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**Consultation on changes to Energy Performance Certificates (EPCs), Display Energy Certificates (DECs), and air conditioning inspection reports (ACIRs)**

The Institute of Historic Building Conservation 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.

In this consultation responses are sought to 48 questions posed. The introduction refers to “meaningful engagement” and in that regard IHBC wish to provide a broad initial response and to suggest in doing so that a contextual framework for historic building stock is needed to ensure that a one solution fits all type approach is not supported in the consideration of energy performance for buildings. We wish to highlight the importance of appropriately framing the advice with a passage which would highlight and contextualise the risks and disadvantages from adaptations in relation to the character of historic building stock.

It should of course also be flagged that in some cases Listed Building Consent will be required where works could have a negative impact on the significance of or the character of a building of special architectural or historic interest. This character can be impacted upon taking into account both internal and external change and it is also important to indicate the fact that changes in structures which are proximate to listed buildings of special importance have potential also to have a negative impact.

It is of utmost importance to emphasise that every effort to minimise harm is required even where those potential actions which could cause harm would not necessarily require Listed Building Consent. Emphasis needs also to be placed on the fact that the character of a traditional building could also be impacted upon negatively by adaptation even where it is not a listed building.

This is because the fabric of traditional buildings behave in different ways which need to be understood in the context of any adaptation measures proposed. Technical information needs to highlight specific potential risks for traditional buildings from carrying out adaptations. Understanding of their form of construction would ensure that even where features have been removed or adapted the remaining fabric should still be respected because if it is not the adaptive measures could create further problems for the structure in particular where ventilation is not adequate.

The Regulatory frameworks refer not only to listed heritage assets but also to buildings of traditional material and construction typology. Buildings of traditional construction are particularly prone to unintended consequences from measures designed to reduce heat loss and/or air leakage.

Statements of significance can be used to support decision-making concerning retrofit proposals as they should reveal potential impact if changes are to be made. The fabric from each different building campaign phase within a structure need be identified and understood in terms of its behaviour in the face of possible adaptation. Assessments of significance as part of a retrofitting process need to be done on a case by case basis in order to identify harm to that significance at the earliest possible stage.

There is a real danger in applying generalist approaches to decision-making which may require rather more subtle assessment of building fabric and significance from the outset. It is also important not to exclude buildings of more recent construction which have cultural heritage interest. They too have values in terms of quality of design technological or other innovation which can be negatively impacted by inappropriate adaptation.

IHBC has a concern that potentially interventions of a more major scale might be prioritised for reasons of policy, instead of proposing smaller changes which would better support the existing character of structures. Certain adaptation works to listed buildings could cause harm to significance. Even if only a relatively low level of harm (sometimes described as minor or negligible harm) would result, the courts have confirmed that such harm still constitutes harm in a manner that would not be in compliance with the NPPF.

What is needed here is a way of providing for appropriate specialist advice on appropriate adaptation and also a way of foreseeing potential impact of that adaptation in the context of all legislation and regulation. The approach which IHBC advocate would be to increase skills and competence of installers so as to reduce risk of unintended consequences for particular building typologies rather than a lowering of standards which will be the impact of proceeding without adequate knowledge of consequences of inappropriate adaptation for certain buildings.

IHBC generally supports a whole house approach and a holistic consideration of any planned interventions in terms of building fabric and design. In certain cases there is however good reason not to follow a whole house approach, where adaptation measures would be prioritised without considering what measures would be most appropriate considering the significance of the structure. We believe that in certain cases a very minimal level of intervention only may be most appropriate.

Perhaps these matters which we now raise could also be addressed at the stage where a building is being considered for eligibility for schemes. It could also be addressed by provision of support to owners of traditional buildings so that best approach can be considered and ascertained at an early stage. Suppliers of products also need to be targeted so that specifications proposed are appropriate for particular building typologies will not have a negative impact on their significance or on their fabric so that they may be best conserved.

By way of direct response to the specific questions raised by this consultation IHBC wish to add the following remarks:

**Question 1 - 6**. This response is being made on behalf of the Institute of Historic Building Conservation which 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.

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**Question 1**

To what extent do you agree or disagree that information using an energy cost metric should be displayed on EPCs? Please select one option for each building type.

**Domestic buildings**

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

**Non-domestic buildings**

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

If you wish, please explain your reasoning, and provide any evidence to support your view.

**Question 2**

To what extent do you agree or disagree that information derived from a fabric performance metric should be displayed on EPCs? Please select one option for each building type.

**Domestic buildings**

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

**Non-domestic buildings**

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.  
Results should be measured and cognisance taken of varied fabric performance. Guidance should be developed to demonstrate this.

**Question 3**

When evaluating the fabric performance of buildings, which methodology do you think should inform the basis of calculating a fabric metric? Please select one option for each building type.

**Domestic buildings**

* No preference
* Don’t know
* FEES
* HLP/HTC
* Other

**Non-domestic buildings**

* No preference
* Don’t know
* FEES
* HLP/HTC
* Other

If you wish, please explain your reasoning and provide any evidence to support your view.

IHBC wish to stress the importance of measuring responses for traditional buildings

**Question 4**

To what extent do you agree or disagree that information based on a heating system metric should be displayed on EPCs ? Please select one option for each building type.

