**Sustainable Construction and Retrofitting Supplementary Planning Document (SPD) Consultation Response**

**Bath Preservation Trust**

**October 2021**

**Summary**

Overall the guidance is welcomed in this new format which is more supportive of making historic homes more energy efficient. We particularly welcome the inclusion of new detail and the quick wins section. The guidance for Listed Building Consent (LBC) is clearer and more user friendly that the previous version overall.

We still believe that there is scope for this SPD to be even more positive and encouraging through the use of appropriate language and leading statements. We do not consider that the SPD is positive and encouraging enough overall, and in parts is still too limiting when it comes to guidance for heritage buildings.

We believe that the cost of pre-application advice is a barrier to decarbonising homes. We refer to Greater Cambridge and recommend a similar approach locally which provides:

**Bookable free ‘surgery’ appointments** for residents of listed buildings and conservation areas to discuss proposals to improve energy efficiency with a Conservation Officer. And,

**Waiving householder pre-application and/or application fees** for decarbonising proposals where permitted development rights have been removed due to being within a Conservation Area/WHS, to complement our existing removal of fees for pre-applications related to article 4 directions or removal of permitted development rights through planning conditions.

Since 2011 BPT has taken the position which supports the replacement of windows with slim profile double glazing except for historic windows on significant facades. And is supportive of replacing Victorian or later windows in Georgian buildings with slim line double glazing in design that which is a better match with the Georgian glazing design or streetscape pattern. We feel the SPD should also take this position. On significant (listed building) facades the group value and cohesiveness of the group or street scene is still an important consideration and requires assessment on a case by case basis.

The SPD should **encourage and provide detailed guidance for the approach to secondary glazing in listed buildings without the need for listed building consent** or planning permission, where existing fabric won’t be irreversibly harmed or damaged. Or in the very least provide pro forma application templates to assist applicants. Currently installers ramp up costs to include LBC fees which increases the costs making it a barrier to effective change.

**General comments**

* B&NES Council should lead by example to support the aims of the LPPU and best practice in line with this SPD by retrofitting its own building stock using local skills and sharing this knowledge.
* The cost of a pre-applications for listed building advice/consent is a barrier to retrofitting.
* The previous B&NES SPD is not sufficiently accessible/publicised/utilised. It needs to appear in other areas of B&NES not just via planning. B&NES be more proactive in the SPD’s promotion, and outreach. We have reservations that too few residents will be interested/financially compromised/concerned enough to read and apply SPDs advice.
* The inclusion of ‘Quick Wins’ is strongly supported. It emphasises the power of small steps initially to make a start on reducing energy use. In the case of Heritage Assets, it encourages doing to least intrusive route to energy saving before other retrofitting options are considered. It also has the potential to reduce the perceived barriers to retrofit because it would provide options which are free/cheap, and do not require a professional.

* There is a perception that the ability to get planning permission for retrofits is rare and/or difficult, when this is not always the case. In this respect a more positive and encouraging upfront statement is required.
* The SPD should be EVEN more positive about what retrofit can take place in B&NES buildings. There should be a lessening of restrictions at the less visible or less significant backs of historic buildings and areas of lower visual impact.
* The SPD should make it clear how accessible some retrofitting measures really are and how they can be a good financial investment (especially for those on lower incomes).
* The SPD should make it clear what the benefit to landlords would be. There is new evidence to suggest that homes with top energy performance certificate ratings have higher values.
* It should be mentioned that there is a 5% VAT applicable to all retrofits, where there is an intention to improve energy efficiency, as opposed to the 20% which normally applies.
* There should be greater emphasis on seasonal secondary glazing (without LBC) and seasonal use to reduce condensation between the windowpanes and aid in summer ventilation to reduce overheating.
* We think solar PV planning permission is also required within conservation areas and the WHS? Solar PV advice is out of date with respect to PV and batteries. Batteries are not mentioned and now, we suspect the majority of installations outside large new building developments include battery storage systems, which has a cost saving if not a carbon saving benefit; future proofing of this advice might include making use of future solar to vehicle to grid technology to electricity storage?
* We encourage a solar PV design guide to support better installations in the World Heritage Site.
* We think the wording for ASHP’s “can be three or four times higher” would be more effective written as “300% to 400% more efficient and more importantly carbon efficient” – ASHPs are the single most effective and least disruptive of reducing a building’s carbon emissions by 50% to 75% today and by up to 90% as the grid decarbonises over the next 10 years – we think this should be given much greater prominence within the document.
* Replacing halogen lighting with LEDs seems to have limited prominence in the document but experience in Bath with some houses having up to 100 halogen downlighters (!) suggests their replacement is probably more critical than any of the other measures.
* To overcome the barriers, technical content should be included on the Council website showing energy cost saving figures which may be achieved through retrofitting, illustrating the long-term benefit of the upfront investment. Clear articulation of potential energy cost savings, in addition to carbon savings, that could be achieved e.g. We could create, or link to, an online tool on the Website to show what you could do for a particular building type with an indicative cost including any running cost (there are external tools already available/in development which could be used here e.g. Mitsubishi electric on heat pumps and Energy Catapult funded by BEIS).
* It should mention sources of funding for retrofits including Council-supported grants and loans e.g. Renewable heat incentive, as well as the eligibility rules.
* More ‘myth-buster’ case studies should be included showing was can be achieved and with ease.

