

Andrew Boff AM London Assembly City Hall Kamal Chunchie Way London E16 1ZE

## Dear Mr Boff AM,

Islington Council is committed to becoming a net zero carbon borough by 2030 and since declaring a climate emergency in June 2019, this goal has been a focus for the entire council. In addition to the council making every effort to reduce the emissions from the borough, tackling the recent cost of living crisis is also a priority for us. These two goals align when focusing on protecting residents from fuel poverty in light of rapidly increasing energy prices.

Islington is home to over 5,000 listed buildings and 41 conservation areas, and it is widely agreed that this heritage significantly contributes to Islington's unique and special character. Islington council fully understands its duty to preserve this heritage as best as possible, and this is central to the work of the planning department. However, in the face of a climate emergency and a cost-of-living crisis, it is clear that more needs to be done to ensure that our planning and conservation teams need to strike the right balance when considering proposals for retrofit and renewable energy. Many of the street properties owned by the council are listed buildings or within conservation areas, housing associations also have assets with special heritage designations. Therefore, addressing the issue of retrofitting historic buildings will not only benefit private residents, but also council and social housing residents.

The motion put forward by the Chair of the Assembly focuses on one measure only – installation of solar panels on listed buildings. The installation of solar panels on residential properties would be an effective way for localised, clean energy production, and Islington of course supports its uptake. However, a Local Listed Building Consent Order (LLBCO) for solar panels is not the silver bullet the Chair suggests.

The planning department of Islington Council has looked carefully at the approach taken by RBKC. LLBCOs can take over a year to prepare and are, by their nature, very specific and limited in their scope.

Reducing the carbon emissions from a home can involve a wide range of interventions including: internal or external wall insulation, roof and floor insulation, heat pump installation, window repair and replacement, solar shading, and mechanical ventilation systems. Across the variety of housing stock in Islington different measures, or different combinations of measures might be more appropriate. Islington Council acknowledges the value of LLBCOs in benefitting the properties they apply to, however, as noted by a number of groups in response to the public consultation for RBKC's LLBCOs, we believe a Supplementary Planning Document (SPD) is the more expedient route for enabling retrofit works to heritage assets. The SPD will provide advice and guidance on the full range of possible retrofit measures for homes, and what will be required in a planning application to ensure approval. Residents would then be able to take forward a measure or measures suitable and feasible for their property type.

Islington's planning policy team are currently preparing Net Zero Carbon Supplementary Planning Document (SPD) which, amongst other things, will set out clear, evidence-based guidance on retrofit measures to households, and listed buildings and conservation areas will be explicitly addressed. Work on the preparation of the SPD has started including workshops with various stakeholders and it is clear there is a huge amount of public interest in this topic and enthusiasm for change. We would like to thank all the residents, businesses and local experts who have participated in the initial consultation workshops. As the draft SPD is being developed there will be more public engagement and workshops for stakeholders. A repeated point made by residents is that they want clarity from the council's planning department on what retrofit and renewable energy works will be allowed to conservation area and listed building homes.

While the Council is developing its policy on this, it has continued to grant permission for retrofitting of listed properties where possible. This year, planning permission and listed building consent was granted for retrofit measures at Bevin Court, a Grade II\* listed building which is also an internationally renowned example of British mid-20th Century social housing. Planning permission was granted for the installation of solar panels on the roof of the Grade II listed St. Luke's Church. Planning permission and listed building consent was granted for the installation of solar panels on the roof of a Grade II listed residential building. This clearly demonstrates that previously controversial retrofit and renewable energy works to listed buildings don't require a special mechanism such as an LLBCO to be enabled but can be permitted under the existing policy framework provided the approach of planning officers is adjusted.

We are confident that our SPD will achieve the same through providing detailed and clear guidance specific to householder proposals. Should applicants follow the guidance in their proposals, and planning officers assess the proposals against the SPD, there is no reason that approval is timely and straightforward.

Planning permission is not always needed for retrofit measures, even in conservation areas, and to support this we prepared and published a guide to permitted development rights for net zero works to houses and small businesses. This clarifies when planning permission is not needed and sets out how solar panels can be installed on the roof of a house in a conservation area under permitted development. However, we acknowledge that planning rules are sometimes complex, so we provide free planning advice to anyone who wants to retrofit carbon reduction measures to their homes or business premises. We are also planning to increase this free offer to residents in Autumn 2023 when we will offer a more comprehensive and free preapplication advice to help successfully guide residents through the planning process for retrofit measures.

To summarise, our council is determined to tackle the climate emergency and cut local people's bills by retorofitting homes in Islington wherever we can.

Yours Sincerely,

Cllr Kaya Comer-Schwartz

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Leader of Islington Council