**Domestic buildings**

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

**Non-domestic buildings**

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

Carbon metrics would allow for net embodied and embedded carbon changes be taken into account with proposed interventions.

**Question 5**

What are your views on the design principles and the scope for a Heating System metric? Please provide evidence where possible.

These should be based on energy and carbon rather than cost.

**Question 6**

To what extent do you agree or disagree that information based on a smart readiness metric should be displayed on EPCs? Please select one option for each building type.

**Domestic buildings**

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

**Non-domestic buildings**

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

**Question 7**

What are your views on the definition, design principles and the scope for a smart readiness metric? Please provide evidence where possible.

For appropriate buildings the metric could be useful, however buildings should not be penalised for lower marks in this metric.

**Question 8**

To what extent do you agree or disagree that information from an energy use metric should be displayed on EPCs? Please select one option for each building type.

**Domestic buildings**

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

**Non-domestic buildings**

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

**Question 9**

If an energy use metric is to be displayed on Energy Performance Certificates (EPCs), which type of energy use measurement should be used to calculate this metric? Please select one option for each building type.

**Domestic buildings**

* No preference
* Don’t know
* Delivered energy
* Primary energy
* Other (please specify)

**Non-domestic buildings**

* No preference
* Don’t know
* Delivered energy
* Primary energy
* Other (please specify)

If you wish, please explain your reasoning and provide any evidence to support your view.

This outcome is user-behaviour dependent.

**Question 10**

To what extent do you agree or disagree that information from a carbon based metric should be displayed on EPCs? Please select one option for each building type.

**Domestic buildings**

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

**Non-domestic buildings**

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

This information should including net embodied and embedded carbon changes particularly concerning any suggested interventions.

**Question 11**

To what extent do you agree or disagree with incorporating smart metering technologies, like SMETERS, into the energy performance assessment framework for buildings? Please select one option for each building type.

**Domestic buildings**

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

**Non-domestic buildings**

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.  
It is important to take account of issues which may arise due to lack of internet connectivity

**Question 12**

Do you have any views on key transition issues?

N/A

**Question 13**

What should be the validity period for Energy Performance Certificate (EPC) ratings?

* Don’t know
* Less than 2 years
* 2 years
* 5 years
* 7 years
* 10 years

**Question 14**

To what extent do you agree or disagree with the approach for any changes to validity periods to only apply to new EPCs?

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

EPC’s should be valid as long as there is no significant change to the building fabric or services, and should be renewed when significant changes have been carried out.

**Question 15**

To what extent do you agree or disagree that a new EPC should be required when an existing one expires for private rented buildings?

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

**Question 16**

To what extent do you agree or disagree that the regulations should be amended so that a property must have a valid EPC before it is marketed for sale or rent?

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

Transitional arrangements may be needed for sectoral capacity requirements.

**Question 17**

To what extent do you agree or disagree that houses in multiple occupation (HMOs) which don’t already fall under the (Minimum Energy Efficiency Standards) MEES should do so when a room is rented out?

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

Transitional arrangements may be needed for sectoral capacity requirements.

**Question 18**

To what extent do you agree or disagree that there should be a transitional period of 24 months to allow HMO landlords to obtain a valid EPC and comply with MEES regulations?

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

**Question 19**

To what extent do you agree or disagree with requiring short-term rental properties to have a valid EPC at the point of being let?

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

Again concerns about sectoral capacity to implement.

**Question 20**

To what extent do you agree or disagree with requiring short-term rental properties to have a valid EPC irrespective of who is responsible for meeting the energy costs?

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

Again concerns about sectoral capacity to implement.

**Question 21**

To what extent do you agree or disagree that we should remove the exemption for landlords from obtaining an EPC for buildings officially protected as part of a designated environment or because of their architectural or historical merit?

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

Adequate protections from inappropriate measures need to be put in place to remove the exemption. Risks include loss of heritage value, damage and deterioration to building fabric, negative impact on householders’ health and wellbeing. We appreciate that appropriate action is needed to protect households with poor quality insulation. There is a need for more to be done before a widespread rollout to traditional buildings will be successful.

The need for such an exemption could be removed if there could be assurance and confidence that a new EPC process was developed to allow a proper understanding of building pathology and how all buildings, but especially traditional buildings, function and is designed to work with the fabric of the building not against it.

Questions 22,23,24, 25, 26, 27, 28, 29, & 30 :N/A

**Question 31**

To what extent do you agree or disagree that data gathered in previous EPC assessments should be available for use in future EPC calculations for a dwelling?

* Strongly disagree
* Disagree
* Neither agree nor disagree
* Agree
* Strongly agree

**Question 32**

What are your views on the approach to using existing data, while balancing accuracy and practicality?

Only on the basis that data is used from new EPC’s from now on.

Question 33

To what extent do you agree or disagree that Accreditation Schemes should be given more responsibility for overseeing the training of energy assessors?

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

Question 34

Do you have suggestions for other actions which could be taken to improve the accuracy and quality of energy assessments, or to help identify fraud in EPC assessments?

Current sector capacity is too low and needs improvement.

Questions 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, &45.  
Not applicable

Question 46:

Please let us know if you have any evidence on the rate of voluntary implementation of recommendations made in EPCs.

Conflicting information available to householders at present and needs to be improved to instil confidence in providers

Questions 47,48

Not applicable

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