Further broader comments

* Bath Preservation Trust have been monitoring approved Listed building applications for retrofit measures over last 2 years: out of around 20 homes, we cannot yet see much retrofitting being done. Feedback from applicants is being collected.
* The Council should consider adding a footer onto planning applications/Listed building consent forms wording that encourages applicants to consider the energy implications of their proposals.
* There is a skills shortage for implementing retrofitting measures within B&NES (Bath College at Norton Radstock Campus are looking into how to address this locally e.g. offering apprenticeships).
* Many heritage conservation professionals (LPA officers) need to be upskilled to know more about modern retrofitting possibilities for heritage assets which would allow more retrofits to take place e.g. in a way that isn’t intrusive or disruptive to heritage assets.

**Drafting comments:**

* The format, appearance, consolidation, and phrasing of the new combined pages compared to the original pages is welcomed.
* Lack of page and paragraph numbers.
* Small grey print is less legible and discouraged.
* (not normally) next to LBC in the table p15-16 requires explaining here.
* p44 sun pipe (giving inner light) not mentioned in drawing key.
* p56-58 examples – “double glazing” shown on front windows of LB examples – despite earlier guidance (p24-5) – should it specify ‘slim profile’ here or was work contrary to guidance?
* p81 – Warmer Bath given CSE link only not BPT.
* More proof reading needed throughout.
* The section on Boilers & Heating Controls (pdf p94-96) needs own words not preview of Rainwater Harvesting (pp97-99).
* Suggest less dour cover might improve expectations!

**Consultation response form**

1. What is the basis of your interest in sustainable construction and retrofitting in Bath and North East Somerset?
* I am a developer, an architect or built environment professional
* I am a landlord or letting agent
* I am a homeowner
* I am a tenant
* I'd rather not say
* Other…
1. Do you feel that the SPD provides practical guidance that will help people to retrofit buildings?
* Yes
* No
* Don't know

Please add any comments you have

1. Do you feel that the SPD provides practical guidance that will help people construct buildings more sustainably?
* Yes
* No
* Don't know

Please add any comments you have

1. Which version of the SPD document (online or PDF) have you used to respond to this consultation?
* Only the online version
* Mostly the online version
* The online and the PDF version equally
* Mostly the PDF version
* Only the PDF version
1. To what extent do you agree or disagree with the following statements?
* The PDF version of the SPD document is easy to use
* Strongly agree
* Agree – but very long winded – perhaps too comprehensive?
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. The online version of the SPD document is easy to use
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. The technical information in the SPD is easy to understand
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. It is helpful to have guidance for all building types (including heritage assets) available together on one page
* Strongly agree
* Agree
* Neither agree nor disagree - *might be even more helpful to have separate, shorter more pertinent documents with clear links between.*
* Disagree
* Strongly disagree
1. Please add any comments you have about the format, presentation and usability of the SPD document. Please make it clear which version you are commenting on (online or PDF)
* *Would have been helpful to have much clearer link from on-line to pdf*
* *The cover is discouraging*
1. Do you feel that the scope of the SPD covers a sufficient number of retrofitting options?
* Yes
* No
* Don't know

Please add any comments you have

Probably but not enough technical detail

1. Do you feel that the scope of the SPD covers a sufficient number of sustainable construction principles?
* Yes
* No
* Don't know

Please add any comments you have

**To what extent do you agree or disagree with the following statements?**

1. The references to various grant schemes will help people to overcome cost as barrier to retrofitting
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. The Affordable Warmth section of the SPD provides information that will help address the issue of Fuel Poverty in B&NES
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree

Please add any comments you have

1. The Energy Saving ‘Quick Wins’ Checklist page offers helpful tips to save energy
* Strongly agree
* Agree – *could more be done*?
* Neither agree nor disagree
* Disagree
* Strongly disagree
1. The Energy Saving ‘Quick Wins’ Checklist page offers helpful tips to save water
* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree

Please add any comments you have

* *Not enough examples – running water for teeth cleaning, hand washing (pre-Covid?), filling dishwasher full, full loads of clothes for washing, take shower instead of bath & collect insufficiently warm water for loo-flushing.*
* *Also need reminder re ventilation while air-drying clothes (balance between heat to dry & air to avoid condensation)*
1. Bath and North East Somerset Council has a Climate Emergency goal of achieving 65,000 retrofits by 2030. Do you think that the SPD will help B&NES to reach its target?
* Yes
* No
* Don't know

Please add any comments you have

**AS ABOVE**