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**Dear Sir**

**Public consultation on proposals to amend the Standard Assessment Procedure (SAP)**

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 as follows:

**General comments**

The document does not consider that old buildings may need to be treated differently to modern constructions. General tables indicating that the use of external or internal wall insulation will result in a warm house may mislead owners of old houses. A 'one size fits all' approach is unlikely to work in practice.

The document makes no mention of the research by the Society for the Protection of Ancient Buildings (see <https://www.spab.org.uk/advice/energy-efficiency/>),

Historic England and Historic Scotland where actual solid-walled buildings were tested and found to behave very differently than computer-modelled solid walls. There are a number of authoritative research reports in this area and that work should also be acknowledged.

**Question 7: Do you agree with the proposal to change the default U-values for walls for existing buildings in RdSAP?**

We especially welcome the reduction in the U-values for solid wall construction. We are glad to see this progress in accepting that historic buildings perform better than has previously been suggested and that retrospective insulation may not be so cost effective or necessary.

Clarification is required on the “apparent cost-effectiveness” comment (see page 20, para 44, second bullet) and how use of ‘in-use factors’ on Government schemes may be adjusted to affect cost figures. The implication is that despite evidence to the contrary, which has informed the new U-values, there may be ways around this where a Government scheme requires it.

Yours sincerely



Les Pickford  
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