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Historic England  
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**Dear Sir**

**Consultation on Energy Efficiency and Traditional Homes  
draft Historic England Advice Note**

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 for all.

We are very pleased to have the chance to comment on the consultation document. The Institute's comments are as follows:

IHBC welcomes this consultation on the Historic England Advice Note concerning Energy Efficiency and Traditional Homes. IHBC supports the approach of co-ordinating energy improvements with design and heritage matters. It welcomes the contextualisation of this Advice Note within the NPPF and related guidance including HE's technical advice note Energy Efficiency and Historic Buildings: How to improve energy efficiency. The principle that alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation and national policy objectives is also welcomed.

The first paragraph says it is aimed at everyone from householder to professional. However this Advice Note seems much too technical for the householder. It doesn't help them to make decisions, it merely indicates how complex the issues all are! A first key question is what consideration, if any, has been given to the needs of the target audience/s? Second, has there been any dialogue or other customer research to support that consideration?

Something simpler, clearer and more concise would be more valuable for householders. An example of better directed householder advice would be the "Warmer Bath" booklet referred to in *section 5 Further reading, examples of local guidance*. Page 11 of this helpful booklet gives a clear hierarchy of actions for householders. This is available online: [https://www.cse.org.uk/downloads/reports-and-publications/energy-advice/insulation-and-heating/warmer\\_bath\\_june2011.pdf](https://www.cse.org.uk/downloads/reports-and-publications/energy-advice/insulation-and-heating/warmer_bath_june2011.pdf)

The Advice Note appropriately specifies that there is no 'one size fits all' energy improvement solutions and that the requisite approach needs to be contextually specific using a whole building approach. IHBC also welcomes the principle established in the advisory approach to non-designated heritage assets and the application of the principle of proportionality in the context of those assets.

IHBC welcomes the encouragement of reuse of existing resources and the steer to local planning authorities to ensure consistency between energy design and heritage matters. Also welcome is the emphasis on the complexity of assessing risks to heritage significance and understanding the performance of a house as an integrated environmental system.

IHBC considers that the emphasis on specialist assessment in assessing significance should be written in stronger terms and suggest that the need for an appropriately skilled assessor to make such evaluations is not emphasised strongly enough.

The draft Advice Note does not mention Government retrofit targets to 2030 as set out in the Clean Growth Strategy, or the formal commitment to Net Zero by 2050. These are the key topical context, for both private owners and public bodies, in which all consideration of energy efficiency and traditional homes now has to take place.

Another fundamental content query is the Advice Note's consideration of energy efficiency improvements only "*from the standpoint of the planning system*". This limitation is unhelpful, as it

ignores the existing Building Regulation Part L requirements for seeking conservation officers' advice (and the similar requirements which were in force for Green Deal providers). One of the most basic needs is to promote joined-up advice to householders and whether or not planning permission is needed - and in a way which engages Building Control, whether in-house, approved inspectors, licensed installers etc.

There is no mention in this Advice Note of Government requirements, as now set out in PAS 2035, for retrofits to meet these targets, or of BS 7913:2013 as equally key guidance providing an overall holistic approach to buildings and putting this issue in the context of others. Referencing PAS 2035 and BS 7913 where relevant would add vital 'independent standard' force to the advice, whether used within or outside situations subject to planning controls (important in this context to note that the conservation officer, if there is one, may be fielding queries from owners on proposed improvements which may or may not require permission depending on the approach taken: A low-impact approach, avoiding the need for an application, is desirable wherever possible).

IHBC welcomes the recommendation in the Advice Note of adopting the 'whole building approach', and the emphasis on prioritising regimes for maintenance. We also suggest that the recommendation to consult the Local Authority Conservation officer or a specialist historic building consultant should be made more strongly and that the consultation would be most helpful at an earlier stage in any proposals and should also be set out at an earlier stage in the Advice note.

The document will benefit from illustration with photographs.

The two new IHBC Toolbox Guidance Notes would be useful resources that could be referenced in the Advice note:

- IHBC Guidance Note 2019/3 Climate Change and Older Buildings is a Key Source  
[https://ihbconline.co.uk/toolbox/guidance\\_notes/climateChange.html](https://ihbconline.co.uk/toolbox/guidance_notes/climateChange.html)
- The IHBC Guidance Note 2019/4 on Retrofitting of Traditional Buildings is a useful resource as it attempts to join up all the issues in an understandable way. It links in with BS 7913 and takes full account of the STBA retrofit guidance wheel. It also explains some of the issues surrounding PAS 2035 in terms of

its potentially useful points but also its limitations  
[https://ihbconline.co.uk/toolbox/guidance\\_notes/retrofit.html](https://ihbconline.co.uk/toolbox/guidance_notes/retrofit.html)

**Some specific comments on the text:**

- Para 2 - cross-reference to BS 7913 would add force.
- Para 5 - wasting owners' funds and carbon. Supporting evidence of this should be included?
- Para 6 - surely "Tackling climate change" has to be mentioned as a key driver. Cross reference to the Clean Growth Strategy targets? The 2015 CSE report cited here while quite good on the overall context, is not up-to-date and is wholly inadequate on Part L special consideration, it does not mention Each Home Counts or BS 7913, it does not mention the need to put a building into good repair prior to retrofit measures, and it does not mention risks.
- Para 10. Stress the need for appropriate repairs and improvements by suitably skilled contractor. It would be a good idea to stress the need to both understand older buildings and learn lessons from the past (mention the damage caused by well-intentioned repairs in cement from the 1960s onward).
- Para 11 should specifically cross-reference the Part L special consideration for breathable construction
- Para 13 should also reference Part L and is a useful way of encouraging owners to get appropriately informed advice. This is also where PAS 2035 and its simplified guidance will be vital.
- Paras 20-21, 25 should have better links to STBA publications.
- Para 26 should cite BS 7913
- Para 38 is inadequate on buildings of breathable construction
- Para 40 should specifically reference the Technical Chapter in the landlord guidance

Yours sincerely

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