement on the design of the Planning Advice Notes, including the addition of images and visuals, by the Head of Planning and Building Control and any minor editorial changes which he considers necessary.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 Planning Advice Notes (PANs) are prepared by the Council to provide technical advice and information on certain policy areas. These PANs are aimed at householders and provide guidance on external wall insulation for houses; and how to improve the energy efficiency of historic houses in conservation areas. They introduce no new requirements for planning applicants and should assist with schemes by consolidating and clarifying heritage and sustainability policy provided by the Planning Authority under the Local development Framework.

- 3.2 Under the Modernisation agenda, planning policy and guidance is being streamlined. As part of this the PANs aim to create service efficiencies and improve customer experience, clarify planning issues, and reduce the need for enquiries to the planning service.
- 3.3 Brighton and Hove has some of the most energy inefficient housing in the UK. Improving energy efficiency in homes through long term improvements can address fuel poverty now and in the future via lasting energy bill reductions. These can also help reduce risk of death and ill health associated with cold homes. According to recent estimates fuel poverty levels are higher in Brighton and Hove than elsewhere in England: the English average is 10.4% compared to 11.9% in Brighton and Hove. Fuel poverty levels are predicted to rise. The UK has one of the highest excess winter death levels in Europe (more than 30,000 in 2013) despite a moderate climate.

Policy Context

- 3.4 The PANs accord with policies in the Submission City Plan Part One policy *CP8 Sustainable Buildings*; *CP15 Heritage*; and *SU2 Efficiency of Development in the use of energy* and *HE6 Development within or affecting the setting of a Conservation Area*; and also *SPD09 Architectural Features* in the Brighton & Hove Local Plan 2005 (which have been saved and will be retained until replaced by Part 2 of the City Plan).
- 3.5 Targets for carbon emissions reduction are set in the Sustainable Community Strategy and the City Sustainability Action Plan: 42% reduction in carbon emissions against 2005 levels by 2020 and 80% by 2050. The PANs will assist with achieving these targets.

Background

- 3.6 Housing is responsible for 30% of UK carbon emissions whilst in Brighton and Hove this figure is 42%. This is largely due to a high proportion of older housing. Pre-1919 houses emit on average 9 tonnes CO₂ per year, whereas a post 1930 house emits on average 4.5. In the city 40% of private sector housing was built pre-1919 (whereas the UK average is 25%).
- 3.7 The *Brighton & Hove Renewable and Sustainable Energy Study (2012)* found that to achieve the city carbon reduction target, emissions from buildings must be reduced by 137,000 tonnes annually. Of this, over 50% will need to come from the retrofit of existing private sector housing through energy efficiency improvements and the installation of renewable energy micro-generation.
- 3.8 The study identified older housing and houses in Conservation Areas present a great challenge for carbon reduction. It found that insulation of solid walls created the greatest opportunity to reduce heat loss and emissions from the 44,500 older, solid wall homes in Brighton & Hove.
- 3.9 The PANs have focused on the planning issues around external wall insulation and retrofit in Conservation Areas (internal wall insulation does not require planning permission). The PANs clarify policy and encourage measures to be applied sympathetically and effectively where appropriate.

- 3.10 Preparation of the PANs was supported by the Low Carbon Trust and the council's Housing Sustainability Team who secured funding from the Department of Energy and Climate Change.
- 3.11 The PANs have been subject to stakeholder consultation and have been amended in response to comments raised. Details of consultation are set out in the section below and findings are detailed in appendix 1.
- 3.12 Feedback was positive and input from stakeholders valuable in clarifying the form and content of both documents. Stakeholders unanimously agreed that the PANs should be clearly targeted towards householders in their language and content. This resulted in reducing the amount of technical detail, and simplifying the layout and presentation to make the documents more accessible for those without technical expertise. Appendix 1 summarises feedback and the way results have been incorporated into the drafting process for each PAN.

PAN: Householder guidance on energy efficiency for historic houses in Conservation Areas (Appendix 2)

- 3.13 This PAN explores energy efficiency and micro-generation technologies that can be installed in and on historic houses to reduce energy use and carbon emissions. The main focus is on measures where there are potential planning issues. The planning controls and policies that apply to the external appearance of historic houses in these areas differ from general planning controls and the PAN helps to explain this.
- 3.14 The PAN clarifies for householders what energy efficiency measures *can* be applied to historic homes in Conservation Areas, which measures need planning permission, and whether permission is likely to be gained.
- 3.15 Enquiries about replacement windows result in the largest number of enquiries in relation to Heritage policy. Consequently the PAN has a large section on windows. There have also been several changes to permitted development rights for micro-generation, such as solar panels, in Conservation Areas. The advice addresses this and other renewable energy measures that can be installed in historic houses.

