



· INSTITUTE · OF · HISTORIC ·  
BUILDING · CONSERVATION

*Making Heritage Work*

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Dear Madam

#### **DEFINITION OF ZERO CARBON HOMES AND NON-DOMESTIC BUILDINGS**

The Institute of Historic Building Conservation (IHBC) is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

Thank you for inviting us to participate in this consultation.

The Institute's interest in carbon reduction lies mainly in the capacity of historic buildings, as a significant proportion of the stock of existing buildings, to contribute to national targets without harming heritage interests or the fabric of traditionally constructed buildings.

The Institute supports the hierarchical approach favoured by the Government. We would be keen to see the first two tiers to be as demanding as possible on the principle that all developments should make the largest possible direct contribution to carbon reduction targets. In this respect we favour the Government's proposal not to allow offsetting of renewable power generated off site.

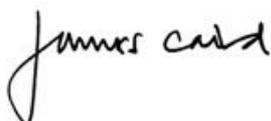
Our particular interest is in the allowable solutions tier, in particular those elements where benefits could be transferred to elements of the existing stock:

- retrofitting of higher standards to existing stock in the neighbourhood (although care is needed to ensure that this is part of a cumulative standard and does not allow less than optimum practice in the new-build element).
- Exporting of surplus energy produced on site, whether combined heat and power, electrical power or ground source heat to the rest of the neighbourhood.

The Institute is concerned that the Consultation concentrates on setting of standards rather than creating incentives and other conditions for the highest possible levels of outcome to be attained in every case. We think that there is substantial scope for carbon reduction beyond minimum standards to be achieved in many cases and that the Government should create conditions to bring this about as often as possible rather than merely promoting the achievement of minimum standards. By using a process standard we feel it might be possible to get away from the fixed point options – 44%, 70%, 100% - set out in the Consultation paper.

The Institute intends to comment at greater length on the parallel consultation on the heat and energy saving strategy but would urge that the results of the two consultations be integrated in to a single strategy to demonstrate the interdependency of the issues.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large initial 'J'.

James Caird  
Consultant Consultations Co-ordinator