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23 April 2018

**Dear Madam**

### **Each Home Counts Quality Mark consultation**

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.

### **Overall**

We feel that it is necessary for there to be an explicit acknowledgement that traditional buildings are different and need a different approach (up to 35% of the stock – see Solid wall heat losses and the potential for energy saving Literature Review, BRE for DECC 2014, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/396363/solid\\_wall\\_insulation\\_literature\\_review.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/396363/solid_wall_insulation_literature_review.pdf) ).

The document must embed throughout an explicit reference that historic and traditional buildings have a different construction and that the application of energy efficiency measures should carry a greater consideration of their significance and the potential to cause harm to its character and to its fabric integrity.

## **Standards** (section 5 etc)

Competent person schemes etc do not require competence in traditional buildings or understanding of regulations and guidance promoting special consideration for them (Building Regs Part L and BS7913:2013). How to ensure that customers are protected from ignorant contractors claiming competences they do not have?

## **Assessment and Design** (section 15)

We strongly welcome the holistic approach set out in 15.1.1, but this needs to be in accordance with BS 7913:2013, to include assessment of the condition of the property and specification of repairs required before the implementation of measures. Failure to deal with repair issues may nullify any potential benefits of the retrofit, and exacerbate deterioration leading to waste of money and carbon on both the retrofit and subsequent remedial works.

15.2.4 The building has to be understood, before developing or proposing alterations. New National Occupational Standards and qualifications have been developed specifically for Assessors and Installers to meet this need in relation to Older Traditional and Vulnerable Buildings – see <https://www.sqa.org.uk/sqa/68730.html>. These should be referenced and required.

18.1 The data warehouse should support information and advice not just on energy saving measures, but on behaviour change and other approaches achieving the aims without affecting building fabric.

### **Overall comment**

We have a serious concern that the Quality Mark Framework and its processes are not yet compatible with the wholly admirable “whole building” approach which is rightly being advocated. How will the consumer be protected from firms who have been awarded the Quality Mark, but who may not understand traditional buildings, or who hold the Quality Mark for a particular measure or installation that may be totally inappropriate (whether in isolation or in combination or conflict with other measures) for a traditional building?

We hope these remarks are of assistance,

Yours sincerely



IHBC Operations Director