

To Kester Providence, Beis re: Draft Domestic Private Rented Landlord guidance - 17 July 2017

The Sustainable Traditional Buildings Alliance welcomes the way in which the draft guidance highlights the technical risks inherent in the retrofit of traditional buildings. We have a number of recommendations as to how the guidance could be strengthened and made more useful:

1. At present (para 49 onwards) technical risks (damp, mould, air quality) are highlighted but risks to heritage have been ignored. This is an important omission as traditional buildings (not in conservation areas, i.e. the majority) do much to establish a sense of place for generations who have lived in and around them. Please see STBA's guidance wheel for useful information on heritage risks in addition to energy and technical risks.

2. Para 49 correctly refers to traditional buildings. It may be helpful to include some examples to help landlords understand whether theirs is a traditional building - eg solid brick or stone, mainly pre-WWI, terraced housing, etc.

3. The guidance begins by addressing issues to do with wall insulation. As acknowledged in para 55, the performance of most traditional buildings can be improved significantly without resorting to costly and risky measures, so we suggest that a whole building approach is required (please see attached Guide to Responsible Retrofit) and that wall insulation is only considered in the context of this wider approach. Para 50 does not distinguish between internal and external wall insulation - the risks are quite different.

4. Any retrofit survey of a traditional building should be carried out by a surveyor appropriately qualified in traditional buildings and in accordance with BS7913, which is based on first establishing an understanding of how they function - as you point out in paras 49 and 50. We suggest that BS7913 should be referenced, subject to arranging free access to all relevant standards. Access to standards is an issue being raised by the standards group of the Each Home Counts Review (on which I serve).

5. Any energy efficiency work to the fabric of traditional buildings should only be carried out by a contractor trained according to the CITB level 3 course in the retrofit of pre-1919 buildings.

6. It would be helpful to cross-reference Part LIB of the Building Regulations, and the specific text in 3.8-3-10 for traditional buildings. I understand that DCLG are currently reviewing their guidance on listed buildings so this would also seem to be relevant.

7. Colleagues from National Trust, Historic England and IHBC have all pointed out that the guidance for listed buildings and conservation areas remains unclear. In addition, the grey box after para 18 deals only with character and appearance, not the technical aspects included under the Part L special consideration; the box guidance only addresses external measures on listed buildings but IWI or other internal measures would often require consent.

As you are probably aware, the STBA represents an inclusive set of organisations from heritage, industry and sustainability so we are well placed to convey a balanced viewpoint from this sector to BEIS and to improve the guidance still further. We would of course be happy to discuss any of the specific observations above - or even to help draft a wider guidance document which could provide a point of reference for landlords of traditional buildings, guidance which could be more comprehensive than the current format allows. In the light of recent events, the health of building occupants must be considered paramount and there are serious risks in providing a partial solution to a complex issue.

We hope that this feedback is useful and look forward to engaging further as the guidance is finalised. Where the text is similar to the non-domestic guidance our comments may also be relevant.