



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

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Dear Sirs

HEAT AND ENERGY SAVING STRATEGY

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. Our answers to the 29 questions posed are attached as an appendix to this letter, but we should like to make a few general comments here.

The document concentrates on delivery and techniques and refers little to consequential environmental impacts or other potential downsides of the options considered. Needless to say, therefore, great play is made of widespread use of techniques such as externally applied insulation (as less disruptive to householders than interior insulation) without reference to the possible disbenefits of this to traditionally constructed buildings or historic environments. Our members already report widespread misapplication of energy-saving techniques to traditionally constructed buildings which are costly to remedy both financially and in terms of energy consumption. In fact there is no reference in the document to historic environments, heritage or the sensitivity of traditionally constructed buildings at all. It seems to us that this is the main aspect on which Strategy needs to turn its attention.

Other aspects we wish to comment in general on are:

1. There is much talk of the cost-effectiveness of installing better energy efficiency but not much about the problem of improving this to the extent necessary to achieve the very demanding targets (e.g. near carbon neutrality for all dwellings by 2050 with 7 million homes receiving whole-house treatments by 2020). Very substantial reductions in the cost of energy saving and microgeneration techniques will be required to

convince property markets of their benefits to the widespread extent envisaged by the Strategy.

2. There is little or nothing in the Strategy about whole-life energy audit or the relative efficiency of competing generating and distribution methods. It seems to us likely that people will remain skeptical of the benefits of the proposed approaches to energy saving unless they can be convinced that there really will be an overall lessening of CO₂ emissions.

3. Considerable play is made of current good practice, but not much about how to replicate on a widespread basis the benefits shown in pilot projects which have had intensive support.

4. If a better supported whole house approach is in the offing, maintaining momentum with current levels of support may be difficult.

5. In order to ensure widespread best practice, emphasis is rightly placed on installer accreditation, but this needs to be capable of providing individualised assessment and improvement of property because much of the problem lies in traditionally constructed buildings which are potentially vulnerable to ill-considered intervention.

6. There is a lot of detail about how energy improvements might be financed. These mostly depend on funding from commercial sources and how to create incentives for investment and compensate for disadvantage. It seems to the Institute that resources need to relate to the property and not the occupier and be resourced through both carrot and stick methods attaching to the policy (e.g. soft mortgages and progressive withdrawal of tax benefits) but that these also need to allow for the physical appropriateness of the proposed works.

Yours faithfully

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

James Caird
Consultant Consultations Co-ordinator