



FuelPovertyandEnergyEfficiency@gov.wales
Domestic Energy and Fuel Poverty Team,
Third Floor North Wing,
Welsh Government.
Cathays Park
CF10 3NQ

The IHBC National Office
Jubilee House
High Street
Tisbury
Wiltshire
SP3 6HA
Consultations@ihbc.org.uk
29 March 2022

Dear Sir or Madam,

Re Consultation on Welsh Government: Proposals for the next iteration of the Warm Homes Programme

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:

Draft response

The Welsh Government consultation on Warm homes is about balancing the need to optimise the thermal and energy efficiency of Welsh homes with the need to address fuel poverty. The pledge is to maximise air tightness, eliminate thermal bridging, optimise insulation, solar gain and natural ventilation so reducing heat loss and making homes 'fabric ready'.

Whilst the principle of eradicating fuel poverty is laudable, IHBC suggest that when implementing this scheme allowances may be required for historic building stock. The consultation document does not differentiate between building typologies or take into account

architectural significance. Reasonable provision needs to be made for historic and traditional buildings.

Historic and traditional buildings should only have their energy efficiency improved to the extent that it does not risk the long-term deterioration of the building fabric, fittings or significance. In particular care should be taken with buildings that have a vapour permeable construction that both absorb and readily allow moisture to evaporate. These include wattle and daub, cob, stone and constructions using lime render or mortar.

It is important to take the following matters into account concerning historic building fabric:

Old buildings were traditionally constructed with technologies handed down through generations which allowed the building to breathe naturally. The building fabric was constructed in natural materials usually solid walls providing good permeability and flexibility. External surfaces were designed to absorb moisture and allow it to evaporate away naturally through porous surfaces, very much like an old great coat. This is in complete contrast to modern technologies where rain screens are designed to deflect the moisture away, very much like a plastic raincoat. The two technologies cannot be mixed and matched without causing fundamental problems.

Critically whilst exemptions and special considerations for historic and traditional buildings can be made there is no practical guidance as yet for the uplifting of requirements for traditional, historic and listed buildings. Technical information favours guidance for modern forms of construction, which from experience industry develop into off the shelf systems adopted by designers, builders, home owners, approved by building control and inappropriately applied to traditional historic and listed buildings. This shortcoming needs to be addressed.

As there is no practical guidance for traditional buildings to date this could have the effect of practitioners favouring inappropriate modern solutions for non-vapour permeable applications and it is difficult to control and regulate without proper up to date guidance in the Document. Even the Historic England guidance (from 2017) has been superseded by new research. Without proper guidance, the implementation of proposed inappropriate modern non breathable insulation systems will only make this situation worse. This critical aspect needs to be addressed in conjunction with the implementation of the scheme.

Summary of consultation questions

Question 1 – Do you agree the Welsh Government should balance the need to alleviate fuel poverty and create a socially just nation with the need to tackle the climate emergency, or should one of these objectives take precedence in the new Warm Homes Programme?

It is a laudable aspiration to ensure that there is a balance between those objectives. There is also a need for reasonable provision to be made for historic and traditional buildings in achieving this balance.

Question 2 - What is the gap in provision which you believe the next Warm Homes Programme should fill to achieve a greater benefit for Wales?

Question 3 – In 'Homes fit for the future, the retrofit challenge', the Future Generations Commissioner for Wales estimated investment of £14.75bn over the next decade to both eradicate fuel poverty and meet our net zero ambitions. What suggestions do you have on where the funding for this level of investment should come from?

Question 4 – Who do you think should be the primary focus of the next Warm Homes Programme?

Question 5 – At what level should the household income and savings threshold(s) be set, above which households would be excluded from home energy efficiency measures supplied at no cost to the householder?

Question 6 – Do you think the Welsh Government should extend the Warm Homes Programme to include other households in the owner occupier and private rented sector?

Question 7 – If yes, do you have a view on how this might be funded?

Question 8 – If other households are included in the eligibility for support through the Warm Homes Programme, should support be prioritised, for example limited to homes with a lower EPC rating such as EPC rating of D or worse?

Question 9 – What are the ways in which low income households can be helped to offset the cost of higher energy bills in the short term if low carbon heating measures, when installed, increase bills?

Question 10 – Should the following be included or excluded in the next iteration of the Warm Homes Programme, taking into account carbon savings, fuel poverty, local air quality issues and market readiness?

Question 11 - What is your view on continuing with a financial cap per household, noting that a lower cap will allow more households to gain support but of a lower value?

Question 12 - Do you have a view on allowing multiple applications per household over a period of five or ten years?

Question 13 –What are your views on the methodology and targets for the next iteration of the Warm Homes Programme?

Methodology and targets need to take into account technical issues concerning historic or traditional buildings and make provision for the special requirements of historic and traditional buildings.

Question 14 – Should the next iteration of advice services focus only on domestic energy efficiency?

Question 15 - If not, how might domestic energy efficiency advice services in Wales be integrated with other advice services designed to maximise income and tackle poverty?

Question 16 - Please share your views on the delivery of energy efficiency advice services and whether these should be independent of organisations appointed to deliver home energy efficiency improvements for householders? *The delivery of energy efficiency to historic or traditional buildings needs to be carried out by properly informed practitioners who understand that these buildings behave differently to buildings of more recent construction. Energy Performance Certificate (EPC) assessors need to be knowledgeable on the difference between traditional fabric and build to those of modern construction and to take this into account. EPCs must be carried out by an accredited domestic energy assessor which you can source in your area at the government's official EPC register for all the nations. <https://www.gov.uk/get-new-energy-certificate>*

Question 17 – What standards should be used for the installation of energy efficiency measures?

There should be specific guidance concerning installation of energy efficient measures to historic or traditional buildings. There is a need for good practical laymans advice on how to improve traditional buildings energy efficiency that is reversible and does not harm the significance.

Question 18 – How can the Warm Homes Programme better support the development of skills and jobs in the low carbon and housing retrofit sectors?

Appropriate guidance and training on suitability of different technologies for buildings of different chronologies so as to facilitate the understanding of different building behaviours.

Question 19 – Do you think the Warm Homes Programme needs to be set out in detailed Regulations, or can it be simply supported by scheme guidance published by the Welsh Government?

There should be specific guidance for Listed and traditionally constructed buildings either in formal regulations or scheme guidance produced.