PAN: Householder guidance on external wall insulation (Appendix 3)

- 3.16 External wall insulation (EWI) is the installation of an insulating layer to external walls. EWI has been installed widely in Europe but is less common in the UK. It is expensive but can significantly improve energy efficiency when well installed on a sound wall. Local housing and especially older housing may not be suitable for EWI on front elevations due to the need to maintain historic facades, architectural features and concerns in relation to damage that may result. This PAN clarifies relevant planning, legal and licensing issues, and signposts technical considerations in a way that is intended to be accessible for a householder.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 Funding was secured from government to develop draft text. The Planning Authority supported the development of guidance given the opportunity presented by the funding.

- 4.2 If the council did not develop the guidance the government funding would have had to be returned and the planning authority would not benefit from the advice notes which support the Modernisation and sustainability agenda.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 Internal consultation has been undertaken with Planning officers from Heritage, Design, and Development Management; and officers from Environmental Health; Highways; and Housing. A stakeholder consultation was held in June 2015 targeted at heritage experts, architects with sustainability expertise and a professional wall insulation expert. The event was attended by fifteen external and council stakeholders. Consultation outcomes are analysed in Appendix 1.
- 5.2 General feedback during the stakeholder consultation: 91% thought the guidance would clarify policy to users (9% were neutral prior to amendments being made). 100% thought the consultation was conducted clearly and with adequate opportunity to input.

6. CONCLUSION

- 6.1 Reduction in carbon emissions and fossil fuel energy use, addressing fuel poverty and improving city housing stock are targets across council and national policy.
- 6.2 The PANs support these aims and Modernisation agenda, streamlining the planning process and improving the customer experience. In addition, the PANs would help to ensure that the special character and appearance of conservation areas is preserved when energy efficiency is improved.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 7.1 The costs associated to the preparation of the Planning Advice Notes of officer time and external consultation have been funded from existing revenue budgets within the Planning and Housing Sustainability Team revenue budgets and grant funding from the Department of Communities and Local Government.

It is anticipated that approval of the Planning Advice Notes will generate efficiencies in the Planning advice service due to reduced householder queries.

Finance Officer Consulted: Steven Bedford

Date: 25/01/16

Legal Implications:

- 7.2 The PANS are not statutory documents. However, as noted in the report, in the context of their relevance to the determination of planning applications the PANS support adopted and emerging local plan policy by giving guidance on how compliance with policies can be achieved. Local plans are statutory documents and their policies will be material considerations in deciding relevant planning applications.

Lawyer Consulted:

Name Hilary Woodward

Date: 25/1/15

Equalities Implications:

- 7.3 The documents aim to encourage improvements to housing stock to mitigate against fuel poverty now and in future.

Sustainability Implications:

- 7.4 See references in Section 3 CONTEXT/ BACKGROUND INFORMATION.

Any Other Significant Implications:

- 7.5 None identified

SUPPORTING DOCUMENTATION

Appendices:

1. Analysis of Consultation
2. Draft Planning Advice Note: Householder guidance on energy efficiency for historic houses in Conservations Areas.
3. Draft Planning Advice Note: Householder guidance on external wall insulation

Background Documents

1. Brighton & Hove Renewable and Sustainable Energy Study (2012)

Crime & Disorder Implications:

- 1.1 None identified

Risk and Opportunity Management Implications:

- 1.2 The provision of guidance is intended to clarify planning policy and facilitate a smooth path through planning processes for planning applicants.

Public Health Implications:

- 1.3 There are 30,000 excess winter deaths in the UK (2013) and 10.4% of households in England are estimated to live in fuel poverty. Poor thermal performance in housing is a major cause of fuel poverty and excess winter mortality and ill health. The PANs encourage home improvements to future proof against current and future fuel poverty.

Corporate / Citywide Implications:

- 1.4 The PANs address Corporate Plan objectives *Health & wellbeing (6) Ensuring the city's housing stock is good quality, to support health and wellbeing;* and *Environmental sustainability (3) Protecting energy security for the city and improving housing energy efficiency to reduce environmental impact.*